

Submission

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To: Lamb-Castration-and-Tail-Docking@defra.gov.uk

Cc: Scottish Government Animal
Welfare Division

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Consultation on Proposed Changes to Castration and Tail Docking Methods

NFU Scotland (NFUS) is the leading agricultural organisation in Scotland. Representing more than 9,000 farmers, growers, and crofters, our members provide and support thousands of jobs and deliver significant economic, social and environmental benefits across Scotland.

Agriculture is the lynchpin of rural Scotland and is an important part of Scotland's booming food and drink industry. Scottish agriculture generates a gross output of £3.3 billion annually. The farming and crofting sector is committed to sustainable food production, enhancing biodiversity, and helping to tackle climate change.

EXECUTIVE SUMMARY

NFU Scotland supports maintaining the current Scottish regulatory framework for lamb castration and tail docking. While committed to improving animal welfare, the organisation believes regulatory changes must be evidence-based, practical in real farm conditions, and supported by suitable licensed veterinary medicines and viable alternatives. At present, NFU Scotland does not consider that these conditions have been met.

Importance for Animal Management and Welfare

Castration and tail docking remain essential in Scottish sheep systems. Castration prevents unwanted pregnancies and inbreeding in extensive systems and supports current market requirements. Tail docking helps reduce the risk of fly strike and improves animal cleanliness, supporting both welfare and food safety at slaughter.

Lack of Licensed Veterinary Medicines

There are currently no anaesthetic or analgesic products licensed specifically for young lambs in the UK and those that have been used under the cascade system have proven extremely risky and not without damaging side effects. Requiring their routine use would rely on the veterinary medicines cascade, which is intended for exceptional cases rather than routine procedures. NFU Scotland believes it is inappropriate to legislate for the mandatory use of medicines that are not fully tested, licensed, and proven safe for the intended purpose.

Concerns with Proposed Alternatives

Alternative methods such as clip systems require further research and refinement. Evidence to date is limited, and some producers have reported practical and welfare issues. NFU Scotland believes larger-scale trials across different breeds and production systems are necessary before these methods could be considered viable replacements.

Competence and Practicality

NFU Scotland supports procedures being carried out by competent stockkeepers but emphasises that competence is often developed through practical on-farm experience rather than formal training courses. Producers should also retain flexibility to carry out procedures when lambs are strong enough, rather than being restricted by arbitrary time limits such as a 24-hour rule.

Economic Considerations

The organisation strongly disputes the cost assumptions in the consultation impact assessment. Proposed changes could significantly increase labour and production costs in a sector that already operates on tight margins. Any regulatory changes must be supported by government investment in research, product licensing, and transition support, and must also ensure equivalent welfare standards for imported lamb.

General Comments

Both tail docking and castration are necessary for sheep production in Scottish systems.

Extensive farming systems, slow growing breeds and natural grass-based finishing systems means most Scottish sheep are not slaughtered until after sexual maturity. Castration is therefore a necessity to prevent unwanted pregnancies in immature animals and the welfare issues associated with such young animals giving birth, often out of season and unexpectedly. It risks animals going to slaughter whilst unknowingly pregnant and results in inbreeding.

The extensive nature of Scotland's farms means separating sexes and the necessary fencing to achieve this is completely impractical in most cases. There are very limited markets for uncastrated male sheep, either as stores or finished animals. Store buyers are unable to separate sexes and processors do not want uncastrated males because of the risk of taint in the meat. NFUS would be keen to understand what discussions government has had with processors, and their responses to the consultation, to understand the difficulties they face with selling and processing uncastrated male sheep.

Scotland's natural and often extensive sheep production systems, combined with the usually wet conditions also makes tail docking a necessary process. Undocked tails can become excessively dirty, and increase the risk of parasitic infections, such as fly strike, which causes very serious welfare issues for the sheep. Members cited concerns around the reliance on chemicals to help tackle/prevent infections if tail docking is not permitted and the increasing problems of resistance seen in the limited products available. There were some who also cited improved fertility and tupping as a benefit from tail docking.

Excessively dirty sheep pose a food safety risk at processing and markets and processors both prefer docked tails because of the generally cleaner condition of the sheep, reducing food safety concerns and risk of parasitic damage to the most valuable cut of the carcass.

Until these issues are overcome, castration and tail docking remain essential to the majority of the Scottish sheep sector and the rural communities they support. When we surveyed our membership 96% of sheep producers said castration was essential for their business and 87% reported tail docking to be essential.

Animal welfare is important to Scotland's livestock keepers and whilst most producers accept there is some pain associated with tail docking and castration using existing methods, they see it as a necessary, short lived, pain to prevent the potential for far greater suffering in the longer term. Any potential alternative methods must be practical, affordable and effective, without risk of creating alternative welfare or health issues. However, we do not believe that any such alternative methods are currently available, and we feel that this consultation has 'jumped the gun' in consulting on proposals that rely on alternatives that are not yet available.

Bringing forth proposals with a short deadline to encourage a market and 'hope' that commercial companies will see an opportunity is frankly unacceptable, gambling with the livelihoods of sheep producers, food security and rural communities. It runs the risk of no products being available, or rushed development of products that risk unintended consequences for the sheep they are intended to protect. It also creates a situation where commercial companies are able to take advantage of the situation, with industry over a barrel, and over charge for products in a new market with limited competition.

Government should be creating an environment where they encourage and support companies to develop products and properly trial them to rule out any potential risks and ensure they are appropriate for Scotland's sheep systems before they make proposals requiring industry to adopt them. In that period, they must offer financial incentives for industry to take up and trial these alternatives helping to understand how well they work in practice. Until there are suitable products available producers must be able to continue using existing methods, with incentives to help trial and develop alternatives if appropriate.

Scotland's sheep businesses are often marginal enterprises delivering more in terms of environmental and rural community benefit to Scotland than financial reward to the producers themselves. Any alternative must be cost effective and cannot not impose significant cost to the business. Secondly, it must be practical for use in the field, bearing in mind most businesses will be single handed working with considerable time pressures at that time of year. It must be able to be administered single handedly, within a reasonable time and under often challenging conditions. Finally, it must also not have unintended consequences for welfare such as increased risks of infection, overdose, adverse reaction, rubbing or other injury.

Our members had mixed views on the proposal that lambs should not be tail docked or castrated within 24 hours of birth. Whilst nearly all supported the principle behind the proposal, that lambs need to be up, suckling and bonded before being tail docked or castrated, many thought the 24 hours was too prescriptive.

In indoor lambing systems ewes and lambs are held indoors following birth only until they are strong enough to be moved outside. It is important that they are moved outside as early as possible to reduce the pathogen load, in most cases this will be within 24 hours, but only as long the lamb is strong enough, suckled and bonded. In these circumstances lambs are tail docked and/or castrated before they are released and this should remain an option because once they are out it will not be possible to catch the lambs to carry out the procedure.

For outdoor systems there is a similar limited window, waiting until after 24 hours would make it impossible to catch the lamb to carry out the procedures. It may also be impossible to accurately judge the age of lamb making it impossible to enforce.

Overall, it was felt that it is important the lamb is strong, bonded and suckled but it should be left to the judgement of the stockperson to determine that point rather than an arbitrary time cut off. The following is a quote from one of our members that sums up our position.

'In an intensive indoor lambing this would mean keeping ewes and lambs in mothering up pens for an extra 12-24 hours. This would massively increase the pathogen load and could cause much more watery mouth and joint ill. In most cases bonding and the first good intake of colostrum has occurred successfully within the 2 hours after birth. Most shepherds intuitively know when to delay castration/docking to ensure this has occurred. 24 hours seems an arbitrary and over prescriptive time frame, I can see where the idea is coming from but in many cases, it could cause the opposite of what it is trying to achieve.'

Given the proposal also proposes that only 'trained and competent stockpersons' should be allowed to perform tail docking and castration, we feel this could be best covered by guidance which those carrying out the procedures should be familiar with.

We support the principle of stockpersons carrying out tail docking a castration needing to be trained and competent, although members were concerned about what form any such 'training' might take. Members agreed that legislative language should prioritise 'competence' over formal 'training,' recognising that practical skills are often acquired through peer-to-peer learning and experience rather than formal courses and certification. The role of veterinary oversight in demonstrating competence was also discussed as a possible option, preferred over training courses. The cost and availability of training courses and certification have been an issue in the past and it is important that any 'training' is affordable, flexible, available and local. Members feel peer to peer training in real situations is more accessible, practical and effective than prescriptive courses.

The proposals would mean a significant increase in cost of production for an already marginal sector. The proposals are simply impossible without significant support for the sector from government, retailers and consumers. Without support from either the market or government these proposals threaten to seriously undermine the sustainability of Scotland's sheep sector. Lamb is a crucial output of Scottish agriculture, utilising land usually unsuitable for any other form of production, keeping farming and communities in some of Scotland's most sensitive rural communities.

We believe changes need to be market driven but with current policies and consumer priorities all focusing on the need for affordable food this seems unlikely. Lamb is already a relative expensive meat, and we have very real concerns that any efforts to recoup the increased costs of production from consumers will simply result in processors and retailers sucking in cheaper imports, produced to lower standards, with lower costs of production, simply exporting the welfare problem whilst undermining food security.

Any decision to proceed with these proposals must come with guarantees to introduce and enforce equivalent standards for all imports and support for the sector to help balance the increased costs of production. We currently import significant quantities of lamb from New Zealand and Australia where rubber rings are widely used without anaesthetic or analgesia, we should not be permitting imports of products using methods of production that would be illegal in the UK.

Consultation Question responses

Methods of castration and tail docking

Question 8a. Surgical castration of lambs should only be permitted when carried out by a veterinary surgeon with an effective anaesthetic and analgesic.

1. Agree.

Question 8b. Please explain your answer

2. This is the current situation in Scotland therefore producers are familiar with the rules and do not see it as causing any problems, if there are practical and proportionate options available for producers to use.

Question 9a. Surgical tail docking of lambs should only be permitted when carried out by a veterinary surgeon with an effective anaesthetic and analgesic.

3. Agree.

Question 9b. Please explain your answer.

4. This is the current situation in Scotland therefore producers are familiar with the rules and do not see it as causing any problems, if there are practical and proportionate options available for producers to use.

Question 10a. Rubber ring castration of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic.

5. Disagree.

Question 10b. Please explain your answer.

6. NFU Scotland's position is it's crucial to retain the use of rubber rings for castrating lambs from 0-7 days old without the need for anaesthetic or analgesic.
7. Rubber ring castration/tail docking is the most widely used method in Scotland. It is proven to be highly effective and affordable. It is a simple, effective procedure that works consistently, and is easily carried out single handed even in adverse conditions with low risk of error.
8. Rubber rings are a low-cost method, and there are no issues with availability. With castration and tail docking, timing is important and the use of rubber rings ensure the procedure is done very quickly, reducing stress for the ewe and lamb.
9. Our members see rubber rings as a vital tool and have very serious concerns about the negative impact of the requirement to use anaesthetic and analgesic with rings on lambs 7 days and under. Not only are there no suitable products properly tested and licensed for the use on young sheep, the tiny dose rates are difficult to manage and injection sites leave animals vulnerable to damaging infections.

Lack of pain relief

10. The lack of suitable licenced pain relief products is a concern. The Medicine Cascade would be required to use these products. However, the cascade system is not designed for routine use, it is intended to meet the immediate health and welfare needs of specific animal or group, and relying on the cascade system puts all the responsibility on the prescribing vet which is not acceptable.
11. There are no authorised analgesics for sheep. This poses a significant risk of inaccurate dosing due to using the product under cascade and having to adapt dose rates to suit. Therefore, the proposals to require the use of pain relief are unacceptable without further investment.
12. There are concerns around the adverse effects of using pain relief on young lambs, An example is in the Defra funded study where a proportion of lambs experienced Acute Respiratory Distress Syndrome (ARDS) as a result of receiving Flunixin. This is a serious issue, and the welfare risks with the use of these products have not been taken into account by Defra.
13. Another example is a from the experience of a member on-farm. The member, who under veterinary supervision and guidance, used Meloxicam when they castrated and tail docked their lambs at between 6-8 weeks old, the Meloxicam was prescribed under the cascade system. Firstly, it was extremely difficult to do due to the tiny doses needed but more importantly within hours of the pain relief being administered, multiple lambs died. They filed an adverse reaction with the VMD, but the manufacturer effectively washed their hands of the incident and were uninterested in looking into the matter because it was 'off label' use. The producer reported they have never had dead lambs from using rings without pain relief and the vet has sworn never to recommend the use of the product in this way again. This is a wholly unacceptable situation and highlights why we cannot have legislation requiring producers to use products that are not appropriate and fully licenced for the purposed directed. Products must be fully tested and safe for use on young lambs, with an achievable and appropriate dose rate that does not run risks of overdosing especially when likely to be being administered in less than perfect conditions.
14. There are no authorised analgesic products for sheep and young lambs. Legislation cannot force producers to use products that are not licensed for use. Routine off-label use of the product under the cascade should not be encouraged let alone legislated, putting stockkeepers, vets and animals at a high level of risk.
15. Young lambs vary in weight, and as mentioned previously the small dosages required pose a huge risk of overdosing resulting in death. There are minimal information and recommendations for dosage in young lambs in scientific literature and not sufficiently validated to form the basis for change of legislation. Due to the high level of risk with overdosing and adverse reactions, the proposals are unacceptable.

16. Current anaesthetic and analgesic products rely on injection subcutaneously as the route of administration. This may be acceptable under clinical conditions; however, on-farm conditions mean anything that breaks the skin increases the risk of introducing infection. Rubber rings are favoured by producers partly because of their clean application, they do not break the skin or cause an open wound.
17. In Scotland there are a mix of lambing systems, both indoor and outdoor, depending on the farm type, geography, and breed of sheep. Throughout the lambing season, weather can be interchangeable, with adverse conditions seriously impacting how the system is managed. Accurately managing injections in the correct quantity in the correct site is challenging in these conditions and carries significant risk of infection in comparison to clinical conditions. Therefore, having to inject with pain relief before applying the ring would significantly increase the risk of infections such as joint ill or clostridial diseases, which can have a long-term impact on the lamb's quality of life, and in the worst-case scenario result in death. To treat diseases like joint ill, antibiotics would need to be used, increasing antibiotic usage which industry has worked hard to reduce. The additional cost of single use needles, syringes, authorised disposal also needs to be considered.
18. Our members are interested in the potential for using Lidocaine impregnated rubber rings, or similar types of products that offer a simple application of analgesic without risks of overdosing or infection. However, there are multiple issues that need addressed within this method, including cost as they are currently approximately 50 times the cost of a rubber ring. Lidocaine isn't licensed in the UK and cannot be used in food producing animals in the UK. There is a lack of validated information on its use in young lambs, and there is a risk of lidocaine transfer on human skin meaning the operator should wear gloves or wash their hands immediately after. However, members saw this as a method with potential and we would therefore ask that Government looks more closely at these as an alternative and invests and support development and licensing of these as an option.

Why we castrate

19. Both tail docking and castration are necessary for sheep production in Scottish systems. When we surveyed our membership 96% of sheep producers said castration was essential for their business and 87% reported tail docking to be essential.
20. Extensive farming systems, slow growing breeds and natural grass-based finishing systems means most Scottish sheep are not slaughtered until after sexual maturity. Castration is therefore a necessity to prevent unwanted pregnancies in immature animals and the welfare issues associated with such young animals giving birth, often out of season and unexpectedly. It risks animals going to slaughter whilst unknowingly pregnant and results in inbreeding.

21. The extensive nature of Scotland's farms means separating sexes and the necessary fencing to achieve this is completely impractical in most cases. There are very limited markets for uncastrated male sheep, either as stores or finished animals. Store buyers are unable to separate sexes and processors do not want uncastrated males because of the risk of taint in the meat. NFUS would be keen to understand what discussions government has had with processors, and their responses to the consultation, to understand the difficulties they face with selling and processing uncastrated male sheep.
22. The nature of the current lamb market in Scotland and across the UK is consistent throughout the year, with some seasonal peaks. This is possible due to the castration of male lambs, therefore we are able to carry male and female lambs to sell into the new year (known as Old Season Lamb (OSL)). As mentioned previously, buyers are unable to manage uncastrated lambs within their management systems.
23. In Scotland, lambs can take longer to fatten due to the topography and rougher ground. Reports from the supply chain suggest uncastrated OSL lambs that are being carried over, have poorer eating quality, due to meat taint. There is a risk that if consumers are exposed to poorer eating quality of lamb, they will switch to eating another source of protein. This has a ripple effect across the supply chain, where Scotland will be required to take in more imports from places such as Australia and New Zealand, which we are already seeing a vast amount of due to the Free Trade Agreement with Australia and NZ.

Question 11a. Rubber ring tail docking of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic.

24. Disagree.

Question 11b. Please explain your answer.

25. NFU Scotland's position is it is crucial to retain the use of rubber rings for tail docking in lambs from 0-7 days old without the requirement of anaesthetic or analgesic.
26. Scotland's natural and often extensive sheep production systems, combined with the usually wet conditions also makes tail docking a necessary process. Undocked tails can become excessively dirty, and increase the risk of parasitic infections, such as fly strike, which causes very serious welfare issues for the sheep. Members cited concerns around the reliance on chemicals to help tackle/prevent infections if tail docking is not permitted and the increasing problems of resistance seen in the limited products available. There were some who also cited improved fertility and tupping as a benefit from tail docking.

27. Excessively dirty sheep pose a food safety risk at processing and markets and processors both prefer docked tails because of the generally cleaner condition of the sheep, reducing food safety concerns and risk of parasitic damage to the most valuable cut of the carcass.

Question 12. What actions are needed from government and relevant stakeholders to support industry in moving away from this method?

28. Industry needs Government to properly invest and support the development of effective alternatives that are practical, cost effective, work and do not introduce new risks. You cannot simply 'hope' manufacturers will see an opportunity and spend the substantial money required to get existing products licensed.
29. In terms of veterinary medicines for anaesthetic and analgesic, the existing products available are not ideally suited to young lambs. As an emergency option under cascade, they may be acceptable, but not for widespread 'routine' mandated use. Existing formulations/dose rates may need to be redeveloped to produce the necessary dossiers to get the products licensed, which is a further expense.
30. The same applies for alternative methods of castration. Methods should be fully tested and evaluated to ensure there are no unintended consequences from their use. They must be practical to be used in real life, on-farm situations, with minimal risk of poor application and resulting welfare issues. They must reflect the reality of current farming businesses, fit in with existing management practice and be able to be administered single handed. Realistically they must also be affordable.
31. Currently, we do not agree there is enough reliable, validated evidence that supports moving away from this method. The industry must be able to retain the use of rubber rings for tail docking and castration in lambs between 0-7 days, due to the various factors detailed above. If there were available, topical pain relief products or impregnated rubber rings (taking into account the issues in paragraph 18), these could be considered an alternative.
32. Changes to tail docking and castration practice represents a significant shift for the sector and producers will need support to make changes. Government must ensure that support is available across all devolved administrations to avoid market distortion and certain sectors being disadvantaged. Clips are considerably more expensive than rings and if, following further trials and development, clips were demonstrated to be a safe, effective and an affordable alternative to rings, financial support for applicators and clips would help industry make the change.
33. The margins in the sheep sector in Scotland are tight, and without support will be unlikely to be able to absorb the additional costs associated with more costly alternative methods or the additional costs of the necessary veterinary medicines.

34. NFU Scotland is firmly opposed to industry being mandated to use products that have not been fully tested and approved for the intended purpose.

Question 13a. Clamp castration of lambs up to 3 months should only be permitted with an effective analgesic.

35. Disagree.

Question 13b. Please explain your answer.

36. The clamp (known as Burdizzo) should be permitted without analgesic for lambs. The clamp works the same way as a clip, in that it crushes the nerve so there should be no pain. Members using the method, especially in younger lambs, report that they see very little evidence of pain and do not see the need for pain relief with this method.
37. The issues raised in previous questions about pain relief availability and application also apply to this question, in particular for lambs aged 0 to 7 days.

Question 14a. Combined method castration of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic.

38. Disagree.

Question 14b. Please explain your answer.

39. For the same reason as above, the clamp is designed to crush the nerve, preventing pain, so anaesthetic and analgesic should be unnecessary.
40. The issues raised in previous questions about pain relief availability and application also apply to this question, in particular for lambs aged 0-7 days.

Question 15a. Combined method tail docking of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic.

41. Disagree.

Question 15b. Please explain your answer.

42. For the same reason as above, the clamp is designed to crush the nerve, preventing pain, so anaesthetic and analgesic should be unnecessary.
43. The issues raised in previous questions about pain relief availability and application also apply to this question, in particular for lambs aged 0-7 days.

Question 16a. Clip castration of lambs up to 3 months should be permitted without an effective anaesthetic or analgesic.

44. Not sure.

Question 16b. Please explain your answer.

45. This proposal requires further testing and refinement of clip systems, to determine if they are truly an appropriate alternative without risks from welfare issues across the board.
46. For clarity, we agree with the principle of not requiring pain relief for clip castration up to 3 months, however we have concerns with the way in which the clip method results in other welfare issues.
47. Our members have mixed experience using the clip system, some have found it straightforward and effective. There is an acknowledgement the allowance of this method up to 3 months could assist management challenges with flocks in extensive systems. However, equally some have experienced significant problems.
48. Significant welfare issues with the clips have been reported by members, including chafing from the clips between the legs, resulting in the skin breaking. There have also been issues with the sizes of clips for the age of the lamb, where the clips are too big for the size of the lamb. Application wise it is also too fiddly to apply the clips to small lambs.
49. NFU Scotland are concerned that there hasn't been a sufficient number of lambs trialled with this method to confidently conclude it is a safe alternative. In the Defra study, outcomes were measured in only 16 castrated lambs. Although there have been small scale trials in Scotland and wider use, we firmly believe there needs to be large scale official trials looking at different breeds and situations to fully evaluate and refine the method to ensure there are no unintended consequences and welfare risks associated with use of the method.
50. In the SRUC final report, there was concerns referenced where it was found it was impossible to ensure both testes were distal to the clamp in 50% of castrations using clips in young lambs, whereas this wasn't an issue in heavier/older lambs. As a result, the young lambs were short scrotum castrated.
51. Livestock Health Scotland have recently undertaken work that looks at using short scrotum castration to overcome some of the issues with small lambs using the clip method. Although short scrotum castration was considerably easier to perform, subsequent testing suggested that it did not effectively render the lambs infertile meaning it could not be relied upon for castration. The limitations of the clips in young lambs is another valid reason for continuing to allow rubber rings to be used on lambs 0-7 days old without the use of pain relief.

52. A common complaint was the time taken to apply the clips, with members reporting that it took a significant amount of time to apply (compared to the conventional rubber ring method) and required at least two people to perform effectively making it impractical for most farms, especially in the current labour shortage. Others explained that clips could not be applied when using existing sheep handling equipment, with chutes and handling facilities requiring replacement or expensive modification to facilitate the process smoothly.
53. Other issues reported include the clips falling off, and the concern of a significant amount of plastic being left in fields that would consequentially be used to grow silage, which could become a welfare issue when feeding that silage to livestock. Although there are now biodegradable clips available, concerns have been raised that this makes them more brittle and potentially easier to break / fall off too quickly.
54. NFU Scotland also have concerns on the ability for this method to be effectively scaled up to enable industry to use it widely. This is a relatively novel technique and product, meaning it's not well-established and therefore it's a very small market. There is a lack of companies the clips can be sourced from, therefore there is a monopoly in the market which can put producers at a disadvantage. All the above valid issues need to be addressed, especially those relating to animal welfare concerns, before the clip system can be more widely adopted or imposed on producers.

Question 17a. Clip tail docking of lambs up to 3 months should be permitted without an effective anaesthetic or analgesic.

55. Not sure.

Question 17b. Please explain your answer.

56. There have been significant problems found when using the clip method to tail dock, which are very concerning, such as tails coming off and leaving open wounds, which could result in flystrike. If there is an open wound, the lamb will have to be treated with medication which again comes back to the argument there is a limited number of available products and could result in an increase of antibiotic usage. There is a significant lack of credible evidence to prove this alternative method is safe, reliable and will not have a detrimental impact on the lamb's welfare.
57. There is a need for further testing and refinement of clip systems, before it can be demonstrated they are truly a better alternative without risks from welfare issues across the board.
58. Members have never reported finding any issues with using rubber rings for tail docking, this is a well-established method that doesn't leave open wounds.

Question 18a. Hot iron docking of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic.

59. Not sure.

Question 18b. Please explain your answer.

60. We broadly agree, and the 'not sure' answer reflects a mix of views on this method. Similarly to previous answers, we have concerns on administering pain relief in young lambs. Anaesthetic and analgesic may be required in lambs over 7 days old for this method.
61. The issues raised in previous questions about pain relief availability and application also apply to this question, in particular for lambs aged 0-7 days.

Stockkeeper training

Question 19a. Castration and tail docking of lambs should only be performed by a trained and competent stockkeeper.

62. Agree. Castration should only be carried out by competent stock persons.

Question 19b. Please explain your answer.

63. We support the principle of stockpersons carrying out tail docking and castration needing to be appropriately trained and competent, although our members were concerned about what form any such 'training' might take. Members agreed that legislative language should prioritise 'competence' over formal 'training,' recognising that practical skills are often acquired through peer-to-peer learning and experience rather than formal courses and certification.
64. The role of veterinary oversight in demonstrating competence was discussed as a possible option, preferred over training courses.
65. The cost and availability of training courses and certification are common issues. It is important that any 'training' is affordable, flexible, available and local. Members feel peer to peer training in real situations is more accessible, practical and effective than prescriptive courses.
66. As referenced, the competent stockkeeper should be 18 years old, however if they are aged 16-18, they should be under supervision of a competent stockkeeper 18 years or older.

Question 20. What makes a stockkeeper trained and competent?

67. On-farm training is the preferred option. In general, stockkeepers find the most effective learning to be real life situations on farm, which provides the most favourable learning environment. It allows stockpersons to learn the optimal methods within their system that suit the age and size of the animals, and available equipment within their management system. Access to appropriate guidance and information on methods and techniques is also important.

Question 21a. Castration of lambs should only be permitted after the first 24 hours of life.

68. Disagree.

Question 21b. Please explain your answer.

69. The competent stockkeeper will know when it is safe and appropriate to castrate lambs. The decision will be made when the lamb is robust enough, regardless of when it was born. The lamb will have suckled the ewe, will be mostly or completely dry and an established the mother-lamb bond. The stockkeeper will not perform the procedure if the lamb is not strong enough. Lambs require colostrum in the first few hours (not 24 hours) of life to remain viable, therefore castration can take place within the first 6 hours of birth in some cases. This proposal will also be extremely difficult to enforce. Setting an arbitrary time frame could have unintended consequences, such as getting lambs out to clean pasture. Also, after 24 hours, in an outdoor system, the individual lamb will be harder to catch, requiring group gathering which poses its own risks such as injury, stress and mismothering – which will have much longer-term impacts.
70. Overall, it was felt that it is important the lamb is strong, bonded and suckled but it should be left to the judgement of the stockperson to determine that point rather than an arbitrary time cut off. The following is a quote from one of our members that sums up our position.
71. *'In an intensive indoor lambing this would mean keeping ewes and lambs in mothering up pens for an extra 12-24 hours. This would massively increase the pathogen load and could cause much more watery mouth and joint ill. In most cases bonding and the first good intake of colostrum has occurred successfully within the 2 hours after birth. Most shepherds intuitively know when to delay castration/docking to ensure this has occurred. 24 hours seems an arbitrary and over prescriptive time frame, I can see where the idea is coming from but in many cases, it could cause the opposite of what it is trying to achieve.'*

Question 22a. Tail docking of lambs should only be permitted after the first 24 hours of life.

72. Disagree

Question 22b. Please explain your answer.

73. See response to 21b.

Question 23a. Castration of lambs over 3 months should only be permitted when carried out by a veterinary surgeon with an effective anaesthetic and analgesic.

74. Agree.

Question 23b. Please explain your answer.

75. As this is currently already the situation in Scotland and does not cause difficulties for the sector we accept it.

76. The limitations around availability and administration of anaesthetic and analgesic still apply.

Question 24a. Tail docking of lambs over 3 months should only be permitted when carried out by a veterinary surgeon with an effective anaesthetic and analgesic.

77. Agree.

Question 24b. Please explain your answer.

78. See answer to 23b.

Question 25a. Do you agree with the estimates and assumptions presented in the consultation-stage de minimis assessment (e.g., time, cost, uptake of new methods, feasibility of pain relief use)?

79. No.

Question 25b. If you answered “No”, please explain your reasoning. Where possible, provide alternative estimates or examples from your experience (e.g., costs, procedure times, uptake of new methods).

80. NFU Scotland found the impact assessment document extremely convoluted.

81. We cannot accept the financial ‘benefit’ put forward, we do not believe a cost can be put on the welfare benefit, beyond what a consumer would be willing to pay. It is widely known that in these particular surveys, like the 2025 University of Reading study, that what consumers say they are willing to pay is very different to what they would spend their actual money on. For this reason, the study findings should not be used to justify legislative changes. This makes the benefit entirely fictitious and correctly highlights that all the, not insignificant, costs will fall on the producers having to utilise these higher cost, higher labour methods.

82. Proposed annual costs to industry of £6.5 million/year are simply not affordable to the sector. The assessment describes the increases as ‘small increases in production costs’, but in reality, the proposed changes would significantly increase costs at a farm level, that won’t be able to be absorbed. Attempts to balance that off against possible indirect gains to the UK from multinational pharmacological companies or tech companies managing to increase their sales is frankly insulting.

83. It is extremely difficult to put a cost on the increased labour that may be required for these proposals. Each process will take considerably longer, 6-10 times longer and may also require an extra person, something the assessment does not appear to take account of. Many sheep enterprises are run single handed, with some seasonal labour. It may not be possible or affordable to employ an extra person just for helping with the specific task of tail docking and castration. As previously mentioned, rubber rings are a simple, effective method that doesn’t require additional labour.

84. The assessment mentions export opportunities, but realistically we are not aware that these proposals will do anything to open up new markets. We do however have serious concerns around the impact of imports produced to a lower welfare standard. The sector already struggles with cheap imported lamb filling the shelves at cheaper prices and struggles to compete with higher costs of production. These proposals will bring increases to cost of production in an industry that is already struggling to compete. Unless the proposals include restrictions on imported lamb products unless they are produced to the same welfare standards, we will only serve to export the welfare problem and undermine UK production.
85. We strongly believe equivalence for imports is an absolute before any changes to the current rules can be proposed.
86. The assessment omits the impact of the proposals on processors. As mentioned in the justification to tail dock and castrate, a direct impact of not tail docking and castration is unwanted pregnancies. If there is an increase in unwanted pregnancies, processors will need to humanely dispatch and dispose of the newly born lambs. This will have an obvious emotional impact on the processing staff, and it will also add significant costs to the business as a whole. Uncastrated males in abattoirs will also result in additional animal by-products (testicles and tails) which will need to be disposed of. Ultimately any additional cost on a processor will directly impact the price the producer receives.
87. Tail docking ensures the carcass is as clean as possible when it goes to slaughter. The result of not tail docking can be dirty sheep with risk of faecal contamination during processing. The knock-on impact is it could result in excessive trimming of carcasses or the risk of the product being found non-compliant and unable to go through border control.
88. The assessment doesn't consider the health risks of the proposed methods, specifically in an increase in administering pain relief. As previously mentioned, additional injections and breaking of the skin could lead to an increase in Joint-III and clostridial diseases resulting in increased mortality and increase antibiotic usage.
89. The assessment doesn't consider the practical management implications of their proposed methods. For example, to use both anaesthetic and analgesic, the lamb would have to be caught, injected, released, and then caught again for the application of rubber rings with analgesic. There are various practical implications for this, including increased stress to the animals, mismothering as well as a huge increase in the time taken to tail dock and castrate.

Further comments

Question 33. Please provide any comments or evidence on the environmental impacts the proposed policy may have.

90. The proposals would potentially mean an increase in the need for anti-parasiticides and treatment for flystrike.

Question 34. Please provide any comments or evidence on the equality impacts the proposed policy may have.

91. There is no evidence of equality issues, however there are a significant number of small producers and crofters in Scotland and the increase in costs through alternative methods could disproportionately impact those businesses.

Question 35. Please provide any comments or evidence you feel should be considered concerning the socio-economic impact the proposed policy may have on both producers and consumers. Please explain your answer.

92. In Scotland, there are a vast number of upland hill sheep units, with 85% of agricultural land classed as Less Favoured Areas (LFA). Producers in less favoured areas provide a wealth of socio-economic benefits, underpinning rural economies and rural communities. These proposals could threaten the viability of upland hill sheep units and therefore undermine the benefits these businesses provide to rural Scotland.

Question 36. Please provide any comments or evidence you feel should be considered concerning the socio-economic impact the proposed policy may have on both producers and consumers. Please explain your answer.

93. NFU Scotland has concerns over the accessibility and design of this consultation, particularly when producers are expected to respond. The Citizen Space consultation starts with pages of screeds of information, before reaching 36 questions to answer. We would argue this has been a barrier to stockkeepers responding to this consultation, it is clunky and large, especially when stockkeepers are time poor.

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