

Response ID ANON-N5R8-VSSY-2

Submitted to Lamb Welfare: Consultation on proposed changes to castration and tail docking methods (Lles Ŵyn: Ymgynghoriad ar newidiadau arfaethedig i ddulliau ysbaddu a thocio cynffonnau)
Submitted on 2026-03-05 11:32:08

Overview (Trosolwg)

Introduction (Cyflwyniad)

Legislation (Deddfwriaeth)

Proposals (Cynigion)

1. Using methods that do not cause significant pain (Defnyddio dulliau nad ydynt yn achosi poen sylweddol)
2. Administering pain relief for procedures (Rhoi meddyginiaeth lleddfu poen ar gyfer triniaethau)

Confidentiality and data protection (Cyfrinachedd a diogelu data)

About you or your organisation (Amdanoch chi neu eich sefydliad)

1a Would you like your response to be confidential? (Hoffech chi i'ch ymateb fod yn gyfrinachol?)

No

1b If you answered 'Yes' to this question, please give your reason(s): (Os mai 'Hoffwn' oedd eich ateb i'r cwestiwn hwn, nodwch eich rheswm/rhesymau:)

Reason for Confidentiality:

2 What is your name? (Beth yw eich enw?)

Name:
Phil Stocker

3 What is your email address? (Beth yw eich cyfeiriad e-bost?)

Email:
pstocker@nationalsheep.org.uk

4 Are you responding as an individual or an organisation? (Ydych chi'n ymateb fel unigolyn neu sefydliad?)

Organisation – You are responding in an official capacity as a representative of a business, business association or other organisation (Sefydliad - Rydych yn ymateb yn swyddogol fel cynrychiolydd busnes, cymdeithas fusnes neu sefydliad arall)

5 If you are responding as an individual in Question 4, where are you based/if you are responding as an organisation in Question 4, where is your organisation's headquarters? (Os ydych chi'n ymateb fel unigolyn yng Nghwestiwn 4, ble ydych chi wedi'ch lleoli/os ydych chi'n ymateb fel sefydliad yng Nghwestiwn 4, ble mae pencadlys eich sefydliad wedi'i leoli?)

England (Lloegr)

6 If you are responding as an organisation in Question 4, what is the name of your organisation? (Os ydych chi'n ymateb fel sefydliad yng Nghwestiwn 4, beth yw enw eich sefydliad?)

Organisation Name:
National Sheep Association

7 Which option best describes your reason for taking part in this consultation? Please select all that apply. (Pa opsiwn sy'n disgrifio orau eich rheswm dros gymryd rhan yn yr ymgynghoriad hwn? Dewiswch bob un sy'n berthnasol.)

Academic (Academydd), Animal welfare organisation (Sefydliadau lles anifeiliaid), Consumer (Defnyddiwr), Farming organisation (Sefydliad ffermio), Sheep farmer (Ffermwr defaid)

Other Role:

Surgical castration and tail docking (Ysbaddu a thocio cynffonnau llawfeddygol)

Fact banks (Banciau ffeithiau)

Please indicate your level of agreement with the following statements. (Nodwch i ba lefel rydych chi'n cytuno neu'n anghytuno â'r datganiadau canlynol.)

8a Surgical castration of lambs should only be permitted when carried out by a veterinary surgeon with an effective anaesthetic and analgesic. (Ni ddylid caniatáu ysbaddu ŵyn yn llawfeddygol oni bai fod hynny'n cael ei wneud gan filfeddyg gydag anesthetig a phoenliniarydd effeithiol.)

Agree (Cytuno)

8b Please explain your answer. (Esboniwch eich ateb.)

Surgical Castration Explanation:

We agree that surgical castration should only be carried out by a vet and using effective pain relief although the method of pain relief (anaesthetic or/and analgesic) should be left to the decision of the vet. If this is done by vets then the use of pain relief under the cascade system, and the required recording procedures, should be adequately fulfilled.

9a Surgical tail docking of lambs should only be permitted when carried out by a veterinary surgeon with an effective anaesthetic and analgesic. (Ni ddylid caniatáu tocio cynffonau ŵyn yn llawfeddygol oni bai fod hynny'n cael ei wneud gan filfeddyg gydag anesthetig a phoenliniarydd effeithiol.)

Agree (Cytuno)

9b Please explain your answer. (Esboniwch eich ateb.)

Surgical Tail Docking Explanation:

We agree that surgical tail docking (as described in this consultation) should only be carried out by a vet and using pain relief as decided by the vet surgeon. However we require clarity that hot iron tailing, which removes the tail through a knife and cauterisation, is NOT classified as surgical. We do NOT support a proposal that requires a vet to undertake hot iron tailing - farmers and stockpersons should be allowed to continue to use this method with appropriate equipment and training. For hot iron tailing we do not believe the industry is ready for routine use of anaesthetic or analgesia due to the fact that few products are licensed and there are risks with analgesia use in lambs. We do not agree that the use of the cascade prescribing system is suitable for routine use of vet medicines and stress that this approach is NOT what the cascade system allows for. Licensing of both anaesthetics and analgesics, and innovation around equipment to inject tails in a safe and low disease transmission manner is essential before routine use of pain relief is legislated for.

Rubber ring castration and tail docking up to 3 months

Fact banks (Banciau ffeithiau)

Please indicate your level of agreement with the following statements. (Nodwch i ba lefel rydych chi'n cytuno neu'n anghytuno â'r datganiadau canlynol.)

10a Rubber ring castration of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic. (Dim ond gydag anesthetig a phoenliniarydd effeithiol y dylid caniatáu i ŵyn hyd at 3 mis oed gael eu hysbaddu â chylchoedd rwber.)

Disagree - another reason or multiple reasons (please specify below) (Anghytuno - rheswm arall neu fwy nag un rheswm (nodwch isod))

10b Please explain your answer. (Esboniwch eich ateb.)

Rubber Ring Castration Explanation:

We accept that rubber ring castration causes pain at all ages and that there is little evidence to maintain the 7 day limit. We also support the alignment of England and Wales legislation to current Scotland legislation, allowing the use of rubber rings up to 3 months of age with the use of pain relief. We recognise that admission there is little difference in pain sensitivity irrespective of lamb age means there is a case for the use of pain relief products when using rubber rings at all ages. However, the sheep industry is NOT ready for a change that requires anaesthetic and analgesic to be used routinely when using rubber rings. This for the following reasons:

There is an absence of effective anaesthetic and analgesic products that are licensed for use in the UK, meaning that most products have to be prescribed using the veterinary cascade prescription route. Veterinary advice shows that there are serious health risks to using analgesics in young lambs particularly when prescribed dose rates are so small that overdosing is a strong possibility.

Many sheep vets do not agree that the cascade prescribing option is suitable for what would become routine prescription. The nature of prescribing via the cascade is that these are 'off licence' products that pose risks and require a high level of supervision.

The use of injectable anaesthetic and analgesics in a working lambing environment creates additional health and disease risks through multiple injections being administered in busy and non sterile conditions. Before the routine use of injectable pain relief is considered we strongly believe there needs to be more innovation and technology into sterile application techniques particularly for small dose rates - or that product development allows for larger dose rates that reduce adverse health risks (we would remind that although it wouldn't have been suitable for this purpose we have lost the only sterile injecting method that was available (Stericaps).

Overall NSA would like to see the development of a medium scale (5 - 10 year) 'Roadmap' that deals with the issue of castration and tailing in lambs - with a number of points (such as licensing of products) that have to be reached before further progress can be made. In the meantime we would propose that we maintain the ability to use rubber rings without the use of pain relief up to 7 days of age, and for Govt and industry to step up efforts to encourage voluntary use where it is felt to be practical. We would like to see the use of rubber rings for castration be allowed in England and Wales, with the use of pain relief, between 7 days and 3 months of age.

11a Rubber ring tail docking of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic. (Dim ond gydag anesthetig a phoenliniarydd effeithiol y dylid caniatáu tocio cynffonau ŵyn hyd at 3 mis oed â chylchoedd rwber.)

Disagree - another reason or multiple reasons (please specify below) (Anghytuno - rheswm arall neu fwy nag un rheswm (nodwch isod))

11b Please explain your answer. (Esboniwch eich ateb.)

Rubber Ring Tail Docking Explanation:

We accept that rubber ring tailing causes pain at all ages and that there is little evidence to maintain the 7 day limit. We also support the alignment of England and Wales legislation to current Scotland legislation, allowing the use of rubber rings up to 3 months of age with the use of pain relief. We recognise that admission there is little difference in pain sensitivity irrespective of lamb age means there is a case for the use of pain relief products when using rubber rings at all ages. However, the sheep industry is NOT ready for a change that requires anaesthetic and analgesic to be used routinely for tailing when using rubber rings. This for the following reasons:

There is an absence of effective anaesthetic and analgesic products that are licensed for use in the UK, meaning that most products have to be prescribed using the veterinary cascade prescription route. Veterinary advice shows that there are serious health risks to using analgesics in young lambs particularly when prescribed dose rates are so small that overdosing is a strong possibility.

Many sheep vets do not agree that the cascade prescribing option is suitable for what would become routine prescription. The nature of prescribing via the cascade is that these are 'off licence' products that pose risks and require a high level of supervision.

The use of injectable anaesthetic and analgesics in a working lambing environment creates additional health and disease risks through multiple injections being administered in busy and non sterile conditions. In particular for tailing, injecting tails in an area that is often contaminated with meconium would be unadvisable. Before the routine use of injectable pain relief is considered we strongly believe there needs to be more innovation and technology into sterile application techniques particularly for small dose rates - or that product development allows for larger dose rates that reduce adverse health risks (we would remind that although it wouldnt have been suitable for this purpose we have lost the only sterile injecting method that was available (Stericaps). Other options may become available such as Lidobands (rubber rings impregnated with slow release anaesthetic) but these need to be affordable with additional costs needing to be recouped.

Overall NSA would like to see the development of a medium scale (5 - 10 year) 'Roadmap' that deals with the issue of castration and tailing in lambs - with a number of points (such as licensing of products) that have to be reached before further progress can be made. In the meantime we would propose that we maintain the ability to use rubber rings without the use of pain relief up to 7 days of age, and for Govt and industry to step up efforts to encourage voluntary use where it is felt to be practical. We would like to see the use of rubber rings for castration be allowed in England and Wales, with the use of pain relief, between 7 days and 3 months of age.

12 What actions are needed from government and relevant stakeholders to support industry in moving away from this method? (Pa gamau sydd eu hangen gan y llywodraeth a rhanddeiliaid perthnasol i gefnogi'r diwydiant i symud oddi wrth y dull hwn?)

Rubber Ring Actions:

Some of these are outlined in the above sections and they need Govt and industry to be working in partnership. In summary:

We would like to see the development and agreement on a medium term UK wide roadmap that deals with this issue, say 5 - 10 years, with clear objectives and outcomes, and points in the roadmap that need to be reached before moving further.

We need to see anaesthetics and analgesics fully licenced before their use can become mandatory.

We need investment and innovation in application techniques - sterile injecting methods and potentially topical applications.

Linking castration and tailing to other health initiatives such as the AHW Pathway is critical - during a review visit for vets and farmers to have discussions around alternatives to castration and tailing, and discussions around pain relief, would make a significant contribution to changing hearts and minds.

Investment in research trials to provide more information on emerging new products such as Numnuts and Clipfitter is critical in building learning and confidence in these types of products - it is clear they can make a substantial contribution to improving welfare - but it could also be that some of our regular approaches to what we do also need to change. Simply applying 1 action in what could be a 4 or 5 point plan for change may not be enough.

Retailers and processors need to be part of any agreed roadmap - there are still supply chains that wont take entire ram lambs (so require castration), and increased abattoir waste needs recognition

We need sheep breeding strategies that support any move away from castration and tailing - breeding for shorter and less wool dense tails is possible, and general breeding for sheep health and robustness and parasite resistance will help reduce risks of fly strike.

Supply chains that support appropriate breeds being kept in appropriate places would assist with nutrition and pasture type being suitable for the breed and reducing dirty tails.

Sheep breed societies need to be included in any UK roadmap in relation to evolving what might be 'acceptable' in the show and sale ring.

Importantly Government needs to recognise and value the diversity of the UK sheep industry and accept that any one size fits all approach doesn't suit an industry that provides so much diversity, continuity in the supply chain through a wide range of ages of sheep coming forward to slaughter. What suits one farm or farming system doesn't suit another and what is important is that livestock husbandry practices are considered and considerate, that they can be justified, and that steps are always taken to move towards best practice in pain relief.

Clamp castration up to 3 months (Ysbaddu a chlampiau hyd at 3 mis oed)

Fact banks (Banciau ffeithia)

Please indicate your level of agreement with the following statement. (Nodwch i ba lefel rydych chi'n cytuno neu'n anghytuno â'r datganiad canlynol.)

13a Clamp castration of lambs up to 3 months should only be permitted with an effective analgesic. (Dim ond gyda phoenliniarydd effeithiol y dylid caniatáu i ŵyn hyd at 3 mis oed gael eu hysbaddu â chlampiau.)

Disagree - another reason or multiple reasons (please specify below) (Anghytuno - rheswm arall neu fwy nag un rheswm (nodwch isod))

13b Please explain your answer. (Esboniwch eich ateb.)

Clamp Castration Explanation:

We agree that this proposal (to use an analgesic only when using clamp castration) should be the ambition, however as previously stated the industry is NOT ready for this change until there are licenced analgesic products that are fully available and safe for use, and until there is suitable technology and product development to enable safe, fast, reliable, and cost effective administration. The use of cascade prescribing for this use is not acceptable.

Combined method castration and tail docking up to 3 months (Ysbaddu a thocio cynffonnau dull cyfun hyd at 3 mis)

Fact banks (Banciau ffeithiau)

Please indicate your level of agreement with the following statements. (Nodwch i ba lefel rydych chi'n cytuno neu'n anghytuno â'r datganiadau canlynol.)

14a Combined method castration of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic. (Dim ond gydag anesthetig a phoenliniarydd effeithiol y dylid caniatáu i ŵyn hyd at 3 mis oed gael eu hysbaddu drwy ddull cyfun.)

Disagree - another reason or multiple reasons (please specify below) (Anghytuno - rheswm arall neu fwy nag un rheswm (nodwch isod))

14b Please explain your answer. (Esboniwch eich ateb.)

Combined Castration Explanation:

We see this combined method to be similar to the use of clamping described in section 13 and therefore our answers in section 13b apply here. We do not agree with the additional use of anaesthetic (over and above that proposed for clamping) if this method is chosen and would see that the requirements for the combined method, if chosen, should align with those for clamping. Previous comments about our opposition to routine use of the cascade prescribing system stand here - until products are licensed and application methods are available its use cannot become mandatory.

15a Combined method tail docking of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic. (Dim ond gydag anesthetig a phoenliniarydd effeithiol y dylid caniatáu thocio cynffonnau ŵyn hyd at 3 mis oed drwy ddull cyfun.)

Disagree - another reason or multiple reasons (please specify below) (Anghytuno - rheswm arall neu fwy nag un rheswm (nodwch isod))

15b Please explain your answer. (Esboniwch eich ateb.)

Combined Tail Docking Explanation:

Our answers in 13b and 14b apply here.

We do not agree with the additional use of anaesthetic (over and above that proposed for clamping) if this method is chosen and would see that the requirements for the combined method, if chosen, should align with those for clamping. Previous comments about our opposition to routine use of the cascade prescribing system stand here - until products are licensed and application methods are available its use cannot become mandatory.

Clip castration and tail docking up to 3 months (Ysbaddu a thocio cynffonnau hyd at 3 mis oed)

Fact banks (Banciau ffeithiau)

Please indicate your level of agreement with the following statements. (Nodwch i ba lefel rydych chi'n cytuno neu'n anghytuno â'r datganiadau canlynol.)

16a Clip castration of lambs up to 3 months should be permitted without an effective anaesthetic or analgesic. (Dylid caniatáu i ŵyn hyd at 3 mis oed gael eu hysbaddu â chlip heb anesthetig a phoenliniarydd effeithiol.)

Agree (Cytuno)

16b Please explain your answer. (Esboniwch eich ateb.)

Clip Castration Explanation:

We agree that the evidence to date supports that the clip method should be an option up to 3 months of age without the use of anaesthetics and / or analgesics. This is not to say that the legislation should require the use of clips (or clipfitter as this is the only option on the market), but that its use should be an option within any change of legislation. We are aware that there is not industry wide confidence in this method, and its suitability across all our sheep breeds and sheep systems and consequently we would like to see further trials and research undertaken. There is nervousness around its use for tailing, and concern over the speed of application as well as some experience of health problems caused. There is wider concern over plastic waste and the potential for soil or forage contamination. We support the option of this method and would like to see further trial and field work conducted to better inform industry.

17a Clip tail docking of lambs up to 3 months should be permitted without an effective anaesthetic or analgesic. (Dylid caniatáu tocio cynffonau ŵyn hyd at 3 mis oed â chlip heb anesthetig a phoenliniarydd effeithiol.)

Agree (Cytuno)

17b Please explain your answer. (Esboniwch eich ateb.)

Clip Tail Docking Explanation:

We agree that the evidence to date supports that the clip method should be an option for tailing up to 3 months of age without the use of anaesthetics and / or analgesics. This is not to say that the legislation should require the use of clips (or Clipfitter as this is the only option on the market), but that its use should be an option within any change of legislation. There is nervousness around its use for tailing and the potential to crush vertebrae and complicate welfare outcomes. There is wider concern over plastic waste and the potential for soil or forage contamination. We support the option of this method and would like to see further trial and field work conducted to better inform industry along with education and training on its most effective use.

Hot iron tail docking up to 3 months (Tocio cynffonnau â haearn poeth hyd at 3 mis oed)

Fact banks (Banciau ffeithiau)

Please indicate your level of agreement with the following statement. (Nodwch i ba lefel rydych chi'n cytuno neu'n anghytuno â'r datganiad canlynol.)

18a Hot iron docking of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic. (Dim ond gydag anesthetig a phoenliniarydd effeithiol y dylid caniatáu tocio cynffonau ŵyn hyd at 3 mis oed â haearn poeth.)

Disagree – another reason or multiple reasons (please specify below) (Anghytuno - rheswm arall neu fwy nag un rheswm (nodwch isod))

18b Please explain your answer. (Esboniwch eich ateb.)

Hot Iron Docking Explanation:

We accept the ambition to reduce pain caused by hot iron tail docking through the use of anaesthetics and analgesics, however previous comments over our opposition to mandating the use of products that are not licenced for use. As previously stated we do not accept the mandating of product use that is only available via the cascade prescribing system. We strongly advise that this be an essential element of the roadmap that we have proposed.

Stockkeeper training (Hyfforddiant stocmoniaeth)

19a Please indicate your level of agreement with the following statement. Castration and tail docking of lambs should only be performed by a trained and competent stockkeeper. (Nodwch i ba lefel rydych chi'n cytuno neu'n anghytuno â'r datganiadau canlynol: Dim ond stocmon cymwys a hyfforddedig ddylai ysbaddu a thocio cynffonnau ŵyn.)

Disagree (Anghytuno)

19b Please explain your answer. (Esboniwch eich ateb.)

Trained and Competent Stockkeeper Explanation:

We agree that these operations should be carried out by trained and competent stock keepers. However to 'agree' gives no ability for young people and new entrants to gain experience in a practical setting. Consequently we would advise that castration and tail docking should be performed by, or under the close observation of, a trained and competent person.

20 What makes a stockkeeper trained and competent? Please select all that apply. (Beth sy'n gwneud stocmon yn gymwys a hyfforddedig? Dewiswch bob un sy'n berthnasol.)

Other – please specify below (Arall - rhwch fanylion isod)

Other Training Type:

In answering this question we are referring to a stockkeeper being trained and competent in castration and tailing and NOT the wider aspect of competency. We would support the option for training on farm provided this is done by someone who has been trained and is competent and experienced.

We consider this competency skill to be relatively easy to gain and could be done during routine vet visits, via lambing clubs, or arranged by agricultural

suppliers and farming groups etc

Any record of training should be considered adequate proof and this could be photographed, e mailed confirmation, written certificate etc. It should not be necessary for this to be part of any official national skill recognition.

Castration and tail docking in young lambs (Ysbaddu a thocio cynffonnau mewn ŵyn ifanc)

Fact banks (Banciau ffeithiau)

Please indicate your level of agreement with the following statements. (Nodwch i ba lefel rydych chi'n cytuno neu'n anghytuno â'r datganiadau canlynol.)

21a Castration of lambs should only be permitted after the first 24 hours of life. (Dim ond ar ôl 24 awr gyntaf bywyd y dylid caniatáu ysbaddu ŵyn.)

Disagree (Anghytuno)

21b Please explain your answer. (Esboniwch eich ateb.)

Young Castration Explanation:

The decision regarding how early in life a lamb can be castrated should be left to the livestock keeper and any reference to age should only be included in guidelines. The most important factor in deciding when a lamb can be castrated will be based on having taken adequate colostrum and effective bonding between ewe and lamb and this will vary between breeds, ages of ewe, and whether the lamb is a single or multiple. We disagree with mandating for a specific age and would also add that this is unenforceable and that many lambs will be born unobserved resulting in no one knowing when it has reached 24 hours of age. We would advise that this matter is dealt with via Codes rather than legislation.

22a Tail docking of lambs should only be permitted after the first 24 hours of life. (Dim ond ar ôl 24 awr gyntaf bywyd y dylid caniatáu tocio cynffonnau ŵyn.)

Disagree (Anghytuno)

22b Please explain your answer. (Esboniwch eich ateb.)

Young Tail Docking Explanation:

The decision regarding how early in life a lamb can be tail docked should be left to the livestock keeper and any reference to age should only be included in guidelines. The most important factor in deciding when a lamb can be tail docked will be based on having taken adequate colostrum and effective bonding between ewe and lamb and this will vary between breeds, ages of ewe, and whether the lamb is a single or multiple. We disagree with mandating for a specific age and would also add that this is unenforceable and that many lambs will be born unobserved resulting in no one knowing when it has reached 24 hours of age. We would advise that this matter is dealt with via Codes rather than legislation.

Castration and tail docking over 3 months (Ysbaddu a thocio cynffonnau dros 3 mis oed)

Fact banks (Banciau ffeithiau)

Please indicate your level of agreement with the following statements. (Nodwch i ba lefel rydych chi'n cytuno neu'n anghytuno â'r datganiadau canlynol.)

23a Castration of lambs over 3 months should only be permitted when carried out by a veterinary surgeon with an effective anaesthetic and analgesic. (Ni ddylid caniatáu ysbaddu ŵyn dros 3 mis oed oni bai fod hynny'n cael ei wneud gan filfeddyg gydag anesthetig a phoenlinarydd effeithiol.)

Agree (Cytuno)

23b Please explain your answer. (Esboniwch eich ateb.)

Older Castration Explanation:

We agree that castration of lambs over 3 months of age should be done by a vet and with the use of pain relief as deemed appropriate by the conducting vet. The use of the cascade prescribing system is acceptable in the cases of vets performing these tasks, and it is likely they will be few in number and not deemed routine.

24a Tail docking of lambs over 3 months should only be permitted when carried out by a veterinary surgeon with an effective anaesthetic and analgesic. (Ni ddylid caniatáu tocio cynffonnau ŵyn dros 3 mis oed oni bai fod hynny'n cael ei wneud gan filfeddyg gydag anesthetig a phoenlinarydd effeithiol.)

Agree (Cytuno)

24b Please explain your answer. (Esboniwch eich ateb.)

Older Tail Docking Explanation:

We agree that tail docking of lambs over three months of age should be done by a vet and with the use of pain relief as deemed appropriate by the conducting vet. The use of the cascade prescribing system is acceptable in the cases of vets performing these tasks, and it is likely they will be few in number and not deemed routine.

Impact assessment - general feedback (Asesiad effaith - adborth cyffredinol)

25a Do you agree with the estimates and assumptions presented in the consultation-stage de minimis assessment (for example, time, cost, uptake of new methods, feasibility of pain relief use)? (Ydych chi'n cytuno â'r amcangyfrifon a'r tybiaethau a gyflwynwyd yn asesiad de minimis y cam ymgynghori (er enghraifft, amser, cost, defnyddio dulliau newydd, dichonoldeb defnyddio dulliau lleddfu poen)?)

No (Na)

25b If you answered 'No', please explain your reasoning. Where possible, provide alternative estimates or examples from your experience (for example, costs, procedure times, uptake of new methods). (Os mai 'Na' oedd eich ateb, esboniwch eich rhesymau. Lle bo'n bosibl, rhwch amcangyfrifon neu enghreifftiau eraill o'ch profiad (er enghraifft, costau, amseroedd triniaethau, defnyddio dulliau newydd).)

DMA Estimates Explanation:

We do not agree there is evidence that the consumer would pay more for an uncastrated or untailed lamb product, and contrary to this some supply chains require, and pay more, for castrated lambs due to risks of ram taint in later season.

We cannot see how any labelling means could differentiate for higher or lower welfare relating to castration and tailing in fact there will be consequences that could lead to a flock not castrating ram lambs ending up with a high level of unwanted pregnancies in ewe lambs which would be an even worse welfare outcome. Any 'high welfare' label must be holistic in nature and cannot be based on one operation.

We are not convinced that there are opportunities for export growth or trade development based on tailing and castration - in fact it would be undermining and damaging to our industry if we were to make moves like this and still allow products to be imported and sold here that didn't meet our standards.

We do not agree with the assumptions that 60 seconds is enough time to administer anaesthetic and analgesic in a busy working farm environment. There remains a question over any time period between administering pain relief and carrying out the procedure - managing this in different lambing systems (outdoor or indoor) will be challenging and has not been taken into consideration.

There has been no consideration of the additional disposal costs at abattoir of rendering long tails. Estimates are this could add 850grams to the waste from each lamb, adding to disposal costs and environmental footprints.

No consideration has been made to the added time and costs of fly strike protection in long tailed lambs and potentially extra chemical use in controlling flystrike. many long tailed lambs will require tail shearing, taking around 2 minutes per lamb say twice a year, as well as an additional gather of sheep. In addition 'bellying out' and tail shearing lambs prior to slaughter will add significant time in order to maintain hygiene with entire lambs taking more time to shear around the scrotum.

26 Are you currently a sheep farmer or representing sheep farmers? (Ydych chi'n ffermwr defaid ar hyn o bryd neu'n cynrychioli ffermwyr defaid?)

Yes (Ydw)

Impact assessment - castration practices (Asesiad effaith - arferion ysbaddu)

27 Do you currently perform castration on your farm? (Ydych chi'n ysbaddu ar eich fferm ar hyn o bryd?)

Yes (Ydw)

Impact assessment - castration practices (Asesiad effaith - arferion ysbaddu)

28a Which castration method do you primarily use? (Pa ddull ysbaddu ydych chi'n ei ddefnyddio'n bennaf?)

Clip (for example, ClipFitter) (Clip (er enghraifft, ClipFitter))

Other Primary Castration Method:

I don't tail anything, and I'm selective over castrating ram lambs. I do find that if entire ram lambs don't finish within the first 'growth stage' and go into a store condition then they need a lot of feed (cereal and hard feed) to get finished.

28b On average, how long does it take to castrate each of your lambs (in seconds)? (Ar gyfartaledd, faint o amser mae'n ei gymryd i ysbaddu pob un o'ch ŵyn (mewn eiliadau)?)

Castration Duration:

60

28c How many people are typically involved in carrying out castration on your farm? (Faint o bobl sy'n ymwneud â'r gwaith ysbaddu ar eich fferm fel arfer?)

Castration Team:

1

28d At what age are your lambs usually castrated? (Ar ba oedran mae eich wŷn yn cael eu hysbaddu fel arfer?)

Less than 1 week (Llai nag 1 wythnos)

28e Do you currently use pain relief? (Ydych chi'n defnyddio dulliau lleddfu poen ar hyn o bryd?)

No (Nac ydw)

28f If legislation were introduced requiring pain relief for castration methods known to cause significant pain (for example, rubber ring), would you continue to castrate? (Pe bai deddfwriaeth yn cael ei chyflwyno sy'n galw am leddfu poen ar gyfer dulliau disbaddu y gwyddys eu bod yn achosi poen sylweddol (er enghraifft, cylch rwber), a fydddech chi'n parhau i ysbaddu?)

Yes (Byddwn)

Impact assessment - tail docking practices (Asesiad effaith - arferion tocio cynffonnau)

29 Do you currently perform tail docking on your farm? (Ydych chi'n tocio cynffonnau ar eich fferm ar hyn o bryd?)

No (Na)

Impact assessment - farm management and welfare risks (Asesiad effaith - rheoli fferm a risgiau i les)

31a Have you experienced significant issues with blowfly strike on your holding in recent years? (Ydych chi wedi cael problemau sylweddol gyda chynrhoni ar eich daliad yn ystod y blynyddoedd diwethaf?)

No (Na)

31b Do you currently have the ability to separate ewes and rams on your holding if needed? (Oes gennych chi'r gallu ar hyn o bryd i wahanu mamogiaid a hyrddod ar eich daliad os oes angen?)

No (Na)

31c If you send sheep to slaughter, what age are they typically? (Os ydych chi'n anfon defaid i'w lladd, beth yw eu hoedran fel arfer?)

Slaughter Age:

4-6 months

31d Do you currently send male lambs to slaughter before they reach puberty (for example, to avoid potential issues like ram taint)? (Ydych chi ar hyn o bryd yn anfon wŷn gwryw i'w lladd cyn iddynt gyrraedd glasoed (er enghraifft, er mwyn osgoi problemau posibl fel staen hwrdd)?)

Yes (Ydw)

31e Do you foresee any practical or infrastructure barriers to changing castration or tail docking practices if legislation were introduced (for example, gathering earlier, administering pain relief, switching methods)? (Ydych chi'n rhagweld unrhyw rwystrau ymarferol neu rwystrau o ran seilwaith i newid arferion ysbaddu neu docio cynffonnau pe bai deddfwriaeth yn cael ei chyflwyno (er enghraifft, casglu'n gynharach, lleddfu poen, newid dulliau)?)

Barriers:

Not for me - I don't tail dock and use clips for any I choose to castrate. But that's just the way I do it and not all farms would be able to do the same.

Impact assessment - veterinary access and cost assumptions (Asesiad effaith - mynediad milfeddygol a thybiaethau o ran costau)

32a Would a requirement for veterinary involvement in some procedures (for example, surgical castration or docking) affect your ability to carry out these practices? (A fyddai gofyniad i filfeddyg gyfranogi mewn rhai triniaethau (er enghraifft, ysbaddu neu docio llawfeddygol) yn effeithio ar eich gallu i gyflawni'r arferion hyn?)

No (Na)

32b If yes, please explain how it would affect you (for example, cost, logistics, timing): (Os byddai, esboniwch sut byddai'n effeithio arnoch chi (er enghraifft, cost, logisteg, amseru):)

Veterinary Involvement Explanation:

Further comments (Sylwadau pellach)

33 Please provide any comments or evidence on the environmental impacts the proposed policy may have. (Rhowch unrhyw sylwadau neu dystiolaeth am yr effeithiau amgylcheddol y gallai'r polisi arfaethedig eu cael.)

Environmental Impacts:

This policy proposal could have negative impacts on the upland sheep sector in particular due to late maturing breeds and the practice of selling store lambs to finishers elsewhere in the country. Store lamb finishers will be very wary of buying entire ram lambs and being uncertain of how they will finish or whether they will end up with a high number of unwanted pregnancies. This is likely to reduce prices and lead to upland farmers choosing to finish their own lambs by housing or purchasing feed. This contradicts other policy objectives that are pushing farmers to more traditional breeds and systems in the uplands in particular, and undermines efforts to maintain outdoor sheep systems and reduce reliance on purchased feed.

We have already raised the issue of higher volumes of abattoir waste - potentially 850 grams for lamb needing to be disposed of.

A further negative environmental impact could be that farmers choose to use more ectoparasite control, again at a time when we are working to reduce any negative impact on soil life and invertebrate life, making medicine use more responsible and considering wider environmental impacts.

With the right Government support there could be a potential long term environmental benefit with a reduction in castration if incentives were provided for creating smaller field sizes and hedgerows in order to be able to keep groups of male and female lambs separated.

34 Please provide any comments or evidence on the equality impacts the proposed policy may have. (Rhowch unrhyw sylwadau neu dystiolaeth am yr effeithiau y gallai'r polisi arfaethedig eu cael ar gydraddoldeb.)

Equality Impacts:

Our main consideration would be around the (valuable) diversity that we have in the sheep industry and the fact there needs to be constant consideration of those that could be negatively impacted. As mentioned above we are concerned that upland farmers and potentially those with more native and slow maturing breeds may be affected. We would also be concerned about the emergence of a new 'welfare friendly lamb' label that was too constrained in its scope. This could have serious negative impacts for some extensive sheep systems that could well be argued to be high welfare in other aspects.

35 Please provide any comments or evidence you feel should be considered concerning the socio-economic impact the proposed policy may have on both producers and consumers. Please explain your answer. (Rhowch unrhyw sylwadau neu dystiolaeth rydych chi'n teimlo y dylid eu hystyried ynghylch yr effaith economaidd-gymdeithasol y gallai'r polisi arfaethedig ei cael ar gynhyrchwyr a defnyddwyr. Esboniwch eich ateb.)

Socio-economic Impacts:

Any economic pressure on farms, particularly in remote grassland and sheep farming regions will cause more enterprises to close and reduce the contribution of farming to the rural economy. The knock on effect of this is the closure of other rural businesses supporting any thriving rural economy. We would be concerned if UK producers were required to adopt methods that added costs while still importing products from countries with different welfare and cost structures.

Farm costs are an ongoing challenge and these proposals need to be considered in the context of adding time and costs, all that will be subject to future inflationary pressure.

36 Please provide any further considerations you feel should be noted when considering this policy proposal. Please explain your answer. (Rhowch unrhyw ystyriaethau pellach rydych chi'n teimlo y dylid eu nodi wrth ystyried y cynnig polisi hwn. Esboniwch eich ateb.)

Further Considerations:

In summary NSA does not feel the industry is anywhere near ready for the full set of mandated measures being proposed. There are elements we support such as alignment with Scotland legislation relating to the use of rings with pain relief up to 3 months of age, and clips to that age.

We also support voluntary progress supported by trials and research and demonstrations.

Overall we would propose the creation of an industry wide roadmap to set out how the UK should progress, while accepting that a small number of modifications to the current legislation would be beneficial.