

Ruminant Health and Welfare Group Consultation Response to Defra Lamb tail docking and castration consultation

About us

The Ruminant Health & Welfare Group (RHWG) is an independent, industry-based UK body that brings together expertise from across the cattle and sheep sectors to improve the health and welfare of the national flock and herd.

The RHWG focuses on identifying industry-wide priorities for improving cattle and sheep health and welfare, while coordinating collaboration across the four UK nations and 24 membership organisations, bringing together farmers, veterinary professionals, industry bodies and government stakeholders to drive joint action. It promotes evidence-based interventions that strengthen disease control, resilience, production efficiency and overall welfare outcomes, and supports national ambitions on Net Zero and the responsible use of antibiotics.

Executive summary of response:

The Ruminant Health and Welfare Group (RHWG) is a cross-industry body representing farmers, vets and organisations across the four UK nations. While supporting the principle of improving animal welfare, the RHWG cannot provide definitive views on each proposal due to the diversity of systems represented. Instead, member organisations and individual members have been encouraged to submit their own detailed responses.

Across all sections of the consultation, the RHWG stresses the need for **further, detailed stakeholder engagement before any policy decisions are progressed.**

Key points

1. **Need for greater consultation and evidence review** - RHWG urges Defra to pause progression of proposals until knowledge gaps are closed, concerns addressed, and a collaborative long-term roadmap is developed. This includes reviewing assumptions on impacts, feasibility, veterinary capacity, product availability and welfare outcomes.
2. **Castration and tail docking should be treated separately** - The two procedures have different complexities, risks and practical considerations. Grouping them together risks inappropriate policy design.
3. **Concerns with proposed minimum 24-hour age limit** - A universal lower age limit of 24 hours is viewed as impractical and potentially detrimental, particularly in outdoor and extensive systems where lamb handling after 24 hours is not feasible or safe. A more appropriate approach is allowing stockkeepers to assess lamb strength, bonding and condition.
4. **Veterinary access and medicine availability** - There are significant constraints on veterinary capacity, especially in remote regions. Only limited authorised anaesthetic/analgesic options exist for sheep, and the RHWG highlights concerns about adverse reactions and lack of suitable, authorised products. Mandatory pain relief should not rely on routine cascade use.
5. **Impact assessment concerns** - Members report inaccuracies and unrealistic assumptions within Defra's de minimis assessment. RHWG recommends reassessment and consideration of whether a full economic impact assessment is needed.
6. **Potential broader impacts**
 - a. Increased use of plastics and medicines (e.g., antibiotics, antiparasitics).
 - b. Disproportionate impacts on small, upland and extensive systems.
 - c. Risks to viability of the lamb store market.
 - d. Risk of consumer confusion about imported products produced to different standards.
 - e. Potential for higher consumer prices during a cost-of-living crisis.
7. **Implementation timeline unfeasible** - Given the gaps in evidence, constrained veterinary capacity, and limited authorised medicines, the RHWG believes the proposed 2028 implementation date is unrealistic.