

## Response ID ANON-NE8F-P3PD-8

Submitted to **Proposal for an alternative method for ageing sheep at slaughter**

Submitted on **2019-10-11 15:12:52**

### Introduction

#### 1 What is your name?

**Name:**

Philip Stocker

#### 2 What is your email address?

**Email:**

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#### 3 What is your organisation?

**Organisation:**

National Sheep Association

#### 4 Would you like your response to be confidential?

No

If you answered Yes to this question please give your reason.:

### Proposal for an alternative method for ageing sheep at slaughter: Questions

#### 5 Would you take advantage of the proposed optional alternative method to age lambs at slaughter by a means other than dentition?

Yes

**a) If your answer is 'yes', would you operate it exclusively or maintain a dual system of ageing by either dentition or cutoff date? If you would operate a dual system, please outline your reasons for doing so and explain how you would implement both methods.:**

The NSA would like to see the new ageing system introduced as quickly as possible, to move from tooth eruption to a date of 30th June in the year following birth. If the option exists for FBOs to run a dual system then we can see that this would be attractive to some and we would support that choice.

In our opinion the 2 areas that this would benefit include:

- Some supply chains, and in particular some export chains, that may demand evidence of no tooth eruption. In this case it is highly likely that lambs would be within the timescales relating to a June 30th cut off date and would be down to commercial demand.
- Some remote areas of the UK where late maturing breeds might be lambed very late for specialist markets. In this case we would envisage some abattoirs choosing to age by tooth eruption without splitting beyond the end of June where lambs may be born in the previous year.

In summary we support FBOs having an option of which system to use, with each being deemed of equal high standards, safety and quality. If a dual option was not possible and a choice had to be made between the two then we would prefer the cut off date.

**b) If your answer is 'no', what would be your reasons for continuing to age animals by dentition?:**

#### 6 What would be the practical advantages and disadvantages for your business from using the proposed optional alternative method?

**Please respond:**

The advantages of the proposed optional alternative include:

- Avoiding the need for farmers, livestock markets, and abattoirs to be physically checking each individual sheep for tooth eruption. This will save significant time and costs.
- Removing the uncertainty, and the loss of carcass value, of the time of tooth eruption not being known. This is experienced where farmers check lambs and teeth are not erupted but by the time they are presented to slaughter there may be signs of eruption with carcasses needing to be split.

Moving to a cut off date of 30th June in the year following birth takes away uncertainty and provides a clear framework for the supply chain to meet.

There has never been evidence of risk to human health through BSE transferring species into sheep, nor of Scrapie being any risk. The move to a 30th June cut off date moves one step closer to proportionate and practical controls following many years of a system that avoids an unproven and theoretical risk.

#### 7 What would you estimate to be the annual costs and savings for your business from using the proposed optional alternative method?

**Please respond:**

The NSA has estimated that the entire costs to industry, including the costs of checking for tooth eruption, the loss of carcass value, and the removal and disposal of SRM, has an annual cost to industry of around £24M. The move to a 30th June cut off date would vastly reduce these costs through avoiding the need to check

for tooth eruption at all, and greatly reducing carcass value loss and SRM removal and disposal.

## **8 Have you any other comments on the proposed optional alternative method?**

### **Please respond:**

We support the concept of a farmer self declaration regarding the year of birth of lambs and that the responsibility of making that declaration would be placed on the owner of the sheep at the point of selling to the abattoir with an expectation that this could be evidenced through records retained. We would like to see this declaration included in the statutory movements form as soon as possible to avoid unnecessary additional paperwork.

## **9 Would you have any concerns with placing on the market and export of some ovine heads with erupted permanent incisors for human consumption?**

### **Please respond:**

No. Our view is that any current markets for sheep heads are not sensitive to tooth eruption anyway. Any markets that do require for no teeth to be erupted can be supplied by abattoirs who are prepared to supply this demand (as outlined in Q5 above).

In addition this needs to be supported with communication and assurances of the rigour behind food safety and controls.

## **10 Do you have any further comments or concerns on this proposal which are not covered by the questions set out above?**

### **Please respond:**

The NSA would urge this move to be made as early as possible in order for store lamb finishers to know what framework they are working in as they approach the New Year. In an ideal world this would have been completed and communicated before the 2019 autumn store lamb sales had started. It is essential now these proposals have slipped by a year that the change is concluded and communicated before the start of 2020.

## **11 Do you have any comments on the analysis set out in Annex 3 of the consultation document?**

### **Please respond:**

The costs assessments (and potentially to be saved) appear to be based on the cost of checking for teeth only.

0.14 hours per farmer to check 100 lambs for tooth eruption is not realistic. This equates to 5 minutes to check 100 lambs - it takes no account of the time taken to gather lambs and even in an efficient handling system this assessment seems ambitious.

In addition the costs do not take into account:

- reduced carcass values where carcasses need to be split. There is evidence of a reduced value per lamb of up to £40 where teeth have erupted.
- the time and infrastructure costs of actual splitting and SRM removal
- costs of SRM disposal

The proposed new optional system should reduce the numbers of lambs needing to be split because it reduces the uncertainty of when teeth erupt and gives certainty over when old season lambs have to be presented to market. Therefore the savings go well beyond removing the cost of checking lambs for tooth eruption.

## **12 Do you have any comments on the timing for introducing this new option?**

### **Please respond:**

We clearly do not want to do anything that risks the loss of trade with the EU as we depart. However we believe that the EU had already accepted the proposed approach and provided we can provide a robust system with protocols then we should be able to demonstrate the highest levels of food safety and traceability. We understand that the flexibility allowing this proposed method of ageing is afforded to member states only and there is a chance that we may not be a member state (in the case of a no deal) at the planned time of implementation. However our recent membership and regulatory alignment and the fact that we can demonstrate good traceability and protocols means we should be able to negotiate for the adoption of the proposed new optional system.

As a fall back in the event of the EU not accepting this change when we are a 3rd country, our dual system should allow us to segregate export lambs and cuts from lambs with no tooth eruption (ie this would be part of the optional system). We do not believe there should be any loss of domestic consumer confidence by using such a dual system.

## **13 Do you have any specific comments on the potential impacts of this proposed optional alternative method of sheep ageing on people with protected characteristics as defined by the Equality Act 2010, in particular where those impacts are thought to be disproportionate because of those 9 protected characteristics? If so, do you have any supporting evidence?**

### **Please respond:**

No comments over and above we do not see these proposals conflicting with the 9 objectives of the Equalities Act 2010. If any conflicts were identified then the dual approach being proposed would, in our opinion, overcome them.

## **Consultee Feedback on the Online Survey**

### **14 Overall, how satisfied are you with our online consultation tool?**

Very satisfied

### **Please give us any comments you have on the tool, including suggestions on how we could improve it. :**

No comments - an excellent survey tool.