



Animal Welfare.
Worldwide.

Senedd Cymru

Pwyllgor yr Economi, Masnach a Materion Gwledig
Bil Bwyd (Cymru)
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Ymateb gan: Four Paws UK

Welsh Parliament

Economy, Trade, and Rural Affairs Committee
Food (Wales) Bill

Evidence from: Four Paws UK

FOUR PAWS UK evidence submission to consultation on the Food (Wales) Bill 24/01/2023

FOUR PAWS UK welcomes the initiative of introducing a food bill that has the aim of bringing food policies under a holistic framework and moving beyond entrenched silos.

Food goals and targets

Sustainable Consumption targets

The needed reduction of meat and dairy consumption (and production) can be calculated in different ways, leading to slightly different figures. A well-accepted estimation by leading scientists collaborating in the EAT Lancet Commission suggests a 'Planetary Health Diet' based on modelling the 'planetary boundaries' in combination with health recommendations. EAT Lancet recommends a global reduction of 50% of meat, especially red meat, and a very moderate intake of dairy products.¹ Greenpeace's Science Unit draws similar conclusions, based on a similar approach.²

A fair and just distribution of the needed reduction of animal-based products would require the regions where consumption of these products is high – such as Europe and especially the US – to cut consumption levels more drastically than regions where consumption is lower – such as Southeast Asia and Sub Saharan Africa. A comparison of the 'Planetary Health Diet' to diets in Europe and the US indicates a needed reduction of meat intake by 70–90% or even more.³ FOUR PAWS therefore advocates for a target of 70% reduction by 2030.

Targets to consider:

- Set an overall target for the share of sustainable food in the market by 10 years from the adoption of the law and by 2055
- Elaborate by 2030 a plan for a transition towards phasing out industrialised animal farming and consistent support to farmers through trainings and access to fair prices, towards more sustainable, organic and agroecological practices
- Set clear targets across the food chain to reduce meat and dairy consumption in line with WHO dietary guidelines and EAT Lancet Diet in line with planetary boundaries (with indicators and monitoring)
- By 2050, enable a transition towards a good balance between land carrying capacity and animal farming, meaning that all the fodder should be locally produced and feed import phased out by 2040
- Set a non-voluntary target for the reduction of CO₂ emissions from food operations

¹ <https://eatforum.org/eat-lancet-commission/eat-lancet-commission-summary-report/>

² <https://www.greenpeace.org/eu-unit/issues/nature-food/2664/eu-climate-diet-71-less-meat-by-2030/>

³ <https://sustainableearthreviews.biomedcentral.com/articles/10.1186/s42055-019-0010-0>

Public procurement

Some EU countries, mainly in Western and Northern Europe, have mandatory meat reduction targets or meat-free menus in canteens in place, either at the national level (as in Denmark, France) or at the local level (Berlin, Vienna). In Vienna, this enables the city to save 57,000 euros and approximately 11,700 tonnes of CO₂ equivalents/year.⁴

Welsh procurement policies should be based on minimum standards that respect high animal welfare criteria and that specify the serving of a certain portion of plant-based protein per week.

This could include measurable targets such as:

- At least two plant-based days per week in public canteens.
- At least 60% of the volume of meat dishes should consist of beans, grains, vegetables or legumes.
- Each meal shall include at least one type of seasonal, fresh fruit, vegetable or legume (grown outdoors where possible).
- 100% of shell eggs and at least 50% of liquid eggs should be certified organic.
- Points will be awarded to a bidder based on the percentage (by mass/volume/value - to be defined by contracting authority) of food products with high animal welfare standards, including no cages, no mutilation, slow growing breeds, access to pasture, reduced use of antibiotics, and no transport to slaughter exceeding eight hours, or four hours for poultry and rabbits.

This should be applied across all public institutions including schools, care homes, government buildings, prisons, libraries and care homes.

We support the recommendations outlined in the *Food Policy Coalition Manifesto for Establishing minimum Standards for public Canteens across the EU* and seek to apply similar standards across the UK.⁵

FOUR PAWS UK Campaign

One of our major campaigns is Make Food Kinder – a campaign specifically looking at public procurement and lobbying local authorities to implement food policies that include commitments to reducing meat and dairy consumption, but also sourcing required animal products from higher welfare standards.

With £2.2 billion currently spent on food procurement in the public sector, FOUR PAWS

UK are calling on local authorities to reduce meat and animal products and exclude the worst animal cruelty in the food served at public institutions through our Make Food Kinder campaign.^{6,7}

As part of this campaign, we ranked each local authority we contacted and published the ranking at [MakeFoodKinder.co.uk](https://www.makefoodkinder.co.uk) and found that most local authorities are likely to be supporting the

⁴ https://noharm-europe.org/sites/default/files/documents-files/6171/2019-12-17_HCWEurope_Strategic_Procurement_Web.pdf Strategic procurement in European Health Care - Selection of best practice and case studies (HCWH, 2019)

⁵ MANIFESTO FOR ESTABLISHING MINIMUM STANDARDS FOR PUBLIC CANTEENS ACROSS THE EU https://foodpolicycoalition.eu/wp-content/uploads/2022/10/Manifesto-for-establishing-Minimum-Standards-for-Public-Canteens-across-the-EU_final.pdf

⁶ <https://committees.parliament.uk/publications/5509/documents/54917/default/>

⁷ <https://www.nfuonline.com/archive?treeid=101065>

lowest standards in animal welfare, such as eggs from caged laying hens, and procuring high volumes of animal products.

As 75% of District, County, Single-Tier Councils and Combined Authorities have declared a 'Climate Emergency' to date.⁸This means 308 councils have made a commitment to take positive actions that will help to protect the environment and to lessen their contribution to climate change. We believe that meat reduction targets and the incorporation of more plant-based meal options are sure way to honour this commitment, which have not yet been considered options by most local authorities. The current Government Buying Standards at best provides guidance to buyers on the legal requirements associated with the production and purchasing of food. The second paragraph, headed Production Standards, clearly states that if the adoption of the standards leads to a significant increase in costs there exists a mechanism to simply ignore them. As such, we struggle to see how this publication contains any mandatory standards at all.

Welsh Food Commission

Food system policy should be shaped by the idea that food is a common good, and must be developed through participatory and inclusive governance structures through representatives of all relevant stakeholders, at all levels. It is essential that animal welfare expertise is represented, and citizen participation essential.

A sustainable food system should function in ways that keep it well within planetary boundaries while providing accessible, affordable, healthy, nutritious and culturally acceptable diets to everyone at all times. It should equally integrate environmental and climate change protections as well as promoting and safeguarding human health, animal welfare, fair income and social values. These goals should be part of the commission's overall objectives, and not only focused on food security and socio-economic elements.

National food strategy

Food production, at least the current intensive industrial agricultural model with monocultures and chemical inputs, is putting a high pressure on the environment in terms of greenhouse gas emissions, biodiversity loss, water and energy use, and climate change.⁹ Industrial animal farming is also harming animal welfare considerably.¹⁰

Farming for animal-based products is an inefficient use of land and resources that could otherwise have been left untouched or farmed by small-scale farmers in diversified, higher welfare, agroecological systems, in line with the principles of social justice and food sovereignty. A fundamental transition of the food system to more diverse, ecosystem-based practices, that keep fewer animals in species-appropriate conditions, such as with continuous access to well-managed pasture, can also positively affect soil carbon sequestration through silvo-pastoral and agroforestry systems and appropriate feeding systems involving grazing.¹¹ This should fit nicely alongside the land use, land-use

⁸ <https://www.climateemergency.uk/blog/list-of-councils/>

⁹ <https://www.eea.europa.eu/signals/signals-2015/articles/agriculture-and-climate-change>

¹⁰ <https://link.springer.com/article/10.1007/s10806-014-9497-8#Sec14>

¹¹ Forabosco F. Canu F, & Mantovani R. Greenhouse gas emissions of livestock raised in a harsh environment. *Int. J. Glob. Warm.* 2018. 15, 431-446

change and forestry (LULUCF) and zero carbon plan, and supportive progressive initiatives like agroecology.

Health and wellbeing

There is scientific consensus as to the negative impact of overconsumption of animal sourced products on individuals' health – and specifically red and processed meat. In 2015, the World Health Organisation categorised red meat as carcinogenic to humans. Major health benefits are associated with reducing meat and dairy consumption, including tackling diet-related diseases such as obesity, different types of cancer, risk of coronary heart disease, type 2 diabetes, and reducing mortality from diet-related non-communicable diseases.¹²

With a strong national food policy that promotes animal welfare, human health and environmental wellbeing, the Government can be sure to meet at least five of the seven goals outlined in the Well-Being of Future Generations (Wales) Act 2015.¹³

1. *A prosperous Wales*. A comprehensive national food strategy that ensures low carbon emissions and efficiency, will help drive the economy and farming industry into a more sustainable and profitable future.
2. *A resilient Wales*. By protecting the environment and promoting biodiversity through sustainable farming practises and better animal welfare, we can be more resilient to zoonotic disease outbreaks and climate change impacts.
3. *A healthier Wales*. Increase plant-based diets can help to promote human health and wellbeing.¹⁴ And by protecting our natural environment we can provide essential access to nature for local citizens, improving mental wellbeing.¹⁵
4. *A more equal Wales*. A comprehensive national food strategy will enable all Welsh citizens to benefit from better health and wellbeing, no matter what their background or circumstances (including their socio-economic background and circumstances).
5. *A globally responsible Wales*. With a strong food policy for Wales, this will have a greater impact on the rest of the world, in terms of its contribution to climate and pandemic mitigation or its commitment to improving animal welfare standards, setting an example to other trading nations.

Environmental wellbeing

Increasing animal welfare has beneficial outcomes not just for animals, but also for the environment and for humans, as already set out in the One Health¹⁶ and One Welfare¹⁷ concepts. Improving animal welfare has also been recognised as contributing to achieving the Sustainable Development Goals.¹⁸ Specifically, SDG 1 “End Poverty”, SDG 2 “Zero Hunger”, SDG 3 “Good Health and Wellbeing”

¹² Willett W, Rockström J, Loken B, Springmann M, Lang T, Vermeulen S, Garnett T et al. Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems. The Lancet. 2019. 393, no. 10170 447-492.

¹³ <https://www.futuregenerations.wales/wp-content/uploads/2017/01/WFGAct-English.pdf>

¹⁴ <https://plantbasednews.org/lifestyle/health/men-vegan-diets-bowel-cancer-risk-study/>

¹⁵ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8125471/>

¹⁶ [One Health - OIE - World Organisation for Animal Health](#)

¹⁷ [One Welfare - Home \(onewelfareworld.org\)](#)

¹⁸ Keeling L, Tunón H, Olmos Antillón G, Berg C, Jones M, Stuardo L, Swanson J, Wallenbeck A, Winckler C, Blokhuis H. Front Vet Sci. 2019 Oct 10;6:336. doi: 10.3389/fvets.2019.00336

could be addressed by increasing animal welfare because production systems that ensure high animal welfare tend to also have a lower negative impact on the environment, climate and livelihoods. FOUR PAWS therefore believes that animal welfare is an integral part of any sustainable food system, as a stand-alone value, but also as a means of achieving the other aspects of sustainability such as human and environmental health. This and the reduced production of animal products and increased consumption of plant-based products are key to building sustainable food systems that operate within planetary boundaries and should be fully considered in achieving the secondary and primary food goals proposed by the bill.

We believe that the Government should:

- Conduct an analysis of the size of public procurement in the UK: where public money is spent for food procurement, and to buy what.
- Published an updated version of the Government Buying Standards for Food (GBSF), taking on board recommendations from the EFRA select committee¹⁹, with the aim to increase and make mandatory the present requirements for higher-welfare and higher-quality food, which presently have little more than a mere aspirational value. In whatever legislative context the country will move, the GBSF derive from the EU Directives on Public Procurement, therefore there are no obstacles to the adoption of more stringent measures when such Directives are implemented at the national level.
- Test the example set by universities where animal products such as beef and lamb have been banned and plant-based options increased in other public institution cafeterias. Record how much money this saves and how much the contribution to food-related carbon emissions is decreased (University of Cambridge estimates this has decreased by a third after banning beef and lamb from cafeterias).²⁰
- Link the launch of improved menus (more plant-based food, and higher-welfare animal products) to an extensive information campaign on the characteristics of the food purchased with public money, with a special focus on education to better food consumption in schools. This would help citizens make informed decisions about the food they eat through practical examples and raise awareness about what is behind the food they eat.
- Ensure consistency and repetition of the key decisions and messages in order to help consumers adopt better choices for their personal purchases too (similar to our three R's principle: Reduce, Refine, Replace)²¹
- Collaborate with retailers, food producers, restaurant chains and other businesses to favour the adoption of similar criteria in a more extensive way and in relation to ingredients too.

It is worth remembering that in relation to food choice, we are dealing with a necessary cultural change which will need consistency and long-term continuity in order to generate noticeable effects in society.

¹⁹ <https://committees.parliament.uk/committee/52/environment-food-and-rural-affairs-committee/news/153673/government-must-drag-public-food-procurement-standards-into-the-new-decade/>

²⁰ <https://www.cam.ac.uk/news/removing-beef-and-lamb-from-menu-dramatically-reduces-food-related-carbon-emissions-at-cambridge>

²¹ <https://www.four-paws.org/campaigns-topics/topics/nutrition/animal-welfare-and-nutrition>

Animal welfare

The UK's current high demand for animal products has led to the rise of 'megafarms' in the UK. The latest 2017 figures from The Bureau of Investigative Journalism show there are 789 'megafarms' in currently in the country, most of which house poultry – with the largest housing a staggering 1.7 million chickens.²² 'Megafarms' are classed as such if they meet one of the following US criteria for a Concentrated Animal Feeding Operation (CAFO), where a facility must have at least:

- 125,000 broiler chickens (chickens raised for meat),
- 82,000 laying hens (hens which produce eggs) or pullets (chickens used for breeding),
- 2,500 pigs,
- 700 dairy cattle, or
- 1,000 beef cattle

These intensive systems are inherently cruel. 'Enriched' cages for hens provide little more space than a piece of A4 paper, preventing chickens from even being able to flap their wings.²³ Dairy calves housed in solitary stalls,²⁴ are unable to practise their natural social behaviours and pigs can undergo painful mutilations like tail docking and teeth trimming,²⁵ all to ensure that they are more able to be housed in high stocking densities and generate higher profits. By limiting an animals' access to the outdoors, it is unable to express its natural behaviours, which is something key to its positive mental state – one of the Five Provisions, outlined in the Five Domains model.²⁶ This is seen significantly in dairy cows who are unable to access the outdoors and express stereotypic behaviours in response to their stress and confinement.²⁷

With all this in mind, FOUR PAWS UK are calling on the Government to:

- Support an end to the use of the cruellest systems including cages for hens, sows and calves.
- Prohibit applications for new 'megafarms' in the UK and Commit to phase out factory farming in the UK by 2030
- Declare a commitment to achieve at least a 50% reduction in meat and dairy consumption in the UK by 2030 in The National Food Strategy and any future food procurement policy (a target shared by the Eating Better Alliance for which FOUR PAWS UK is a member)²⁸

²² <https://www.thebureauinvestigates.com/stories/2017-07-17/intensive-numbers-of-intensive-farming>

²³ <https://poultrykeeper.com/rehoming-battery-hens/enriched-colony-cages/>

²⁴ <https://www.theguardian.com/commentisfree/2017/mar/30/dairy-scary-public-farming-calves-pens-alternatives>

²⁵ <https://www.gov.uk/government/publications/fawc-opinion-on-pig-mutilations-and-environmental-enrichment>

²⁶ <https://www.mdpi.com/2076-2615/10/10/1870>

²⁷ https://www.publish.csiro.au/ebook/chapter/9781486301614_Chapter4

²⁸ <https://www.eating-better.org/>

- Where animal-derived products are used, these should be sourced from higher welfare products so that the cruellest farming standards, such as eggs from caged laying hens are no longer supported

Local food plans

FOUR PAWS UK believe that in order to supply local food at scale to feed the Welsh population, the growing capacity of Wales must increase. Investment is needed into sustainable farming systems, urban agriculture and financial resilience training for existing growers and higher welfare farmers.

Foster short and circular supply chains

Supporting the connection of local producers with businesses and regional markets is imperative, alongside helping establish networks and adequate processing facilities for Welsh produce and improving current procurement models to provide secure and reliable contracts to local growers and farmers.

The development of regional distribution hubs would connect local producers with supply chains and help manage the uneven spread of food production across Wales, with gluts and gaps being more efficiently managed.

There must also be a role for smaller scale alternative supply chains, e.g., support for the establishment and running of farmers' markets that are accessible (physically and financially) to all, support to veg box schemes and models such as Community Supported Agriculture.

Encourage retailers to stock Welsh food

It is essential that if growing capacity increases, that Wales' businesses are encouraged to supply and sell local food. Regional hubs as previously mentioned, would allow better opportunities to access local food, and by marking as 'local' produce, businesses should expect to see increased sales, given the growing demand for better and local produce nationwide.

Encourage consumers to buy Welsh food

It is also essential that if growing capacity increases, that Wales' citizens are encouraged to buy Welsh food. In order to make informed choices, food labelling needs to be transparent and highlight where the food has come from, what welfare standards the animal was reared to, and its climate mitigation or environment impact. This will allow consumers to make fully informed decisions as to the produce they buy and eat. Red tractor or simple "made in Wales" will not address these issues and does not give the consumer adequate information to make an informed choice.

Any potential barriers to the implementation of the Bill's provisions and whether the Bill takes account of them

The Government must recognise that Local Authorities are critical to the success of any local food strategy as they are best placed to work at a local level and will be responsible for much of the implementation, however they need adequate support and resource, and this can be provided through present and future farming subsidy schemes.

It is essential that the Government and Local Authorities formally link both their food and climate agendas and strategies, for example through signing the Glasgow Declaration, and recognise the pivotal roles that localised food systems play in delivering on Wales' existing and future climate

change commitments. There are numerous global case studies looking at how food and climate policies can work together in tandem as part of the [Glasgow Declaration resources here](#). National bodies such as Cynnal Cymru and Sustainable Wales should also acknowledge the role of local government in the delivery of any food strategy and its place in their wider climate and biodiversity activities. In order to do this, they need to allocate dedicated resources.