River Court, Mill Lane, Godalming, Surrey, GU7 1EZ
T: +44 (0)1483 521 950 F: +44 (0)1483 861 639
Email: compassion@ciwf.co.uk

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Jim Paice MP
Minister of State for Agriculture and Food
Department of Environment, food and Rural affairs
17 Smith Square
London
SW1P 3JR

Dear Minister

FAWC letter on the welfare of dairy cows housed all year round and/or in very large herds

Compassion in World Farming strongly disagrees with the recent FAWC letter to you which advises that cows can have satisfactory welfare when housed all the year round with little or no access to grazing or kept in very large herds.

Humane farming systems need to provide for the expression of normal behaviour. For dairy cows this includes the opportunity for grazing which is not possible in year-round housing. The importance of animals being able to express normal behaviour is recognised both by the *Five Freedoms* and by the Animal Welfare Act 2006 which provides that an animal's needs shall be taken to include "its need to be able to exhibit normal behaviour patterns".

We agree with the FAWC that cows that are housed all year and/or kept in large groups are "under great stress". It is difficult to reconcile FAWC's recognition that such cows are under great stress with its advice that cows housed all year round or kept in very large herds can have satisfactory welfare.

Housing cows all year round

Cows are natural grazers. Their digestive system is adapted to obtain nutrients from high fibre foods such as grass and the leaves of shrubs and trees. Any system in which cows are kept should provide them with the opportunity to perform normal behaviours such as grazing and browsing.

Housing cows for long periods increases welfare risk. In 2009 the European Food Safety Authority (EFSA) conducted a major review of the scientific literature and concluded that:

> *If dairy cows are not kept on pasture for parts of the year, i.e. they are permanently on a zero-grazing system, there is an increased risk of lameness, hoof problems, teat tramp, mastitis, metritis, dystocia, ketosis, retained placenta and some bacterial infections.*

Professor John Webster has highlighted another problem inherent in large indoor farms:

> *"My greatest concern is that these large indoor farms will deny the animals the freedom to choose what they want to do and where they want to be. The advantage of pasture-based systems is that the cow can choose the kind of environment she needs for comfort and security. In these large indoor units the opportunity for choice is profoundly restricted." (John Webster, 2010, personal communication).*

Keeping cows in large groups

Cows naturally live in relatively small stable groups of animals which are generally related to one another and form a stable hierarchy. It is thought that cows can recognize up to 60-80 other individuals and it is best to keep them in groups which are no larger than this.

Clearly it is possible to keep more than one such group of cows in fields around a central milking parlour, but the larger the number of cows in all these groups, the further they will have to walk to obtain grazing. This alone should rule out the large farms currently being planned.

Transferring cows between groups breaks social bonds and results in aggression as new hierarchies form. FAWC rightly suggest that where a herd is large, cows should be divided into small groups and that transfers between groups should be minimized. However, some of the huge farms being discussed are planning to split the cows down into groups which are still very large. Since the animals are heavy yielders, it is likely that frequent transfers between groups will be required as individual feed requirements change during the course of a lactation.

Keeping very large groups together is likely also to increase the risk of disease.

High milk yields

Animals housed all year and/or kept in large groups are very likely to be cows bred for high milk yields. Such animals are vulnerable to poor welfare. The EFSA review concluded that:

> *"Long term genetic selection for high milk yield is the major factor causing poor welfare, in particular health problems, in dairy cows. … The genetic component underlying milk yield has also been found to be positively correlated with the incidence of lameness, mastitis, reproductive disorders and metabolic disorders (EFSA, 2009c)."*

In addition EFSA points out that "with increasing production cows need to spend more time eating and thus have less time available for other activities, and may not be able to allocate time enough to fulfill their need for important activities such as resting".

In order to provide for their nutritional needs, the diet of high yielding cows is supplemented by concentrates. However, high levels of concentrate in relation to fibre can lead to digestive problems including excessive fermentation in the rumen and acidosis as well as to loss of body condition, laminitis, and high herd culling rates.

FAWC argues that housing cows indoors in large herds may benefit welfare as it enables cows to be given feed that responds to the needs of high yielding cows. This ignores the fact that the need to provide such feed only arises because cows have been bred to produce yields that they cannot sustain through their natural fibrous diet. Having caused one set of problems by high production, the industry seeks to tackle them in ways that lead to further problems i.e. the health problems that can arise from concentrate-rich diets and the health and welfare problems entailed in preventing access to pasture in the grass-growing season.

The proper solution is to breed a more sustainable cow. Cows' level of milk yield should be such that it can be sustained on a pasture-based diet with the animals being given access to pasture during the grass-growing season and kept in moderate-sized groups.

Sustainability issues

FAWC's letter refers to arguments that housing cows reduces greenhouse gas (GHG) emissions, notably methane, compared with pasture. However, studies show that the carbon sequestering benefits of cattle kept on permanent grassland without being given additional feed inputs balance or even outweigh their methane emissions (Allard et al, 2007; Soussana et al, 2007). Moreover, concentrates and maize silage have to be grown to feed indoor-housed cows; this produces GHG emissions and prevents the land from delivering the carbon sequestration gains associated with permanent grassland. The poor longevity of many high yielding cows results in high heifer replacement rates which is GHG inefficient as heifers have to be fed for two years before their first lactation during which time they are responsible for substantial GHG emissions.

Yours sincerely

Peter Stevenson
Chief Policy Advisor