Mr Jim Paice MP  
Minister of State for Agriculture and Food  
Defra  
17 Smith Square  
London  
SW1P 3JR  
4 August 2010

Dear Minister,

THE WELFARE OF DAIRY COWS HOUSED ALL YEAR ROUND AND/OR IN VERY LARGE HERDS

1. Recently, there has been comment in the press and elsewhere about the welfare of dairy cows if they are housed all year round with little or no access to grazing and/or kept in very large herds.

2. Of course, all dairy cows have to be kept in compliance with British law. The critical question is; can a dairy cow that is housed all year round with little or no access to grazing and/or is kept in a very large herd have a satisfactory standard of welfare? Here ‘satisfactory’ is interpreted in terms of the legal minimum standard. In other words, can a dairy cow have, at the very least, a life worth living? This new concept is underpinned by the foundations of the Five Freedoms and was introduced in our recent Report; Farm animal welfare in Great Britain: past, present and future (2009).

3. FAWC’s advice is based on scientific evidence and its members’ extensive knowledge and experience. It builds upon our recent advice on the welfare of the dairy cow (Opinion on the welfare of the dairy cow; 2009).

Can a dairy cow that is housed all year round with little or no access to grazing have a satisfactory standard of welfare?

4. Only a few dairy cows, perhaps a few percent of the national herd, are housed all year round in Great Britain, though the number is increasing.

5. In general, management of dairy cows that are housed all year round is easier for the farmer with potentially less nutritional stress on the high yielding dairy cow. In terms of animal welfare, there are both advantages and disadvantages, including:
Advantages

- Feed composition more controlled
- Diet targetable to specific groups, according to need
- Reduced risk of parasitic infestation
- Reduced risk of summer mastitis
- Protection from adverse weather
- Greater biosecurity, e.g. reduced exposure to diseases transmitted by air and wildlife

Disadvantages

- Unable to carry out natural foraging behaviour
- Physical barriers within the building to movement with less space
- Less environmental choice
- Absence of soft, non-slip surface (of pasture)
- Increased risk of physical injury and lameness
- Increased risk of some types of environmental mastitis

6. There is a particular risk to the Fourth Freedom, which is to express normal behaviour by providing sufficient space, proper facilities and company of the animal's own kind. FAWC would like further research to be undertaken on how all year housing affects the ability of dairy cows to express normal behaviour and the extent to which impediments affect welfare.

7. If a dairy cow is to be housed all year round with little or no access to grazing, it is particularly important that housing and general facilities are appropriate such that the cow remains healthy and has the opportunity for good welfare whilst providing the desired milk yield. In addition to the provision of resources, good management, highly skilled veterinary care, and adequate numbers of stockmen, stockmanship of the highest standard is essential.

8. Provided that these conditions are met and pending the new evidence about the Fourth Freedom, FAWC’s advice is that a cow housed all the year round with little or no access to grazing can have a satisfactory standard of welfare.

Can a dairy cow that is kept in a very large herd have a satisfactory standard of welfare?

9. The average size of dairy herds continues to rise in the UK. In 2008, it was 126 cows; arguably this average is distorted by the large number of small herds. Cows in very large herds are often also housed all year round because of the difficulties of access to pasture, but this is not always the case.

10. A very large herd, of say more than 1,000 dairy cows, has significant economies of scale. As with any large herd, it is normally divided into groups of matched cows. Paradoxically, very large herds have the potential to benefit the individual’s welfare. For example, a team of experts, including a nutritionist and a specialist veterinarian, can – and indeed should - be employed on health management and disease prevention and control. Similarly, a very large dairy unit is nearly always established on a new site, meaning that the most modern buildings and equipment are provided with good biosecurity and an ability to divide the herd.
suitably. Opportunities for training, staff development and staff motivation are often greater in a large enterprise with a full management structure, which potentially offers improved stockmanship.

11. There appear to be few disadvantages to the cow of being kept in a very large herd, provided that the herd is divided into appropriate groups, each of which is managed according to nutritional and other needs. Groups should be as small as practicable and transfers between groups should be minimised in order to reduce stress. The disadvantages of a very large dairy unit are manifest when such management is not provided, e.g. insufficient intake of feed and water, and bullying in unstable groups.

12. FAWC’s advice is that a dairy cow that is kept in a very large herd can have a satisfactory standard of welfare, provided that the herd is divided into appropriate groups, each managed according to nutritional and other needs, and stockmanship is of the highest standard.

13. We also have the same concern about impediments to normal behaviour as for a cow housed all year round (paragraph 6).

Environmental and economic issues

14. As with nearly all issues of farm animal welfare, there are often dilemmas arising from environmental, economic and other issues; compromises usually have to be made when choosing between alternative systems of husbandry. FAWC takes these issues into account when providing advice on farm animal welfare and is mindful of the Government’s and Devolved Administrations’ policies on food production and farming. In addition, FAWC adopts the precautionary principle, giving the animal the benefit where there are reasoned and reasonable doubts.

15. Current advice on climate change and methane emissions, e.g. to the Minister in Wales, suggests that there is usually a reduction when cattle are housed compared with those on pasture. Similarly, there may be environmental benefits of very large herds because large-scale industrial methods to process waste can be used. Further work is needed to assess the overall impact (and vice versa) on climate change of dairy cattle housed all year compared with other husbandry systems.

Stockmanship and public surveillance of animal welfare

16. This advice relies upon certain provisions being met since the dairy cow housed all the year and/or kept in very large dairy herds is under great stress. We particularly emphasise the crucial importance of skilled stockmanship to welfare.

17. Whatever the policy adopted, independent surveillance of welfare should be accorded the highest priority, especially when new dairy farms of the above types are established.
18. In the time available, we have not considered the views of consumers about labelling and other issues in relation to the welfare of dairy cows. Nevertheless, it is our view that their objections to highly intensive farming practices will continue unless significant steps are taken to ensure that consumers become adequately and appropriately ‘informed’ about animal welfare issues.

I should be more than willing to discuss this matter with you if required. I have also written to Ministers in Scotland and Wales.

Yours sincerely,

[Signature]

Professor Christopher Wathes

Cc: CVOs in England, Wales and Scotland;
Ian Strachan, Huw Jones, Sue Ellis;
David Pritchard, Liz Kelly;
FAWC members;
FAWC website