

Email: Jim Moseley, CEO Red Tractor Assurance ([matt.darragh@redtractor.org.uk](mailto:matt.darragh@redtractor.org.uk))  
Subject: The Welfare of Pigs

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Dear Mr Moseley,

Red Tractor does not have a good record of ensuring that their accredited farms meet even the minimum legal welfare standards. For instance, although EU and UK law specifically bans routine tail docking and requires pigs to have access to manipulable material such as straw, many Red Tractor accredited farms ignore these laws and illegally keep pigs on bare concrete slats and routinely cut off their tails.

Red Tractor has undertaken to mirror DEFRA's Code of Practice for the Welfare of Pigs, which specifies higher welfare standards than the EU Directive that governed pig welfare while we were in the EU.

DEFRA's Code includes much more specific detail about the provision of manipulable materials than is included in the EU Directive for the Welfare of Pigs or in existing Red Tractor Standards.

*All pigs must have permanent access to enrichment materials which provide pigs with the opportunity to enable proper investigation, manipulation and foraging activities. Enrichment materials should enable pigs to fulfil their essential behavioural needs without compromising their health. They must be safe, hygienic and should ideally have the following characteristics: a) edible— so that pigs can eat or smell them, (possibly with some nutritional benefits); b) chewable— so that pigs can bite them; c) investigable— so that pigs can investigate them; and d) manipulable— so that pigs can change their location, appearance or structure.*

*Straw, and dried grasses, such as hay, are examples of optimal materials for environmental enrichment, as they can satisfy all of the characteristics described above when they are provided in sufficient quantities and regularly replenished. They are fibrous materials which the pig can eat; the pig is able to root in and play with; and, when used as bedding, these materials can provide the pig with physical and thermal comfort. There are a variety of straw types that can be suitable for enrichment, but some are less suited as bedding than cereal straws such as barley, wheat and oats. The key consideration is the quality of the material used, for example, not wet or mouldy.*

With regard to tail docking, there is also considerably more detail in DEFRA's Code than is included in the EU Directive, or in existing Red Tractor Standards.

*Routine tail docking is not permitted. Tail docking should only be used as a last resort, after improvements to the pigs' environment and management have proved ineffectual in preventing tail biting. Owners/keepers should document evidence of tail biting and keep records of the measures instigated and their effectiveness on improving the pigs' welfare. Where records are not available and pigs are found to be tail docked, this may be considered in any decisions regarding the legality of the tail docking procedure being carried out by owners/keepers. Where breeding units are tail docking in*

*response to requests from finishing units, it is the owner's responsibility to request this evidence from their supply units to justify any level of tail docking on the breeding unit.*

*If tail docking has been used on a farm to prevent tail biting for a sustained period of time, there should be a more regular review of current measures being taken to minimise tail biting in the herd and owners/keepers may need to consider changing management procedures or changes to the system in which the pigs are reared. Any new accommodation and slurry management systems should be designed to ensure that adequate enrichment material can be provided and other trigger factors for tail biting have been addressed to ensure tail docking is only seen as a last resort, non-routine measure. When designing and installing new accommodation the appropriateness of the flooring should be a material consideration.*

*Tail biting is a multi-factorial problem. Good stockmanship is important for identifying any risks before tail biting occurs, and addressing the underlying causes should improve health and welfare, promote positive well-being in the pigs and should ultimately reduce antibiotic use, mortality and carcass rejections which should lead to improved productivity of the herd. Routine management procedures and expected daily monitoring / recording requirements for tail biting risks should be recorded, for example, in a health and welfare plan.*

As a consumer I would like to be reassured that in the future, welfare standards followed by Red Tractor accredited farms meet or exceed those in DEFRA's Code of Practice.

To achieve this, Red Tractor should increase unannounced inspections of accredited farms, and take more stringent measures to enforce welfare standards.

If Red Tractor genuinely adopts the DEFRA Code, it would bring their standards within reach of RSPCA Assured welfare standards. If the two schemes were to align, with a credible inspection regime, consumers would benefit from having to understand fewer labels with differing standards.

If consumers were confident that Red Tractor was following the DEFRA Code, they would be willing to pay more for Red Tractor pork than for unaccredited products, as they already do for RSPCA Assured pork.

As a consumer I applaud your commitment to raising Red Tractor welfare standards but how will we know if you have succeeded if, as in the past, your accreditors fail to enforce minimum legal standards on Red Tractor accredited farms?