



National Sheep Association

This is the NSA response to the Red Tractor Assurance (RTA) Standards Review 2017 consultation. It has been put together using comments from NSA regional committees in England, the NSA English Committee and individual members. NSA has published its response ahead of the RTA consultation deadline (31st December 2016) to encourage and assist people in formulating their own response to the consultation. NSA urges all farmers who are RTA members to respond to the consultation, as well as assurance schemes in other UK nations. Please use the information as a guide only and respond with your own personal views; DO NOT directly copy responses, as we understand RTA will not accept replica responses. The questions asked by RTA only make sense if read alongside the standards review – [click here to view](#) – which shows the suggested changes in red text alongside the existing standards. The codes referred to in the RTA questions refer to the different section of the standards.

Question from Red Tractor Assurance – see information provided by RTA for full explanation		NSA answer	NSA comment
2	TRACEABILITY AND ASSURANCE STATUS [TI]: [TI.c Key] We have strengthened the standard to ensure the RT assurance chain is maintained. Do you agree to the change?	Yes	NSA accepts the need for assured livestock to come through collection centres that are assured to Red Tractor standards or equivalent – but would like to see recognition and adjustment of APHA licensing processes so that collection centres (and markets) only need to be licensed and inspected by RTA contractors or APHA, not both.
3.1	VERMIN CONTROL [VC]: Do you agree to the change to VC.a (Key)?	No	NSA accepts the value of enhancing the vermin control standards on the basis that they will replace the need for training and licensing of farmers in order to use rodenticides. However, we can only accept the change if it is done in a way that ensures scheme members purchasing less than the threshold volume of rodenticides (proven by invoices) can ignore the standard. Assuming the change is done in this way, we believe bullet point 3 of VC.a could be incorporated with bullet point 1, as evidence of effective control is proof that entry points are minimised.
3.2	VERMIN CONTROL [VC]: Do you agree to the changes to VC.b?	No	As above, NSA can only accept the change if there is clarification that purchasing less than the threshold volume of rodenticides negates the need for such detailed record keeping.
3.3	VERMIN CONTROL [VC]: Do you agree to the changes to VC.b.1?	No	NSA can only accept the change if it is clearly stated that bait points in high risk situations (e.g. poison built into straw/hay stacks) is permissible.
4.1	HOUSING, SHELTER AND HANDLING FACILITIES [HF]: [HF.a] To ensure that livestock housing provides a safe environment, we have strengthened the standard to require that housing provided is secure. Do you agree to the change?	Yes	
4.2	HOUSING, SHELTER AND HANDLING FACILITIES [HF]: To ensure that the requirements are relevant to the beef and lamb sector the standard has been clarified. Do you agree to the change?	Yes	

5.1	FEED AND WATER [FW]: [FW.a Key] The standard has been strengthened to highlight the importance of forage/roughage for a healthy rumen. Do you agree to the change?	No	While NSA agrees livestock should be fed adequate forage to maintain rumen and body health, we believe inadequate forage being fed should show itself through the animal health plan and review. We are not sure how 'sufficient forage' will be inspected consistently unless health problems are identified through the animal health plan. We suggest the first bullet point is changed to include that the diet is adequate to ensure healthy rumen function.
5.2	FEED AND WATER [FW]: [FW.a.2] The proposed new standard focuses on body condition scoring as a welfare indicator and management tool. Do you agree to the change?	No	While a very valuable management tool, NSA does not feel body condition scoring is necessarily an indicator of welfare. Extreme thinness in sheep is an health issue that should be identified through the animal health plan, with welfare issues spotted by farm inspectors.
5.3	FEED AND WATER [FW]: FEED AND WATER [FW]: [FW.c Key] We have strengthened this standard by specifying that water troughs are kept clean and that water tanks do not run dry, therefore providing livestock with sufficient, clean water. Do you agree to the changes?	No	The first and second points repeat themselves. If the water supply is sufficient to cover times of peak demand then the refill rates will be adequate.
5.4-5.7	FEED AND WATER [FW]: FEED AND WATER [FW]: [FW.e] [FW.g] [FW.k] [FW.l] Do you agree to changes?	Yes to all four	
6	ANIMAL HEALTH AND WELFARE [AH]: [AH.h.1] The standard has been strengthened so that the vet is required to review the collation of antibiotics to ensure that antibiotics are being used responsibly. Do you agree to the change?	No	NSA believes vets will be suspicious about signing a collation that they cannot verify. There is no guarantee all medicines will be purchased from one vet and any one vet is unlikely to be prepared to sign such a collation. We also believe there are confused messages over whether the vet is signing that the collation is correct or whether they are just signing that a collation has been done. If it is the latter then the inspector can do this by checking the usage against the medicines record. We understand the objective of encouraging the farmer to review and investigate antibiotic use but we do not believe this standard will achieve this. A collation does not require alternatives to be considered or use to be reduced and we are aware that some farmers are actually being encouraged by animal health professionals to use antibiotics over available vaccines.
7	ARTIFICIALLY REARED YOUNGSTOCK (CALVES AND LAMBS) [CR]: [CR.b Key] The standard has been strengthened to highlight the importance of forage/roughage for development of a healthy rumen. Do you agree to the change?	Yes	
8.1	BIOSECURITY AND DISEASE CONTROL [BI]: [BI.a Key] We have strengthened the standard, introducing more robust requirements on when the biosecurity policy is updated, what it covers to prevent disease spread and that it forms part of the health plan. Do you agree to the changes?	Yes	

8.2	BIOSECURITY AND DISEASE CONTROL [BI]: [BI.b] We have strengthened the standard by specifying the disinfectants that can be used to prevent the spread of disease. Do you agree to the change?	Yes	NSA only agrees to this change if Defra approval is included on the containers. Farmers cannot be expected to check online or via other research when they are buying disinfectants so approval must become part of product labelling for this standard to be introduced.
8.3	BIOSECURITY AND DISEASE CONTROL [BI]: [BI.c] The proposed new standard identifies biosecurity risks from within the farm holding. Do you agree to the change?	Yes	
9.1	ANIMAL MEDICINES AND HUSBANDRY PROCEDURES [AM]: [AM.f Key] We have strengthened the standard with an additional requirement to ensure withdrawal periods are accurate and adhered to. Do you agree to the change?	Yes	
9.2	ANIMAL MEDICINES AND HUSBANDRY PROCEDURES [AM]: [AM.f.1] The proposed new standard strengthens the requirement to keep medicine records by requiring the total antibiotic used to be collated. This demonstrates responsible use of medicines. Do you agree to the changes?	No	NSA agrees with antibiotics being identified as such within medicine records but we are not convinced the proposals will result in more responsible antibiotic use. We would prefer this to be part of the health/disease/parasite annual review as part of health planning, for the review to look at health issues experienced over the year and to review the products and approaches used. In this way alternatives could be discussed with the vet and usage would relate to the health issues experienced. This type of approach would also deal with anthelmintics which, although with less human relevance, have even greater issues with development of resistance.
9.3	ANIMAL MEDICINES AND HUSBANDRY PROCEDURES [AM]: [AM.g.1] The proposed new standard ensures transparency of withdrawal periods for livestock leaving the holding, ensuring responsible use of medicines and food safety. Do you agree to the change?	Yes	
10.1	FALLEN STOCK [FS]: [FS.b] We have strengthened this standard to protect the Red Tractor brand by keeping fallen stock out of public view. Do you agree to the change?	No	NSA would prefer an amendment of bullet point 1 to require that fallen stock should be stored in containers/ bags/under cover. If they are protected from vermin then they will be out of sight.
10.2	FALLEN STOCK [FS]: [FS.c] This standard has been strengthened with additional, more robust requirements to prevent contamination and prevent disease spread. Do you agree to the change?	No	NSA believes biosecurity could simply be mentioned in bullet point 1 of FS.b.
11.1	ENVIRONMENTAL PROTECTION AND CONTAMINATION CONTROL [EC]: It is a legal requirement that injurious weeds are controlled. We have strengthened the standard to cover this legal	No	Injurious weeds are often outside of the control of the farmer, such on common land and/or open rough grazing under agri-environment schemes. If weed levels become injurious then this should be picked up through the animal health review.

	requirement and reduce the risk of livestock consuming injurious weeds. Do you agree to the change?		
11.2	ENVIRONMENTAL PROTECTION AND CONTAMINATION CONTROL [EC]: [EC.c Key] We have strengthened the standard to require more robust controls around all wastes, but in particular chemical wastes. All changes represent good practice for environmental protection. Do you agree?	Yes	NSA agrees to this change but asks that it be clarified as a requirement for plant protection product containers only (acronyms should be explained).
11.3	ENVIRONMENTAL PROTECTION AND CONTAMINATION CONTROL [EC]: [EC.d Key] This standard has been strengthened to ensure that any unapproved PPPs are stored in a manner that prevents contamination and pollution. Do you agree to the change?	Yes	
11.4	ENVIRONMENTAL PROTECTION AND CONTAMINATION CONTROL [EC]: [EC.d.1] The proposed new standard reflects legislative and Cross Compliance requirements for the use of PPPs. Do you agree to the change?	Yes	Again, NSA agrees to the change but asks for clarification over PPPs.
11.5 - 11.6	ENVIRONMENTAL PROTECTION AND CONTAMINATION CONTROL [EC]: [EC.f Key] [EC.f.1 Recommendation] Do you agree to the changes?	Yes to both	
11.7	ENVIRONMENTAL PROTECTION AND CONTAMINATION CONTROL [EC]: [EC.g.2] The proposed new standard requires any spraying contractors used to be suitably qualified and registered with a professional body for sprayers, the National Register of Sprayer Operators (NRoSO) to ensure continuous professional development. Do you agree to the changes?	Yes	NSA only agrees to this change if it is made clear that these standards are legal requirements.
11.8	ENVIRONMENTAL PROTECTION AND CONTAMINATION CONTROL [EC]: [EC.g.3] The proposed new standard requires professional advisers used for PPP usage are suitably qualified and registered with the professional body BASIS. Do you agree to the changes?	Yes	NSA only agrees to this change if it is a legal requirement.
11.9 - 11.11	ENVIRONMENTAL PROTECTION AND CONTAMINATION CONTROL [EC]: [EC.i.1] [EC.i.4] [EC.k Key] Do you agree to the changes?	Yes to all three	

11.13	ENVIRONMENTAL PROTECTION AND CONTAMINATION CONTROL [EC]: [EC.m.1] This standard has been strengthened to require that fertiliser applicators are checked annually for accurate application to prevent contamination and pollution. Do you agree to the change?	Yes	NSA agrees to this change but believes clarification is needed as to what constitutes checking and whether evidence/ recording is required – i.e. is a simple answer of ‘yes’ adequate?
11.13	ENVIRONMENTAL PROTECTION AND CONTAMINATION CONTROL [EC]: [EC.m.2] The proposed new standard requires professional advisers used for fertiliser usage are suitably qualified and registered with the professional body FACTS. Do you agree to the changes?	Yes	
12.1	COMPLETE FEEDBACK: Do the proposed standards meet your expectations?	No	NSA expectations are that we rationalise and simplify standards wherever possible. Our responses to previous questions outline where we do not think this is the case.
12.2	COMPLETE FEEDBACK: Red Tractor currently covers Animal Welfare (in the livestock sectors), Food Safety, Traceability and Environmental Protection. Are there any new areas (scopes) that you think we should include in our standards?	No	
12.3	COMPLETE FEEDBACK: Any further comments?	Yes	NSA agrees with the objective of maintaining the assurance chain, however we are seriously concerned about the impact of increasing standards and complexity on the willingness of sheep farmers to join RTA. We do not believe all the retail chain and consumer base require the high level of standards that are aspired to, but that they are being driven by specific elements of the retail chain who want to go higher than others anyway and will always want to maintain a point of difference. NSA would like to see more sheep farmers be part of farm assurance and we want to see Red Tractor Assurance as the large scale, industry-wide scheme that caters for the basics of the retail and consumer chain, allowing market operators to build their brands based on RTA assurance in the same way that the Kite mark provides that assurance of safety for electrical goods. While it is difficult to disagree with many of the standards changes in isolation, collectively they add a significant burden to farm businesses, result in criticism and discourage farmers from being scheme members. We believe that greater efforts should be made to rationalise and consolidate the standards so they do not become ever bigger and complex. A principle of one new standard in and one standard reduced should be applied wherever possible.