Welsh Government
Consultation – Summary of Responses and Welsh Government Response

Introducing mandatory sheep carcase classification in Wales

October 2018
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Introduction

On 31 May 2018, the Cabinet Secretary for Energy, Planning and Rural Affairs launched a formal consultation to seek views on introducing mandatory sheep carcase classification in Wales. The consultation ran for 12 weeks, opening on 31 May 2018 and closing on 23 August 2018.

The main objective of the consultation was to seek views on the introduction of mandatory sheep carcase classification in Wales and to build a picture of the method of classification and reporting that should be adopted. Views were also sought on the publishing of schedules, communication of classification results and wider data reporting.

This consultation was directed at individuals involved in the production and processing of sheep carcasses; aimed principally at anyone with an interest in the regulation of the sheep sector. Welsh Government informed industry stakeholders of both the purpose and schedule of the consultation prior to its launch.
Background

Wales has its own legislation governing mandatory reporting for beef and pigs, the ‘Beef and Pig Carcase Classification (Wales) Regulations 2011’. Within this legislation, abattoirs can report on sheep carcases on a voluntary basis.

In October 2016, a UK wide “Call for Evidence” on the remit of the Groceries Code Adjudicator was undertaken. This consultation invited views and information on any unfair trading practices affecting the groceries supply chain, the need for further action and the form such action might take. The call for evidence closed in January 2017 and within the evaluation there was a recommendation to introduce mandatory sheep carcase classification across the UK.

Separately, farming stakeholders approached Welsh Government to suggest the introduction of mandatory sheep reporting in Wales. Our farming Unions have emphasised that consistency of reporting and transparency within the supply chain are vital to increasing producer knowledge and confidence of the processing sector and subsequently called for a public consultation.

Prior to consultation, Welsh Government engaged with the livestock boards of the Welsh farming unions, Hybu Cig Cymru and the Country Land and Business Association (CLA Cymru).

Defra and the Scottish Government have undertaken separate consultations on this matter.
Overview of Responses

The Welsh Government would like to thank all of those who engaged and responded to the consultation.

The consultation was open for responses between 31 May and 23 August and included provision for responses via email, post or via the consultation portal. The online portal provided provision for responses to be submitted anonymously, without linking to a geographical region or location within the UK. Responses were only received via email and through the consultation portal.

14 complete and 7 incomplete responses were received during the consultation period. The incomplete returns have been omitted from the analysis.

Completed responses represented the following:

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Number of Responses</th>
<th>Number Representing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual Livestock Farmer</td>
<td>2</td>
<td>2 Farmers</td>
</tr>
<tr>
<td>National Sheep Association Cymru</td>
<td>1</td>
<td>Approx. 1400 Welsh members</td>
</tr>
<tr>
<td>NFU Cymru</td>
<td>1</td>
<td>Approx. 15,000 Welsh members</td>
</tr>
<tr>
<td>Hybu Cig Cymru</td>
<td>1</td>
<td>1 Organisation representing producer and processor levy payers (Approx. 25,000 red meat holdings)</td>
</tr>
<tr>
<td>NFU Scotland</td>
<td>1</td>
<td>Approx. 10,000 Scottish Members</td>
</tr>
<tr>
<td>Meat and Livestock Commercial Services Ltd</td>
<td>1</td>
<td>1 Organisation</td>
</tr>
<tr>
<td>Farmers’ Union of Wales</td>
<td>1</td>
<td>Not known</td>
</tr>
<tr>
<td>Online portal - Complete</td>
<td>6</td>
<td>6</td>
</tr>
<tr>
<td>Online portal – Incomplete</td>
<td>7</td>
<td>7</td>
</tr>
</tbody>
</table>

Summary of Responses

The consultation questionnaire consisted of 10 questions with a variety of both open and closed question types. Questions 1-7 asked specific questions in relation to the objectives of the consultation, questions 8-9 focussed on impacts on the Welsh language and question 10 allowed for additional comments.

This chapter presents an analysis of the responses to the questions asked within the consultation. A third of the consultation questions provided the option for respondents to select their view in addition to providing additional comments. These have been presented in the tables below indicating whether a respondent has answered yes or no, those that
chose not to select a specific category of view have been noted as ‘did not indicate a conclusive view’.

Responses where additional comments have been provided and represent the views of a wider group have been identified separately and key themes addressed in the next section.

**Question 1 – Are you in favour of mandatory sheep carcase classification in Wales?**

<table>
<thead>
<tr>
<th>Options</th>
<th>Number of Respondents</th>
<th>Percentage of Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>10</td>
<td>91%</td>
</tr>
<tr>
<td>No</td>
<td>1</td>
<td>9%</td>
</tr>
<tr>
<td>Did not indicate a conclusive view</td>
<td>3</td>
<td></td>
</tr>
</tbody>
</table>

**Question 2 – If you are an abattoir do you currently use a sheep carcase classification system?**

No responses were received from processors / abattoirs.

**Question 3 - We propose an exemption for abattoirs with a throughput of fewer than 1,000 sheep per week as an annual average. Do you believe this threshold is set at the correct level?**

<table>
<thead>
<tr>
<th>Options</th>
<th>Number of Respondents</th>
<th>Percentage of Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>6</td>
<td>50%</td>
</tr>
<tr>
<td>No</td>
<td>6</td>
<td>50%</td>
</tr>
<tr>
<td>Did not indicate a conclusive view</td>
<td>1</td>
<td></td>
</tr>
</tbody>
</table>

The additional comments which supported these responses were of mixed opinion with regards to the proposed exemption threshold. An equal percentage either agreed and supported the justification of the threshold or disagreed and proposed a lower threshold of 500. One comment which largely reflects the comments given by those that agreed with the exemption threshold was:

“Given the current structure of the Welsh abattoir sector, the stated threshold would seem appropriate. A threshold of 1,000 sheep a week will ensure that the vast majority of sheep slaughtered in Wales would be reported. In 2017, four abattoirs in Wales would have exceeded the stated threshold and accounted for over 95% of the throughputs at Welsh abattoirs. The stated threshold will also ensure that smaller plants, that generally would not have the IT requirements or resources to report in a timely manner, are not prohibitively burdened by the implementation of the new regulation.

While it is understood that agriculture and its related regulations are devolved, consideration should be given to the thresholds”.

In contrast a comment given for the lowering of the threshold is given below:

“We believe that the threshold should be set at 500 sheep per week which would then bring in 97.2% of the sheep slaughtered annually in Wales under the regulation. This would then bring in 5 abattoirs as opposed to 4 if the threshold remained at 1,000.

Lamb slaughter is seasonal at some plants and as the figure is based on an annual average significant weekly numbers could be killed during the summer and autumn in some plants
which would not come under the regulation if their average figure over 12 months is 1000 sheep or less per week.”
Key Themes

A number of key themes emerged from the analysis of the consultation responses. Where more than 50% of respondents have either recorded the same response or provided similar comments these have been grouped to give the indicative key themes below:

**Introduction of mandatory sheep carcase classification** - The majority of responses indicated the red meat industry would want to see sheep carcase classification implemented across Wales on a mandatory basis.

**Exemption for abattoirs with a throughput of fewer than 1,000 sheep per week as an annual average** - No consensus was established on an exemption threshold with a 50% agreement and a 50% disagreement giving rise to the conclusion that the industry is divided on this topic and further research, and stakeholder engagement would be required to determine future policy. Several stakeholders believe that the exemption level should be lower and offered 500 sheep per week as an alternative; the belief is that classification would be taken up by smaller abattoirs and the thresholds must be lower to facilitate this.

**Information abattoirs are reporting to their suppliers** – There was a consensus for abattoirs to be reporting information on weight, fat class, meat yield, tag number, kill number and condemnations. The majority of respondents wanted this information to be shared within 24 hours.

**The publication of information** – Consultation responses indicated an industry wide agreement with regards to the publication of aggregated information as well as a schedule of prices and charges, with 92% of responses indicating an agreement. There were no key themes identified with regards to the content of the information published as part of the aggregated information and so this would need further stakeholder engagement.

**Use of the SEUROP grid** - In the additional comments section a key theme identified was a unified agreement that the SEUROP grid continue to be used for carcase classification in Wales along with a standardised dressing specification.
Conclusion

We can make an assumption that the responses received cover the views of the vast majority of sheep farmers across Wales. From a total of approximately 14,000 sheep holdings registered in Wales the NSA alone provided a view representing 1400 members with the addition of NFU Cymru with 15,000 and an unknown membership of FUW. From these figures we can be confident the results are representative of the Welsh industry and the introduction of mandatory sheep classification in Wales is supported.

It is clear from the analysis of the responses the consensus is to introduce mandatory sheep reporting in Wales but there is a feeling that this should not be undertaken alone and should be adopted across the UK for consistency. There is also a collective view that all information collected by processors should be transparent, publicly available and consistently reported back to the farmers and the wider industry. There is, however, a disparity in views with regards to the type of information which is collected and reported, the thresholds governing reporting and the dressing specifications used; these areas would need further stakeholder engagement.

Defra and Scottish Government have undertaken similar consultations and respondents to our consultation are of the view that the English and Scottish results should be considered in conjunction with our own to gain a GB perspective on the introduction of mandatory sheep reporting.

The summary of responses to the English consultation can be found at: https://consult.defra.gov.uk/

Scotland’s consultation response can be found at: https://beta.gov.scot/publications/consultation-analysis-introduction-mandatory-sheep-carcase-classification-price-reporting/
Welsh Government Response

There has been an industry wide call for the introduction of mandatory sheep carcase classification in Wales and Welsh Government has responded to this call by undertaking this formal consultation. The results of this consultation have evidenced the desire of the industry to mandate the classification of sheep reporting and enforce the reporting of prices to the producer.

Welsh Government will need to engage further with regards to the information which is reported to producers by both processors and levy bodies and this work will be taken forward. Welsh Government will continue to work to implement the legislative framework required to underpin mandatory sheep carcase classification in Wales.