



National Sheep Association

Delivery of lifetime assured beef NSA response to RTA consultation 2015

The National Sheep Association (NSA) is the only UK-wide membership organisation dedicated to sheep farming. While many of our members will have both sheep and cattle interests, our organisational interests are sheep only and therefore our response is focussed mainly on how life time assurance for beef might impact on the sheep sector. In addition we have included a number of wider, more general points which we hope will be of help to Red Tractor Assurance.

NSA supports the concept of farm assurance as a foundation assurance to the many supply chains and markets that we work within. We are regularly told that RTA standards are predominantly legal requirements, a position we support and agree with. The value of the scheme is as an 'open door invite' to a third party to check compliance by all scheme participants, rather than rely on the chance of policing visits by the regulators themselves. On this basis we expect all British products to be produced to largely the same standards, but we can be confident that RTA scheme members are checked for compliance. This approach provides 'assurance' as opposed to being a brand or marketing scheme.

We are informed by RTA that the justification for lifetime assurance is due to consumer and retailer demand, and concern within the Red Tractor Board about the integrity of the brand given that other species (with the exception of beef and sheep) and products are already at life scale. We do not agree that the justification for lifetime assured beef is well enough evidenced and are concerned this may be more an internal aspiration rather than a move of necessity. We do not believe all the major retail chains that use the Red Tractor want to see lifetime assured beef and we would expect these retailers to understand their customers views and opinions. We are concerned about the reliance on consumer surveys that are said to demonstrate that many consumers already expect beef to be lifetime assured, or would want it to be that way, and we would want to see more detailed and open questions being asked of consumers.

Relating to sheep, we are regularly told that sheep lifetime assurance is not, and will not be, on the agenda and have been told by RTA spokespersons that sheep are different due to a more greatly known import product from NZ, as well as a more relaxed attitude to hill farms as major producers of store sheep. While we are relieved to receive these assurances we are critically concerned about the lack of any logical argument as to why the two species are so different given the arguments that have been used for beef lifetime assurance – If consumers would expect beef to be lifetime assured why would they not expect lamb to be the same, and why do the Red Tractor Board consider that the current residency period for beef risks the integrity of the brand when for sheep it does not?



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We appreciate that one of the founding aims of our farm assurance structure was to avoid supply chains and retailers from setting up a plethora of their own differing schemes and requirements, and we agree that in theory this would be desirable. However we suggest that this aim has already been lost in a marketplace that competes on points of difference with some of our key and large scale retailers using RTA for their foundation, but then building on this with a number of dedicated requirements. Where retailers require it, these additional requirements can easily be catered for through current inspection processes or as part of a normal supplier/retailer relationship. The NSA would prefer to see RTA **cater for** lifetime assurance where this is required and to **allow the market to pull it through**, paying a premium where it can be justified.

We understand that achieving lifetime assurance for beef will be difficult to achieve given the structure of the British beef farming sector. It would be even more so for sheep with its well established system of stratification and trade in store stock. In comparison with the other assured livestock sectors of poultry and pigs, beef and sheep are far less vertically integrated and this brings economic, environmental and social benefits. These core industry differences should be recognised with the aim of avoiding any move towards the vertical integration evident in the monogastric sectors. The assurance system should be there to support and aid the farming system, not the other way round.

In response to the questions in your consultation document:

Question 1. Do you consider that the proposal to implement a Cattle Rearing Register and a Cattle Rearing System is a reasonable and practical solution for the industry? If not, please identify why not and any thoughts you have for an alternative approach.

We do not believe that mandatory lifetime assurance is necessary, although we are supportive of RTA offering whole life assurance as an option within the scheme. We would like to see a proper consultation on this as a matter of principle. If the market was left to pull lifetime assurance through then farmers would respond if the market mechanisms were real and allowed to work. Schemes such as the cattle rearing register and cattle rearing scheme would not be required if RTA catered both for the supply chains that do want lifetime assured beef, and those that do not – although a RT scheme for rearing cattle is a reasonable approach. Forcing everyone to sign up to lifetime assurance when not all supply chains and retail outlets see it as necessary is loading unnecessary costs and requirements on those who will not benefit.

Question 2. In your opinion, should joining the Cattle Rearing Register be offered free of charge to farmers? If not, why not and how should we determine the charge?

Free of charge is not free of cost and if register joiners are being offered free involvement then someone is paying. The proposed administration service provision will carry a significant cost. It is unfair to expect full scheme members to subsidise this service and any use of scheme funds should only be approved for activities that have full industry backing – so no, the scheme should not be offered free of charge.



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Question 3a. In your opinion, which of the two implementation options (1- Batch or 2- Animal) would you like to see RTA adopt and why?

If the scheme was introduced then we see option two, offering individual animal identification as preferable. This is on the basis that we believe it essential to offer farmers the choice of finishing both assured and non-assured animals to supply differing outlets and not to limit farmers' ability to do what suits his system.

Question 3b. If RTA adopted implementation option 2 (individual animal checking), would you consider the Producer Declaration set out in Appendix 1 as an acceptable approach? If not, why not and can you suggest an alternative approach?

We see producer self-declaration as an acceptable approach. Even with self-declaration, checks are still possible and we see the levels of risk being low.

Question 4. What are your thoughts on the proposed delivery timetable - is it practical? If not, why not and can you suggest an alternative timetable?

Given our previous responses we are not sure this question is relevant.

Question 5. Have you any other observations on the assured beef/lifetime assurance proposal?

Other observations are included within the introductory text.

Question 6. Cross industry support and involvement will be fundamental to the successful delivery of lifetime assured beef. What role could you play in supporting RTA and the associated industry communication programme?

The NSA's role in communicating lifetime assurance for beef would be limited. RTA has given assurances that lifetime assurance for sheep is, and will not be, on the agenda. However if sheep were implicated in any way then NSA would see it as part of its responsibility to communicate between RTA and sheep farmers in both directions. This should not remove the clear need for improved direct communications from Red Tractor directly to scheme members. It should also be recognised that farmer representative organisations such as NSA will continue their activities as representative organisations and will speak out in defence of members views irrespective of roles played on RTA committees. More effort should be put towards developing communications strategies with stakeholder organisations to improve engagement and involvement in a more planned and co-ordinated way.

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23rd March 2015



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