

Ms Sue Hayman MP
Shadow Secretary of State for Environment, Food and Rural Affairs
House of Commons
London
SW1A 0AA

5 March 2018

Dear Ms Hayman,

Re: Response to Animal Welfare Plan

I am writing to respond to Labour's Animal Welfare Plan published last month.

There are a number of policies in the Plan that would have an impact on many of our 100,000 members and supporters, and we would therefore like the opportunity to provide some comments. The online consultation on the Plan is limited and precludes any serious consideration of the 50 policies outlined. I therefore thought I should contact you directly and I hope you will accept this letter as the Countryside Alliance's response to the consultation.

There are some sensible animal welfare policies in the Plan which the Countryside Alliance fully supports. However, we are concerned by your commitment in the foreword of the Plan "to make sure that the UK has equal and better animal rights across the world", which is made without explanation or qualification.

It is also disappointing that the Plan seems to have been produced with little, if any, consultation with the people who have the task of managing our countryside and wildlife. This is evident in the lack of policies that address welfare issues in rural areas and the inclusion of other policies that will cause concern to people in rural communities. The Plan is a missed opportunity to engage with people in rural areas and I hope that there will be proper engagement with the rural community before any of these policies are taken forward. I provide more detailed comments on the individual sections of the Plan below.

Strengthening animal welfare law in UK law

- The Countryside Alliance fully supports the transposition of existing protections for animals from EU to UK law.
- The Plan provides a commitment to "enshrine the principle of animal sentience in law" (1) but it is unclear how will this be achieved and what this will involve. There is widespread agreement that vertebrate animals are sentient and that laws should be designed to reflect this. The question is how the duty to have regard to the welfare needs of animals should be structured and balanced against other interests, and which animals this duty should extend to. It remains unclear from the Plan how Labour would address this issue.

Factory farming and slaughterhouses

- It is disappointing that this section of the Plan has been focused on larger, livestock farming which the document conflates with "intensive factory farming" (27). Large farms are not necessarily bad for welfare and there are many examples of large farms operating to very high standards.
- Many proposals in this section are vague; the commitment to "end the use of cages on British farms" (25), and the promise of a consultation on "megafarms" (26) have no definition or qualification. More information on these policies is needed.
- It is disappointing that other welfare concerns relating to farming such as sheep worrying, poaching, and fly grazing have not been included in the Plan.

Wild animals

- It is disappointing that 14 years after the Hunting Act was passed, Labour still tries to equate attacks against hunting with animal welfare policy, without any evidence to justify this. As you know, the Chairman of the independent inquiry into hunting set up under the last Labour government, Lord Burns, stated: "Naturally, people ask whether we were implying that hunting is cruel... The short answer to that question is no. There was not sufficient verifiable evidence or data safely to reach views about cruelty."
- The Plan refers to "loopholes" in the Hunting Act which allow the "illegal hunting of foxes and hares" (28) despite not producing any evidence to support this. Hunts have adjusted to operate within the law and any evidence of illegal hunting should be reported to the police. It is unclear what the 'loopholes' are and how Labour intends to "enhance and strengthen the Hunting Act" (28). More information on this policy is needed.
- The commitment to "end the badger cull" (29) is not balanced by any reference to how Labour would tackle Bovine TB and the cost to cattle, farmers, and the taxpayer of this horrific disease.
- The Countryside Alliance supports the commitment to "improve enforcement and prosecution rates for persecution of birds of prey" (34) and we hope that Labour will recognise and support the work already being done by the shooting community to address this.
- The commitment to "ban intensive rearing of game birds for shooting" (33) is extremely vague and we would welcome more information on the types of rearing that would be included in this policy. Gamebird rearing is subject to the Animal Welfare Act 2006 and there is also a statutory Code of Practice in place. The 2006 Act and Defra's Code are enforced by the Animal and Plant Health Agency and we see no evidence to justify further regulation.

Animals in sport

- The commitment to "issue best practice on responsible ownership, specifically for animals in sport" (39) ignores the fact that such guidance is already in place for many racing animals.
- The proposal to introduce a "centralised database" (41) for greyhounds risks increasing bureaucracy without improving welfare.

Appointment of an Animal Welfare Commissioner

- It is unclear how this role would work with government and whether this would be a political appointment, a civil servant, or an entirely independent position. It would be easy for this role to become divisive and political.
- According to the Plan, the Commissioner would be responsible for overseeing work to "place the enforcement of the Animal Welfare Act 2006 on a statutory footing" (49). This commitment is extremely vague and misleading since the police and CPS already have a statutory duty to enforce and prosecute offences under the 2006 Act. It is unclear whether this policy relates to granting local authorities, government agencies, or a private organisation, a statutory obligation to enforce the 2006 Act. Again, more information is needed.

We all support high standards of animal welfare and welcome public debate about how this is best achieved. However, it is vital that these debates are based on principle and evidence. I look forward to hearing more detail on the principles behind these policies.

I would be happy to provide further comments or information, and would be delighted to meet you to discuss our response if this would be helpful.

I look forward to hearing from you.

Yours sincerely,
T.P.C. R

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Chief Executive

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cc. The Baroness Mallalieu, President, Countryside Alliance – by email