

REGULATORY APPRAISAL

ANIMALS, WALES

ANIMAL HEALTH

THE TSE (WALES) (AMENDMENT) (NO.2) REGULATIONS 2005

Purpose and intended effect of the measure

1. These Regulations will provide the necessary legal powers in Wales to enforce a robust testing regime for the testing of Over Thirty Months (OTM) cattle for human consumption. They will also make it an offence to consign cattle born before 1 August 1996 to an abattoir for slaughter for human consumption, and make a number of relatively minor amendments to the TSE Regulations required to address issues that have arisen in the areas of enforcement, identification and feed controls.
2. Separate, but parallel, legislation will be needed in England, Scotland and Northern Ireland.

Background

3. In the light of the decline in BSE cases the Food Standards Agency (FSA) launched a review of the OTM rule in July 2002. In July 2003, following a scientific risk assessment, analysis of the risk assessment, and a public consultation, the Food Standards Agency (FSA) advised Ministers in the Department for Environment, Food and Rural Affairs (Defra), Scotland and Wales that it would be justified to make moves towards replacing the OTM rule. The advice also stated that Ministers should not change the OTM rule until they were satisfied that the necessary arrangements (which would include arrangements for BSE testing) had been made.
4. On 1 December 2004 following further advice from the FSA, the UK Government announced the start of a managed transition towards the lifting of the OTM rule and its replacement with a system of robust testing of cattle for BSE. The timing of any changeover is dependent on the FSA advising and Ministers agreeing that the testing regime is robust and on a number of other issues, such as recruitment of additional Meat and Hygiene Service (MHS) staff.
5. An Independent Advisory Group (IAG) was set up by the FSA to advise on what arrangements would be required ahead of any change to the OTM rule. The IAG's initial work identified the key components of a robust testing system and these were subsequently endorsed by the FSA Board on 9 December 2004. The need for some flexibility, on the components relating to abattoirs, was acknowledged by the IAG to allow for differing facilities and processes at individual plants.

A: Required Methods of Operation (RMOP)

6. In order to assure that the testing of OTM cattle for human consumption is robust, the IAG concluded that a written agreement referred to as a Required Methods of Operation (RMOP) should be drawn-up between the Meat Hygiene Service (MHS) and individual abattoir owners, which reflected the requirements of the key components and their practical implementation. The IAG further recommended that the key components and the need for a mutually agreed RMOP should be set out clearly in legislation.

B: Pre-August 1996 cattle

7. There have been some recent failures to comply with the Over Thirty Month (OTM) rule, which prevents meat from OTM bovines being sold for human consumption. These have occurred following mistakes made by farmers, abattoirs and the Meat Hygiene Service. Whilst the requirements, as regards OTM bovine animals, on abattoirs and the MHS have been set out in legislation, they have not, historically, been set out for farmers.
8. Following a change to the OTM rule, bovine animals born or reared in the UK pre-August 1996 will continue to be excluded from the food chain. The Food Standards Agency in May 2005 recommended that in order to strengthen enforcement of this exclusion, in addition to prohibiting abattoirs from processing such animals, it should be made an offence for anyone to consign cattle aged over thirty months to a slaughterhouse for human consumption. This S.I. incorporates this recommended change.

C: Other measures

9. The 2004 EU Food and Veterinary Office (FVO) mission inspection visit on BSE highlighted areas requiring improvement in the UK enforcement of the European TSE legislation. It was recommended in the FVO report summarising the mission, that further controls were needed in the area of animal feed, primarily relating to the UK's implementation of the controls on fishmeal, which is banned from ruminant feed – notably to bring our current registration of feed manufacturers using fishmeal into line with the terms used in the EU legislation. EU legislation requires *authorisation* in these circumstances, and at farms using feed containing fishmeal where ruminants are present, official permission to do so needs to be granted after inspection of separation – the SI requires registration as a means of targeting necessary inspections.
10. The FVO also recommended that there should be compliance with the inspection Directive 95/53. This requires that information on the analysis of feed samples submitted by feed producers to laboratories, must be notified to the competent authority where the results indicate a breach of the ban. There is a specific provision for this in the draft legislation to back up existing administrative action and guidance, which has already been issued, to those submitting private samples.
11. The proposed S.I. also makes a number of relatively minor changes needed in the domestic regulations to reflect changes made to Regulation (EC) 999/2001 and to clarify enforcement measures.

Definition of “the Community Transitional Measures” in regulation 3

12. Regulation (EC) 932/2005, which extends the application of the transitional measures, including Specified Risk Material (SRM) controls, has been added to the list of amendments in the definition of Regulation (EC) 999/2001 (“the Community Transitional Measures”). This ensures that these measures continue to have legal force in domestic legislation.

Definition of ‘inspector’

13. Under the current testing regime, all parts of the carcass of a tested animal, including the hide, should be traceable and should remain under official control. Standard practice is that hides are generally sent to hide premises for treatment to prevent loss of value of the hide. This amendment would re-define ‘inspector’ to include a person appointed by the Meat and Livestock Commission (MLC), who will be responsible for official controls at these premises.

Definition of ‘local authority’

14. Parts of the present Regulations rely on local authorities for enforcement. This amendment adds district councils in non-metropolitan counties to the definition of local authority.

Definition of ‘vertebral column’

15. European requirements for the monitoring and control of TSEs are set out in Regulation (EC) 999/2001. The Welsh Regulations reflected these requirements and set out the monitoring and control regimes for TSEs in Wales. The definition of ‘vertebral column’ in the European TSE regulations has been amended and modified since the initial publication of the European Regulations. This amendment would reflect these changes.

Addition of ‘Young Goat Stamp’

16. Under the current regulatory system, a sheep or goat under the age of twelve months, (which is usually established by a permanent incisor tooth not having erupted), is marked with a ‘Young Lamb stamp’. This has led to difficulties distinguishing between young lamb and young goat carcasses. To address this concern, the FSA have proposed the introduction of a ‘Young Goat stamp’ to aid identification. Regulations 38, 41 (1) and (2), 46 (1) and 47 (1) also need to be amended to reflect the use of the new stamp.

Powers of slaughter under feed controls

17. At present an ambiguity exists in the present legislation about when an inspector is authorised to destroy an animal suspected of having been fed prohibited feed. The proposed amendment makes clear that, where a notice to destroy an animal has been issued and the recipient of the notice appeals against it, an inspector cannot take action to destroy the animal unless the notice has been confirmed.

Removal of Specified Risk Material (SRM) under regulation 33 (1) & 33 (10)

18. The current legislation allows only Beef Assured Scheme (BAS) animals (the only GB produced OTM animals currently allowed into the food chain) to be consigned to a cutting plant for removal of vertebral column. The current regulation is being altered to enable all bovine carcass meat containing vertebral column which is

SRM to be consigned to a cutting plant licensed for removal of SRM bovine vertebral column, to reflect the European requirements and allow the processing of OTM meat to take place.

Removal of SRM in sheep and goats under regulation 33 (2)

19. Concerns on the removal of SRM in sheep and goats in the domestic legislation. The present requirement for animals with one or more permanent incisor teeth erupted is that the head, spleen and tonsils are removed in the slaughterhouse, reflecting the SRM definition at the time the original Regulation was made. This no longer aligns with the definition of SRM in the European legislation and the present regulation should be amended to reflect the European requirements. As the definition of SRM is set out in the directly applicable EU Regulation there is no need to repeat it here, with the exception of the item that is excluded i.e. spinal cord.

Removal of SRM spinal cord under regulation 37

20. Current regulation 37 of the domestic TSE legislation makes reference to bovine animals. However, this regulation deals specifically with the removal of SRM spinal cord from sheep and goats. It should therefore be amended to remove references to bovine animals.

Offences (under Schedule 6A)

21. In response to Regulation (EC) 1492/2004, which amended the European TSE Regulations to make breeding programmes compulsory following the confirmation of scrapie in sheep, an amendment was made to the domestic regulations, which transposed these requirements. The schedule in these Regulations creates such offences but there is no statement in the schedule as to the sanctions for such an offence. (Regulation 99 does not apply by reason of paragraph (1) of that regulation. A further Part is therefore required in the Schedule to set out the sanctions to apply if an offence is committed under the Schedule).

Risk assessment

22. Failure to set in place the necessary legislative framework for a testing regime for OTM animals may delay the decision to replace the OTM rule. The Exchequer costs of purchase and destruction of OTM cattle under the OTM rule currently amount to some £320m a year. A delay on the OTM decision would prolong this expense. A delay to the lifting of the OTM rule would also set back the process of removing the beef export ban.

23. The impact of the proposals for a robust testing system is limited to firms that voluntarily make the decision to participate in the OTM trade. Plants are being trained to take samples free of charge, and Defra are proposing to pay for laboratory costs and for Meat Hygiene Service (MHS) supervision throughout GB. The costs to abattoirs of taking a sample, transporting that sample, and retaining and correlating carcasses and body parts to that sample, will be small compared with the value of the carcass.

24. Failure to address the points relating to the feed ban and the recommendations made by the Food and Veterinary Office (FVO), described above, could contribute

to the European Commission delaying bringing forward a proposal to lift the beef export ban.

25. Failure to establish an offence of consigning cattle born or reared in the UK before 1 August 1996 to an abattoir for slaughter for human consumption would lead to criticism by the FSA who have stated this is a pre-requisite for replacing the OTM rule with a BSE testing regime. It could also mean that the FSA would not be able to advise Ministers that the OTM Rule should be changed.
26. Not addressing the various issues in the domestic legislation, highlighted above, would: continue to leave district councils without enforcement powers; allow difficulties in identification to persist between young goat and lamb carcasses; leave the SRM provisions out of line with European guidance; and continue a gap in sanctions for offences.

Options

Option 1: Do Nothing

A: RMOP

27. Under the 'do nothing' option a legal basis for the Required Methods of Operations (RMOP) will not be established. This is a pre-requisite for lifting the OTM rule. Without a legal basis for the RMOP the testing regime for OTM cattle could not be adequately enforced and it is highly unlikely that the OTM rule would be replaced.

B: Pre-August 1996 cattle

28. Not creating an offence for farmers to send born before 1 August 1996 bovines to a slaughterhouse for human consumption could contribute to failures in the system of animal identification, potentially allowing some of these animals into the food chain. This would lead to serious criticism of the testing system and could damage confidence in the domestic beef market. The creation of this offence is also one of the pre-requisites for OTM rule change. Without it, it is highly unlikely that the OTM rule would be replaced.

C: Other measures

29. Failure to add Regulation (EC) 932/2005 could lead to issues arising in the enforcement of controls based on the transitional measures of the EU TSE legislation.
30. Failure to add a reference to the Meat and Livestock Commission (MLC) in the definition of inspector would mean that these officials would not be able to oversee the controls at hide premises. This could mean that hides may not be permitted to move from slaughterhouses whilst test results are awaited for OTM animals. Similarly, continuing to omit district councils from the definition of local authority in the domestic legislation would prevent them from taking action under the Regulations.
31. Not making the recommended change to the definition of 'vertebral column' would mean that the definition would not correlate with the European definition. Continuing not to address this issue in the domestic legislation could also lead to

problems in the future in trade with our EU partners. Linked to this issue, failure to amend the Regulations would mean it would not be possible to consign OTM carcasses to cutting plants for vertebral column removal. It would also mean that the regulations would not reflect present industry practice, as plant operators and the Meat Hygiene Service (MHS) are already working to the European definitions.

32. Not introducing a separate stamp to identify between young goat and young lamb carcasses would allow difficulties in distinguishing between young lamb and young goat carcasses to persist.
33. Failure to insert a section on offences into the Schedules would allow a potential gap in enforcement to continue.
34. Although the UK considers the ban on fishmeal in ruminant feed to be unjustified there has been no change in this respect to the European legislation. Not making adjustments to the feed ban relating to fish meal and its use could lead to the UK's implementation of the overall feed ban being seen by the EU Food and Veterinary Offices (FVO) as inadequate because of perceived shortcomings in this area. This in turn could lead to the rule change being delayed or postponed and could also have a negative impact on efforts to lift the beef export ban.

Option 2: Make the Legislation

A: Required Methods of Operation (RMOP)

35. Amending the domestic TSE legislation would give legal effect to the written agreement referred to as a Required Methods of Operation (RMOP) between a slaughterhouse and the MHS. This is a key requirement that the Independent Advisory Group (IAG) has highlighted as part of a robust testing system. Ensuring that the appropriate enforcement powers are in place would form an essential element to the replacement.

B: Pre-August 1996 cattle

36. Creating a new offence for consigning a pre-August 96 animal to a human consumption slaughterhouse would strengthen enforcement powers in this area and potentially reduce the likelihood of failures in the cattle identification system occurring.

C: Other measures

37. Making the amendments to the definitions in the TSE Regulations continues to give legal force to required controls under the European transitional measures; corrects omissions in the area of enforcement, allowing district councils to take action under the TSE Regulations and enables abattoirs to send hides to hide markets under Meat and Livestock Commission (MLC) control.
38. Changing the definition of vertebral column will bring it in line with European legislation and amending Regulations 36 and 37 corrects anomalies and updates the rules governing Specified Risk Material (SRM) removal in line with European legislation, reducing the risk of action against the UK by the Commission. Revisions will also allow the OTM carcasses to be consigned to cutting plants for

the removal of SRM vertebral column, subject to the plant having the appropriate licence.

39. The addition of the term 'Young Goat Stamp' and amendments to regulation 38, and related regulations 41, 46 and 47, allows the FSA to introduce the use of such a stamp, which would improve the means for identifying these carcasses.
40. Adding a section on offences to Schedule 6A corrects an oversight in the previous legislation.

Benefits

41. The economic, social and environmental benefits of this option are set out below on a UK basis. There are no specific Wales-only benefits.

A: Required Methods of Operation (RMOP)

42. By defining clearly the requirements that abattoirs must meet in order to participate in the OTM trade the regulation improves information in the market and will allow abattoirs to make a commercial decision to enter the trade with a greater degree of information.
43. A demonstrably robust testing system would have the benefit of increasing public confidence in OTM meat and would facilitate the growth of this market to pre-1996 levels. An increase in public confidence domestically would also serve to boost wider confidence in UK OTM meat in Europe and could hasten the lifting of the export ban.
44. The benefits above do not take into account the overall benefits of a decision to lift the OTM rule. The OTM rule cannot be replaced by testing unless Ministers agree that the testing system is robust, on the back of advice from the FSA, who will be advised by the IAG. Such a decision would result in significant savings in Exchequer, allow the market to determine the value of OTM animals, which is expected to lead to improved returns to producers and all parts of the meat industry and possibly benefit consumers via the availability of cheaper OTM beef for manufacturing. A full analysis of these benefits is available in the FSA's Regulatory Impact Assessment on the replacement of the OTM rule

B: Pre-August 1996 cattle

45. Introducing an offence of consigning animals born before 1 August 1996 to a slaughterhouse for human consumption places a clear responsibility on the farmer. This additional layer of protection helps ensure these higher risk animals do not enter the food chain, which represents a social benefit in terms of maintaining consumer confidence in the domestic beef market. This complements the responsibility already placed on abattoir operators.

C: Other measures

46. Adding Regulation (EC) 932/2005 to the list of amending regulations to the definition of "the Community transitional measures" has the benefit of removing any risk of challenge to the legal basis of controls based on the transitional measures of Regulation (EC) 999/2001.

47. Updating the definition of 'vertebral column' and the requirements of SRM removal has the political benefit of bringing domestic legislation back into line with European legislation thereby avoiding possible confusion and potential future barriers to trade.
48. Allowing OTM carcasses to be sent to appropriately licensed cutting plants for vertebral column to be removed will mean that rule change can take place without legal impediment.
49. The introduction of the Young Goat stamp benefits government, industry and consumers as it increases the ability to identify young lamb and young goat carcasses, preventing the substitution of lower value young goat carcasses for higher value young lamb carcasses and enabling inspectors to take action in cases where such substitution is attempted.

Costs

A: RMOP

50. There are no financial implications for the Assembly as a result of the making of these Regulations.
51. From when the TSE (Wales) Regulations 2002 came into effect on 27 May 2002, until 31 May 2004, sampling of bovine animals and transportation of such samples to the testing laboratory was paid for by the UK Government. There were no costs to the Welsh Assembly Government. Since 1 June 2004, sampling and the transportation of samples have been the responsibility of the abattoir operators. This is estimated to average out at £10 per animal tested. This change was required because of EU State Aid rules, limiting the amount of aid Member States can contribute toward BSE testing. Accordingly the Regulations have been updated to reflect this current practice and a new provision inserted to ensure that samples are taken in accordance with the procedures required by the European TSE legislation. Currently approximately two-thirds of abattoirs in GB that slaughter cattle have received training in the taking of brain-stem samples, which Defra offers free of charge to abattoirs. This provision, therefore, does not impose an additional cost burden on industry but formalises in legislation existing practice.
52. Linked to the above change, there is a new provision in these Regulations which restricts entitlement to compensation for carcasses that are destroyed when there is a failure to obtain a negative BSE test result (a "no-test" result) because, for example, an abattoir has failed to take an adequate brain stem sample or samples have failed to arrive at the testing laboratory. This is a change from the previous situation. However, its impact is expected to be limited. Based on figures from 2004, only 2 samples, out of a total of 2,263 samples taken from 24 – 30 month casualties (0.09%) received a 'no-test' result. This cost would be in the region of £4,800 per annum for industry until the Over Thirty Month rule is replaced by testing when much larger number of cattle eligible for the food chain will need to be tested.
53. Any other costs associated with BSE testing OTM cattle slaughtered for human consumption apart from the laboratory costs would fall to industry. Costs for a

typical business would depend on the facilities already available at individual premises and OTM cattle throughput. The actual unit cost to industry will be dependent on throughput, but Defra estimate that the cost, including taking samples, consumables, packaging and transportation of the sample but excluding test kit and the test itself to average around £10 per animal tested. These costs apply throughout the UK.

54. All animals which require testing under this amendment are currently tested through the Over Thirty Month Scheme (OTMS). Therefore cost to government for the analysis of samples will be unaffected by this S.I.. However, there are additional Meat Hygiene Service (MHS) / Meat and Livestock Commission (MLC) enforcement costs which would be paid by Defra.

B: Pre-August 1996 cattle

55. The regulation making it an offence to consign an animal born before 1 August 1996 would not incur additional costs for producers. These animals currently are not eligible for human consumption and after any change to the OTM rule should not be sent to a human consumption slaughterhouse. The new offence provides a legal basis to enforce this control and should not involve any change to producers' procedures.

C: Other measures

56. It is not expected that amending the TSE Regulations to address the various issues highlighted above, will generate additional costs. However, the Community TSE Regulations currently require that all bovine carcasses that do not require the vertebral column to be removed as Specified Risk Material (SRM), be identified by a blue stripe label applied in the slaughterhouse. This provision is not currently implemented in Wales, but will be so once OTM cattle can be slaughtered for human consumption. Although this provision does not necessarily require an additional label, as information on the labels currently in use can be applied to a blue stripe label, a small additional cost may be incurred by slaughterhouses.
57. The changes relating to feed manufacturers using fishmeal, from registration to authorisation, mainly reflect a regularisation of the terms used in domestic legislation with those used in EU legislation. Registration is already carried out against a background of inspection. Therefore this change is cost neutral to industry. Registration of farms using feed containing fishmeal where ruminants are present involves a notification by affected farmers to the competent authority. Of around the 2500 farms with both ruminants and non-ruminants present in Wales, it is estimated, on the basis of previous on-farm inspections, that around 10% may be using fishmeal in feed and need to register.

Equity and Fairness

58. There is no unequal impact by gender, age, disability, or by race. It is expected that a fairly even geographical spread of participating slaughterhouses and cutting plants will be involved. It is not expected that any impact on particular income groups will be significant.

Consultation

With small business: the Small Firms' Impact Test

59. Consumers and small business interests are represented on Defra's Stakeholder Group, which has been looking at preparations for the possible introduction of large scale BSE testing of OTM cattle slaughtered for human consumption. As at end January 2005, 165 slaughterhouses GB-wide (15 in Wales) had been trained to take brain stem samples, of which approximately 40 are low throughput (possibly 4 in Wales). Some or all of these may be interested in handling OTM cattle.
60. All red meat slaughterhouses and cutting plants regardless of size, throughput or intention to participate in the trade have received the consultation papers.

With Stakeholders

61. A public consultation was carried out with Stakeholders between 9 March and 1 June 2005 and, subsequently, between 2 August and 2 September 2005. A list of consultees is attached at Annex 1. Out of 83 stakeholders consulted in Wales, only 4 responses were received. There was a similar low response rate to the separate consultations carried out in the rest of the UK. There was general support for principles behind the proposed legislation, although some concern was expressed by the Farmer's Union of Wales on the enforcement of the EU requirement that cattle not requiring the vertebral column to be removed as specific risk material (SRM) are identified with a blue stripe label. No changes were made to the draft Instrument as a result of the consultation.
62. A Supplementary Letter to the consultation issued on 2 August 2005, seeking views on a number of relatively minor amendments; the inclusion of a limited number of provisions also contained in the proposed TSE (Wales) Regulations 2006, relating to the manufacture and use of feed containing fishmeal and analysis of feed samples; and a new offence of consigning bovines born before 1 August 1996 to a slaughterhouse for human consumption. This consultation ended on 2 September 2005, to which no responses were received.

With Subject Committee

63. These Regulations were notified to the Environment, Planning and Countryside Committee, via the list of forthcoming legislation on 13 April 2005 (EPC2-04-05 (p.3) item no. CFA 95). They were not identified for detailed scrutiny.

Enforcement and Sanctions

64. Legislation would be enforced at licensed slaughterhouses and cutting plants by the Meat Hygiene Service in Great Britain and by the Department of Agriculture and Rural Development in Northern Ireland. The Meat and Livestock Commission would enforce controls in hide markets. Sanctions would be applied for non-compliance.

Monitoring and Review

65. The functioning of the system for BSE testing of OTM cattle would be subject to continuous monitoring by the MHS and DARD as part of their enforcement function. The entire testing system, including MHS and DARD enforcement,

would also be subject to an independent review covering the first 6 months following implementation.

Summary and Recommendation

66. It is not currently possible to attribute specific costs or particular benefits to Wales alone. On a GB basis, to do nothing would provide no additional economic, environmental or social benefits and continued annual costs to the Exchequer of £320m, to which the Devolved Administrations do not contribute. The cost to industry for testing under the proposed legislation is Estimated at £15m per annum but the anticipated improved returns to producers and all parts of the meat industry, and possibly benefits to consumers via the availability of cheaper OTM beef for manufacturing, far outweigh this.

Consultation on proposals to amend the legislation on BSE testing to facilitate trade in cattle over thirty months for human consumption (10/3/2005 - 2/6/2005)

Ymgynghoriad ar gynigion i ddiwygio'r ddeddfwriaeth ar brofion BSE er mwyn caniatáu masnachu gwartheg dros dri deg mis oed i'w bwyta gan bobl (10/3/2005 – 2/6/2005)

List of consultees to whom copies of the consultation paper have been sent
Rhestr o'r ymgynghorwyr y mae'r papur wedi cael ei danfon

Agri food Partnership for Wales
Agri food Partnership for Wales
Associated Meat Co Ltd
British Veterinary Association North
British Veterinary Association South
Business Eye (previously Business Connect)
BWL George
Caernarfon Abattoir Ltd
Campaign for the Protection of Rural Wales
Cardigan Abattoir
Cardigan Abattoir Ltd
Chair of Welsh Lamb and Beef Suppliers
Cig Mon Group
Cig Mon Meats Ltd
Cig Oen Caron
Competitive Meats
Conwy Valley Meats
Country Land and Business Association
Country Landowners and Business Association
Countryside Council for Wales
Countryside Council for Wales
Cwmni Cig Arfon Ltd
D & J Thomas
D&B Meats
D&J Thomas
Dairy Strategy Group
Dawn Pac (West)
Dawn Pac Ltd
Direct Meat Supplies
DT Havard
Environment Agency Wales

ET Jones, Sons & Daughter
Fairfield Meat Co Ltd
Farm Assured Welsh Livestock
Farmers for Action
Farmers Union of Wales
Farming & Livestock Concern UK
Federation of Small Businesses in Wales
Food Technology Centre
Fribo Foods Ltd
GR Evans
Guild of Welsh Lamb & Beef
Guild of Welsh Lamb & Beef Suppliers
Hamer International Limited
Hughes Meats
Hybu Cig Cymru
I&B Jones
J Williams & Son
JE Tudor & Sons Ltd
JO Evans
Jones Bros
LACORS Wales
Marks Meats Ltd
Messrs B&B Webster
Mid Glamorgan Provisions
Mr L H Phillips
National Beef Association (Wales)
National Farmers Union
O Roberts A'I Faib
Organic Farming Centre for Wales
Oriol Jones and Sons Ltd
Owen G Owen Ltd
Pembrokeshire Meat Company
R G B Webster & Sons Ltd
R W Kennard
Red Meat Strategy Group
Royal Society for the Prevention of Cruelty to
Animals
Royal Welsh Agricultural Society
St Merryn Meat Ltd
Stanley Jones
T H Sutcliffe
TJ Thomas
Towers Thompson

TWM Ltd
Tywyn Wholesale Meat Co Ltd
W Lloyd Williams
WA James
Weddel Swift
Weeks Wholesale Meat Co Ltd
Welsh Black Cattle Society
Welsh Country Foods
Welsh Farm Organics
Welsh Food Alliance
Welsh Food Laboratories
Welsh Food Microbiological Forum
Welsh Food Promotions
Welsh Hook Meat Centre
Welsh Livestock Auctioneers Association
Welsh Meat Company
Welsh Meat Company
Women in Agriculture
Women's Food and Farming Union in Wales
WT Maddock