

Table of Contents

Foreword by the Monitoring and Reporting Commissioner	3
Section 1. Executive Summary	5
Section 2. Background to the UK Farm Assurance Review (UKFAR) and its Recommendations	9
2.1 A Summary of the UKFAR Process	
2.2 Main Themes Emerging from the UKFAR	10
2.3 Principal Organisations Assigned Tasks in the UKFAR Recommendations	
Section 3. Monitoring and Reporting - Phase 2 of the UKFAR	13
3.1 The Rationale for the Monitoring and Reporting Phase	
3.2 Maintaining Independence from the Sponsoring Bodies	
3.3 Scope of the Monitoring and Reporting Phase	
3.4 Timetable for the Monitoring and Reporting Phase	
Section 4. Monitoring and Reporting Methodology	
4.1 Initial Discussions with the Principal Organisations	
4.2 Constructing the Monitoring Survey Template	
4.3 The Monitoring Survey Period	
4.4 Analysis of the Monitoring Survey Responses	
4.5 Lessons Learned from the Monitoring Exercise for the Second Monitoring Round	
Section 5. Results of the Monitoring Exercise - Round 1	19
5.1 Developments Since the Publication of the UKFAR Report	
5.2 Key Areas of Progress	
5.3 Summary Assessment of Progress and Engagement with the Monitoring Exercise	
Section 6. Next Steps	
6.1 Preparing for the Second Monitoring Round	
6.2 Disseminating the Results of the Monitoring Exercise to the Wider Industry	
Annex 1: The Characteristics of Good Farm Assurance	
Annex 2: The 56 UKFAR Recommendations Summary Table	
Annex 3: Monitoring and Reporting Phase Terms of Reference	
Annex 4: Monitoring and Reporting Commissioner Biography	
Annex 5: Operating and Independence Principles for the Monitoring and Reporting Phase	
Annex 6: List of Organisational Participants in the Monitoring Exercise	
Annex 7: Supplementary Questions and Responses by Respondent Group	
Annex 8: List of Abbreviations	
Annex 9: Acknowledgments	123

Foreword by the Monitoring and Reporting Commissioner

It was a natural step for the sponsoring bodies of the UK Farm Assurance Review (UKFAR) to wish to understand how the recommendations in the Commission's report were being implemented. Not only were there a substantial number of them, but they pointed to a complex operating environment for farm assurance, with many participating organisations and varying interests in the assurance process. It was also clear that in seeking to effect change in the system a degree of momentum would need to be maintained. We have all seen other reports with far reaching recommendations that, following an initial round of publicity, appear not to be enacted, and there was a strong view that this should not happen in this instance.

With the appointment of a Monitoring and Reporting Commissioner, it was envisaged that a degree of oversight could be maintained so that this important issue for the farming industry could continue to be addressed. In that process, it was necessary to engage again with the organisations tasked to deliver the UKFAR recommendations. It should be noted that this remained a process of voluntary engagement. Although the UKFAR had identified them, or a group to which they belonged, as needing to take action, a positive response was not necessarily guaranteed.

We therefore opened up the exercise with introductory discussions with the identified organisations to explain what the monitoring round sought to achieve, the information we required and how they could participate. The fact that 40 organisations later made contributions to this report is a sign that there is a commitment, in time, to change the nature and delivery of farm assurance and to reaffirm the position of the farming community as a key part of the farm assurance system.

We note later in the report that progress is being made, not least by the farm assurance schemes. It is somewhat variable, and largely dependent on the starting position of the scheme, but it will be evident from the submissions that certain schemes are well advanced in meeting the recommendations, while some have more to do. There are also positive signs from other organisations, with the farming unions (NFUs) and the Agriculture and Horticulture Development Board (AHDB) taking on additional tasks to help deliver specific recommendations and work being undertaken by sector regulatory agencies and the Welsh Government (WG), as particular examples.

Disappointingly, other government bodies have not yet been as engaged as we might have wished. It remains to be seen, in the second monitoring round next year, whether they will play their part in driving improvements in the farm assurance system that could, in turn, assist with the development of government farming and food policies.

Of course, the acid test for all of this is whether the farming industry will see any difference on the ground – in the procedures associated with farm audits, in the information and communications they receive from farm assurance schemes and industry regulators and in the lessening of the overall burden associated with the current farm assurance system.

In some instances, this may take longer than originally anticipated in the UKFAR report, but the monitoring round has, at least, identified a willingness amongst many of those operating the system to consider these issues and to take steps to address them.

We have provided, in this report, the comments we received from the participating organisations, largely as they were submitted. This appeared to be the most effective way to demonstrate the actions they were taking, and to provide an indication of their progress relative to others in the system. Not all of the recommendations have been met with full approval, but we have included the comments where this is the case, in the interests of transparency.

Finally, whilst we asked contributors to report, in particular, on the actions they had taken to address the UKFAR recommendations, we received a mixed bag of submissions. Some were thoughtful, setting out what they had done or were in the process of doing; some were rather more hopeful, indicating that they remained in discussion on the matter at hand, but had not yet taken much action; and some were resistful, lacking any real evidence of change and relying on a desire to maintain the status quo.

Given the broad nature of the farm assurance system, and the organisations working with it, such a mix of responses might have been expected. But if there is any prospect of improving the overall system,

we will need to see more of the former, rather than the latter responses, during the next monitoring round.

In the meantime, I should like to thank everyone participating in the monitoring exercise for the time and effort they have put in to addressing the UKFAR recommendations and for contributing to this report. There remains more to be done, but we are, at least, beginning to see early, and welcome, progress in many of the areas covered by the UKFAR's recommendations.

Dr David Llewellyn Monitoring and Reporting Commissioner, UK Farm Assurance Review October 2025

Section 1. Executive Summary

The Report of the UK Farm Assurance Review (UKFAR) was published in late January 2025. It made 9 strategic recommendations and 56 operational recommendations expanding on the topics covered by the strategic recommendations. Each of the 56 recommendations was supported by a clear rationale and each contained a proposed deadline for delivery and a description of who should take responsibility for action.

With its wide range of recommendations, a complex operating environment and other priorities facing the farming industry, there was a risk that improvements to the farm assurance system might not be given further attention. To mitigate against this risk, the UKFAR sponsoring bodies agreed a further phase of work to monitor the actions of those organisations assigned tasks in the UKFAR recommendations and to produce two reports on progress, broadly aligned with the 6 and 12 month reporting timescales for most of the recommendations set out in the UKFAR Report. The monitoring of actions was to include the Review's sponsoring bodies, each of which had been assigned actions in the list of recommendations.

The time taken by the sponsoring bodies to consider and consult on the UKFAR Report meant that this phase of work began in mid-March 2025 with the appointment of the Monitoring and Reporting Commissioner. The appointment of Promar International in a continuing role as the UKFAR secretariat followed later that month, enabling the initial monitoring tasks to commence in early April 2025 with a series of online meetings with participating organisations.

A total of 51 organisations (including, in some cases, members of organisational committees) were involved in the initial discussions about the UKFAR monitoring and reporting phase. These included the farm assurance schemes included in the UKFAR report, all 4 UK governments, several government agencies, a range of farming and food representative organisations, 7 of the 8 major UK supermarket retailers and a selection of food processing companies drawn from those that had participated in the UKFAR research.

The response to the initial discussions was generally positive, though varied depending on the type of organisation and their role within the farm assurance system. More negative, or at least cautious, feedback, particularly about the role of the farming industry in taking a more prominent role in setting farm assurance standards, was received from some major supermarket retailers. These points were discussed and the way in which the UKFAR Commissioners had reached their decisions was explained. Each organisation was invited to take part in an evidence gathering survey during the summer of 2025.

The survey instrument was tailored to recommendations relevant to the named organisation(s) so that they did not receive recommendations to which they were not expected to respond. A total of 11 templates were constructed in this way, to cover, for example, each of the farm assurance schemes, government departments and regulatory agencies, retailers and processors, organisations such as the AHDB and each of the national farming unions. Each recommendation response also invited participants to indicate, on a 5 point scale, their compliance at that stage with the recommendation. Further details of this approach are set out in Section 4.2 of this report.

In total, 40 responses to the call for evidence were eventually received, including some written submissions, not employing the survey instrument. The survey results were analysed in September and at the same time, the background elements of the Monitoring Report were assembled. The completed analysis of the survey results was incorporated in the Monitoring Report in early October.

It should be noted that, at this point of the monitoring exercise, the responses sought from participating organisations were focussed on actions required for the 3 and 6 month implementation timescales, though responses for actions with a longer timescale were also invited and received. A second report, in the Spring of 2026, will allow further progress on these and other recommendations to be submitted, particularly with regard to actions taken to implement those with a 1 year timescale.

In general, submissions to the monitoring exercise from farm assurance schemes were positive, but somewhat variable in their nature and content. Many addressed the recommendation at hand, providing helpful background information and reporting on recent progress or indicating their compliance with the recommendation, either with new work or actions previously taken. In other instances, the submissions

were not as clear. Some of the grading responses to the recommendation did not entirely match the corresponding narrative statement. In others, the submission did not refer to action taken to implement the recommendation, but rather to a general view about issues with the farm assurance system. Yet others took issue with the recommendation, as either being impractical, or not in accordance with their business model or current decision-making structures. It will be for those organisations, and their members, to ultimately determine whether a change of approach is required to address the concerns raised in the UKFAR report. For the time being, the monitoring exercise has simply recorded the responses, so that they can be compared to others across the farm assurance system.

There were also instances of submissions being notable by their absence. Three of the 4 UK Governments have yet to make a substantive response on recommendations where their action was requested, or even a progress report on their work to date. As a result, there is currently a gap in analysing progress on key aspects of the Review that it is hoped can be addressed in the second monitoring report in the Spring of 2026.

The submissions from the AHDB and NFUs indicated that they are maintaining a spotlight on farm assurance developments and taking action to comply with the requirements of the relevant recommendations. Whilst, as sponsoring bodies for the UKFAR, this might be expected, it is nonetheless good to see the embedding of farm assurance in other aspects of their work, including with farm assurance schemes in their respective jurisdictions.

It was also encouraging to see the detailed response provided by the Food Standards Agency (FSA), outlining the work it is undertaking, sometimes in conjunction with farm assurance schemes, to clarify its role in the regulatory inspection regime, how this operates with the farm assurance system and improvements on which it is working.

There appears to be a willingness amongst farm assurance schemes to develop technologies to assist the delivery of audits, gather data on audit performance, and to ensure that it helps to reduce the overall effort associated with the assurance system for the farming industry. Again, assurance schemes are at different stages with this work and much remains to be done to provide a consistent approach to the 'tell us once' principle noted in the UKFAR report. The AHDB's Farm Data Exchange project may assist in that endeavour.

However, there remains work to be completed on the issue of data ownership, and whether a large scale data co-op is feasible for the farm assurance system. At the moment, individual schemes are either introducing audit portals or, where they are already available, have sometimes taken the view that it should be for farmers to decide if they wish to use such technologies, rather than this being a mandated approach. It follows that the recommendation about supporting farmers with this transition also varies in its implementation, though there are signs that work is in hand, by some schemes, to address this issue.

There also remains work to be done to deliver a "proof of concept" for alternative farm assurance methodologies. It was noted that the AHDB is supporting the Association of Independent Meat Suppliers (AIMS) with the development of its Vetasure product to meet this objective. The recommendation to regularly review emerging technologies of this nature has not yet been addressed, but it was helpful that both AgriTech E and the UK Agri Tech Centre are willing to assist with this initiative when others in the farm assurance system are ready to take this step.

Progress has been reported by the AHDB on compiling a statement of direct environmental legislation, (for its mandated sectors) which was to have been refined further at a meeting with farm assurance schemes in September. The next step will be to determine, with Government and its regulators, where there is scope to achieve greater compliance by the industry, but not necessarily as part of the farm assurance system.

The AHDB also reported that this was a complex area of work and required further discussion with the NFUs on the best approach to take. The possibility remains that food chain organisations relying on a farm assurance based approach to meet their reporting obligations on environmental matters might decide to adopt alternative routes, leading to further fragmentation in data collection and increased workloads for farm businesses. It is therefore important for the farming industry to support the AHDB

and NFUs in their work on this topic to see if a more streamlined and coherent approach can be achieved.

Food chain businesses responding to the monitoring exercise have taken a variety of views, some noting that they already recognise performance on a variety of measures in their contractual arrangements or by others means (such as access to advice and consultancy to help improve the farm business). Other organisations took the view that the cost-sharing approach for environmental data suggested in the UKFAR's recommendations was something that would not be supported, and it would be for farm businesses to meet reporting obligations or look elsewhere to sell their products.

The first recommended step of providing greater clarity on the legal baseline on environmental matters in farming, therefore looks to be helpful in determining what it is that farmers must do, rather than what they are being asked to do above this baseline in their contractual arrangements with other food chain businesses. It is not the case that such arrangements are wrong, or that farmers may not wish to deliver them to fulfil a contract, but at least information to support the decision taken by the farmer might be clearer and the reward mechanism, whatever that might be, for any additional work or data of value, can be more transparently set and agreed.

This principle extends to the concept of "earned recognition", where the Commission called for greater clarity around arrangements with Governments and their regulatory agencies. As yet, there is no clear indication that the concept of "earned recognition" is being progressed by the Department for Environment, Food and Rural Affairs (DEFRA), and we await further news on this aspect of the Review's recommendations. Further information from the Northern Ireland Department of Agriculture, Environment and Rural Affairs (DAERA) and the Scottish Government would also be welcome during the second monitoring round.

The AHDB is currently involved with a review of the Oilseeds and Cereals sector. It will be important for a fully timed plan to be produced for the next monitoring report so that there is greater clarity about the future approach for assuring UK combinable crops, as well as more evidence about how UK assurance standards compare with those from major trading nations. It was noted that the NFU Combinable Crops Board has had a particular focus on the consistency of assurance approaches and its activities have included a bespoke blog/update from the board chair, providing a crops specific response to the UKFAR recommendations.

The UKFAR report also made a number of recommendations about communications with farmers and the culture change necessary in some farm assurance schemes to ensure that the "farmer voice" was taken into greater consideration. As noted in the report, this was not the case amongst all schemes, but it was required in some instances to rebuild trust between the schemes and their farming constituencies.

We received detailed responses setting out the various ways in which farm assurance schemes interact with their farming members, with the prospect of improvement where this had not previously been regarded by farmers as a strength of the scheme. There were also indications that the issue of culture change had been taken on board, though much will depend on how this extends to the practice of farm assurance, the future avoidance of "mission creep" and the implementation of earlier recommendations arising from the Review about, for example, the nature and conduct of farm assurance and the setting of scheme standards.

These, and other elements of progress within this report point to an understanding that the farm assurance system must evolve to take greater account of the farming community. In some cases, early stage actions are already embedded in the practices of some farm assurance schemes, whilst others have more to do.

Farming organisations are fully engaged in the delivery of change, though the complex nature of tasks assigned to them may result in longer than expected timescales for implementation. There are encouraging signs of developments from some industry regulators, but these are not always backed up by some government departments, who should be called upon to do more to help improve the farm assurance system. There also remain some difficult topics to address around the scope and scale of farm assurance, what it should and should not include and how farming members of schemes might be compensated for additional work built into farm assurance standards. It is hoped that further progress

on some of these matters may be made in the coming months, in the run up to the second monitoring round in the Spring of 2026.

Section 2. Background to the UK Farm Assurance Review (UKFAR) and its Recommendations

2.1 A Summary of the UKFAR Process

In early 2024, the National Farming Unions (NFU, NFUS, NFU Cymru and UFU (together the NFUs)) and the AHDB agreed that a comprehensive review should be undertaken to address growing concerns within the farming industry about the nature, purpose and operation of the UK farm assurance system. A Commission was appointed to undertake the Review which considered extensive industry surveys, interviews, case studies and available literature, together with comparative analyses of international farming and food assurance schemes.

This was the first such review of the system in the 40 years, or so, since UK farm assurance schemes were introduced in the 1980s and 1990s. Direct engagement with all parts of the UK food supply chain ensured that a wide variety of views about farm assurance were considered. Amongst other evidence the Review received 3,616 farmer survey responses, heard from 162 other supply chain respondents and employed the results of an analysis of online discussion forum content to provide an indication of how farmer sentiment towards farm assurance had changed in the period from 2019 to 2024.

The Review also explored some of the issues behind the discontent with the farm assurance system that had emerged from the evidence submitted to the Commission. These ranged from the wider political and policy environment for farming, to the sense that the original purpose of farm assurance had been diverted to the needs of other agents in the food supply chain, and from bureaucracy associated with certain farm assurance schemes - to the impact of the "make or break" nature of assurance in some farming sectors on farmer mental health and wellbeing.

It was evident that farm assurance schemes, of which 12 were considered in detail by the Review, had different levels, and methods, of engagement with their farming communities. They also have differing governance structures supporting that engagement and varying levels of trust between the schemes and their farmer members. The issue of trust was a particular concern to farming businesses where membership of a scheme was an essential route to market, but where it was felt that the scheme was not supporting farming businesses, nor offering them the market differentiation, or price premium, they had originally expected.

Similar views emerged from others in the supply chain who expressed concern that some farm assurance schemes were not meeting their expectations, in terms of delivering their external reporting obligations or ensuring that the audit process met their internal requirements for consumer confidence in their products.

That said, it was also evident that the relationship between farming members and their farm assurance schemes was better in some cases than in others. The Commission referred directly to the Red Tractor (RT) scheme, the largest in the UK farm assurance system and the subject of much, often negative, attention in the evidence it received. Other schemes, particularly, those operating in the devolved nations, were better supported by farmer respondents. Some of the factors behind these varying responses were explored during the Review and were featured in its report.

The Commission was expected to consider the farm assurance system through the lens of the "value delivery to primary producers but not ignoring the needs of onward businesses and end consumers" It was clear from the evidence that there were significantly different views, across the food supply chain, about who should determine the standards associated with assurance schemes and how those standards should provide value to farm businesses. There were concerns from some farming sectors about the standards associated with imported food products, how these were controlled and how the market operated to ensure a level playing field between imported food and UK produce. There were also major concerns about the overlap between farm assurance and regulatory compliance, growing demands for information being placed on farm businesses with no clear reward structure and an overall view that the system was subject to "mission creep".

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¹ UK Farm Assurance Review Terms of Reference, April 2024

In all of this, it was also clear that farm assurance had inconsistently featured in the farming policy environment across the UK nations and had largely been left to the market to address. This was despite the fact that the assurance system could be of benefit to future policy development or could be better employed to generate "earned recognition" by governments and their regulatory agencies.

The Commission concluded that farm assurance was a necessary and important component of the food production landscape, principally because it should provide reassurance to consumers that the food they purchase is produced to consistent and high standards. However, the many complexities and concerns expressed in the evidence the UKFAR received, meant that it also concluded that farm assurance had to be improved. Although the system was generally supported **in principle**, there was much that was not right **in practice**, from addressing the frustrations expressed by the farming community to better informing consumers about what farm assurance is, what it delivers and how it works. It was also expected that there would be a continuing debate about the power dynamics within the farm assurance system; how it can deliver necessary information to meet the needs of a wide variety of stakeholders whilst also reducing the burden on farm businesses; how it can be more consistently applied; and how there could be a shift in the view of farmers that farm assurance is being "done to them" rather than "delivered with them".

The Report of the UKFAR was published in late January 2025. It made 9 strategic recommendations and 56 operational recommendations expanding on the topics covered by the strategic recommendations. Each of the subsets of the 56 recommendations was supported by a clear rationale, and each contained a proposed deadline for delivery and a description of who should take responsibility for action. It was recognised that the delivery timetable in many cases would be challenging, but the Commission felt it important to maintain momentum to improve the farm assurance system, given that a period of around 16 months had elapsed since farm assurance had been highlighted in the debate about the introduction by Red Tractor of the Greener Farms Commitment. There had also been longer term concerns about "mission creep" within the system. At the same time, it was clear that decision-making structures within some farm assurance schemes might require a small degree of leeway in the implementation timetable to ensure that proper consultation on changes had taken place. These factors are discussed later in this report.

2.2 Main Themes Emerging from the UKFAR

Based on the evidence considered by the Commission the UKFAR Report identified, and explored in depth, 11 key themes. These were:

- 1. Issues with the audit process and its impact
- 2. The role of technology
- 3. The voice of farmers within farm assurance
- 4. Who should pay for farm assurance?
- 5. How can farm assurance be improved?
- 6. Duplication of schemes and earned recognition
- 7. The environmental challenge
- 8. Collaboration between farm assurance schemes
- 9. Farm assurance and positioning the UK agri-food sector
- 10. A need for better supply chain communication
- 11. Farm assurance training and development

The 9 strategic recommendations made by the Commission built on these key themes. Eight of the strategic recommendations covered the farm assurance system in general, while the ninth considered the implementation by the Red Tractor scheme of the earlier recommendations of the Campbell Tickell report on the scheme's governance².

The Commission also identified several common characteristics where farm assurance was working, or was perceived to be working, well. These features are set out in more detail in Annex 1 and were used to frame the Review's recommendations. In turn, each characteristic will also have a bearing on

² Campbell Tickell, Red Tractor Independent Governance Review, 2024

the way in which the Commission's recommendations are implemented, and how the success of that implementation can, in due course, be assessed. In summary, these characteristics are deemed to be as follows:

- 1. Strong leadership clarity of purpose
- 2. Regular review
- 3. Transparency (of operation and standards development)
- 4. Collaboration (between different players within the food system)
- 5. A focus on delivering value to participants
- 6. Consistency and continuity
- 7. A clear, transparent and proportionate approach to enforcement
- 8. Healthy competition

It was anticipated that the adoption of the Commission's recommendations would be necessary across the food supply chain, to ensure the better operation of the food assurance system, and to address the perception of unfairness within the system felt by some in the farming industry. The requirement for an improved system was shared by most respondents across the industry, so long as it ultimately brought value to all stakeholders, and that it helped deal with the loss of trust that had been developing for some time, between some farm assurance schemes and their constituencies.

The UKFAR strategic recommendations were as follows:

- 1. On-farm audits must be reduced, simplified and delivered more consistently
- 2. There must be a transformational step forward in embracing technology and managing data to deliver more effective farm assurance with greater added value for all
- 3. Farm assurance schemes need to reset and/or restate their decision-making structures to establish farmers as the driving voice in standards development
- 4. A new industry-led initiative must set out the future environmental ambitions for farm assurance, establishing this as an area of competitive advantage for UK farming
- 5. The inclusion of regulatory requirements within farm assurance standards and audits should be conditional on government and regulators agreeing a form of "earned recognition"
- 6. There must be greater coordination in the way in which farm assurance operates across the UK nations
- 7. Farm assurance schemes must better position the UK farming industry in world food markets and in competition with imported food
- 8. All farm assurance schemes must review, and, where necessary, improve their methods of communication with the farming industry
- 9. The Red Tractor (RT) scheme must complete the implementation of the recommendations in the Campbell Tickell report

The 56 operational recommendations are contained in Section 5 of this report, together with a table, at Annex 2, taken from the Commission's Report, that sets out each of the recommendations, their target date for implementation and the organisations that were identified as being responsible for their delivery.

2.3 Principal Organisations Assigned Tasks in the UKFAR Recommendations

In formulating its operational recommendations, the Commission sought to ensure that they would be implemented in a timely manner. To achieve this, it was necessary to identify the organisation(s) that were best placed to take the necessary actions where they had wider impact, or where actions needed to be taken within their own operations.

The Commission's consultation process revealed the complexity of the farm assurance system, operated as it is by various schemes, each with their own approach to audits via their selected certification bodies. In addition, the varying relationships between those schemes, industry regulators and each of the UK governments; the role of processors and retailers in the system; the role of the ownership body for the Red Tractor scheme; and the overarching requirements for accreditation of farm assurance scheme providers, meant that it was necessary to name, in some cases, groups of organisations from which action was required. The following list is intended to assist with the identification of constituent members of these groups:

- 1. NFUs principally the NFU, NFUS, NFU Cymru and the UFU, but recognising that other union organisations exist, but were not involved as sponsoring bodies of the Review, such as the FUW and BFU
- 2. Farm Assurance Schemes principally the 12 schemes considered in detail during the Review, but also those 'add on' schemes operated by food processors and retailers where the recommendation was relevant to them, for example in removing duplication between assurance requirements
- 3. Industry regulators principally the FSA, Environment Agency (EA), Natural England, Trading Standards and their equivalent bodies in the devolved nations
- 4. Farming support organisations principally the Farming Community Network (FCN), Royal Agricultural Benevolent Institution (RABI), Royal Scottish Agricultural Benevolent Institution (RSABI) and Rural Support, but not to the exclusion of other relevant organisations and agencies
- 5. The DEFRA Data Group Food Data Transparency Partnership
- 6. New scheme developers organisations working on technologies that might assist with the improvement of the farm assurance system
- 7. Government Ministries/Departments and relevant agencies the principal farming and food Ministries of the 4 nations of the UK, together with (where relevant) their respective regulatory bodies
- 8. Food chain businesses/industry representatives businesses beyond the farm gate, including food processors and major retailers, within the UK food system
- 9. Combinable Crops Sector representatives and their customer base organisations involved in this sector, such as the Agricultural Industries Confederation (AIC), UK Millers Association, relevant committees and other representative groups, such as those within the AHDB, NFUs and relevant farm assurance schemes such as RT and Scottish Quality Crops (SQC)
- 10. RT Ownership Organisation the NFU, NFUS, UFU, AHDB, Dairy UK and the British Retail Consortium (BRC)

As they were grouped in this way, it was expected that the constituent members would work together (with others as necessary) on recommendations requiring greater coordination to ensure that a "joined up" approach was taken to the relevant action plan.

In other instances, such as those involving single bodies, for example the AHDB, the recommendations may have related to action required by that body or a coordinating/leadership role assigned to that organisation. In the latter cases, it might be expected that the coordination of a response would take time to implement, and this has been considered in the reports of progress to date.

Certain organisations that were not named in the recommendations, such as, for example, the United Kingdom Accreditation Service (UKAS), the National Accreditation Body for the UK, might impact on the implementation timetable for actions required by, in this instance, farm assurance schemes. This is because UKAS has the role of assessing "against nationally and internationally agreed standards, organisations that provide conformity assessment services such as certification, testing, inspection, calibration and verification" and may therefore be involved in approving changes to standards or methods used in the farm assurance system.

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³ UKAS website, accessed 25 September 2025

Section 3. Monitoring and Reporting - Phase 2 of the UKFAR

3.1 The Rationale for the Monitoring and Reporting Phase

With many recommendations, a complex operating environment and other priorities facing the farming industry, there was a risk that the UKFAR Report would not be given further attention and that its recommendations might not be enacted. To mitigate against this risk, the sponsoring bodies agreed that a further phase of work was required to monitor the actions of those organisations assigned tasks in the UKFAR recommendations and to produce two reports on progress, broadly aligned with the 6 and 12 month reporting timescales for most of the recommendations set out in the UKFAR Report. The monitoring of actions was to include the Review's sponsoring bodies, each of which had been assigned actions in the list of recommendations.

Importantly, the sponsoring bodies took the view that it would be important to feed back to the wider farming industry, and to other organisations impacted by or using the farm assurance system, on progress being made with the implementation of the UKFAR recommendations. Although initially reporting to the sponsoring bodies, the Monitoring and Reporting Commissioner was asked to then publish the reports so that they could be considered by industry and farm assurance stakeholders.

The reports were expected to be produced on a "comply or explain" principle. This approach is well established in the world of corporate governance, where organisations are expected to provide an explanation of how they have met reporting requirements, in this case, the actions set out in the UKFAR recommendations, or to explain why they have not complied. The approach allows for a degree of flexibility to highlight external factors impacting on progress, whilst maintaining accountability for actions using transparent and publicly available reporting.

It is recognised that in this type of exercise relies, in turn, on the quality and transparency of responses to the monitoring of progress and the engagement of those to whom actions have been allocated. Furthermore, in this instance, any engagement in the UKFAR process is not mandatory, but relies on the willingness of organisations to participate with the aim of improving the farm assurance system. In the world of corporate governance, it is expected that investors should hold companies accountable, if they do not consistently comply with expectations placed upon them. In this instance, the wider industry will be able to take a view about the progress made against the UKFAR recommendations and the seriousness with which they are being taken by organisations that might be expected to play a significant role in improving the farm assurance landscape.

The time taken by the sponsoring bodies to consider and consult on the UKFAR Report meant that this phase of work began in mid-March 2025 with the agreement of Terms of Reference (see Annex 3) and the appointment of the Monitoring and Reporting Commissioner (see the Biography at Annex 4). The appointment of Promar International in a continuing role as the UKFAR secretariat followed later in the month and enabled the initial monitoring tasks to commence in early April 2025.

3.2 Maintaining Independence from the Sponsoring Bodies

The UKFAR Commissioners took early steps to agree with the sponsoring bodies a statement of principles that would ensure their independence of operation and reporting. This enabled the Commissioners to openly investigate the farm assurance system and the role of various organisations within it, to gather evidence from a wide variety of stakeholders and to report "without fear or favour" on the conclusions drawn from that evidence.

For this phase of the UKFAR, the statement of principles has been updated and agreed between the Monitoring and Reporting Commissioner and the sponsoring bodies. This was a particularly important step, not least because the sponsoring bodies had actions listed against them in the UKFAR recommendations. Transparent monitoring and reporting on their progress would be required in just the same way as other organisations identified in the Review's Report. The Statement can be found in Annex 5.

The Monitoring and Reporting Commissioner met, periodically, with the sponsoring bodies' Farm Assurance Review Leadership Group (FARLG) during this phase of the UKFAR to update the group on progress and to encourage members of the group to participate fully in the monitoring exercise.

3.3 Scope of the Monitoring and Reporting Phase

The monitoring exercise focussed on obtaining reports on progress from the principal organisations named in the UKFAR recommendations. During the exercise, we received a small number of enquiries asking if other organisations were to be invited to make submissions. It was explained that this phase was not intended to provide a further consultation on the subject of farm assurance, which was covered comprehensively in the UKFAR report.

A total of 51 organisations (including, in some cases, members of organisational committees) were involved in the initial discussions about the UKFAR Phase 2. These included the farm assurance schemes included in the UKFAR report, all 4 UK governments, several government agencies, a range of farming and food representative organisations, 7 of the 8 major supermarket retailers and a selection of food processing companies drawn from those that had participated in the UKFAR research.

The monitoring survey instrument was sent to a total of 57 organisations. This list included several organisations that had not taken part in the initial discussions (usually because they had failed to respond to initial enquiries) but were likely to have a part to play in the implementation of the UKFAR recommendations by falling into one of the groups identified in the assessment of principal organisations described earlier in this report.

One major supermarket retailer decided, early on, not to take part in the UKFAR research and hence was not involved in the monitoring phase. One organisation involved in the Red Tractor Ownership Body also did not participate, opting out of further communication on the basis that the UKFAR was not a priority for them.

Another major supermarket retailer, though having earlier committed to participation in the exercise, later decided not to respond to the monitoring survey because it did not agree with some of the recommendations in the UKFAR Report.

3.4 Timetable for the Monitoring and Reporting Phase

The monitoring exercise began in early April 2025. This provided time for the participating organisations to take on board the recommendations arising from the UKFAR report and the role they might be expected to play in their implementation.

Initial discussions with participating organisations took place over the period from 8 April to 18 June 2025. It was originally intended that this process would be shorter, but there were delays in the availability of some organisational representatives that extended the consultation period.

In the latter stages of the initial discussions, the monitoring template was assembled, so that it was ready for circulation to the survey cohort on 17 July 2025. Regular completion reminders were sent during the survey period which ended on 1 September 2025. Towards the end of this period, it was also necessary to undertake follow-up telephone calls to gather responses from several participating organisations.

The survey results were analysed in early September. At the same time, the background elements of the Monitoring Report were assembled. The completed analysis of the survey results was incorporated in the Monitoring Report in early October.

The Monitoring Report was submitted to the sponsoring bodies later in October. Given the independent nature of the Phase 2 exercise, no changes were made to the text of the Report by the sponsoring bodies.

In accordance with the UKFAR Phase 2 Terms of Reference (TOR), a second monitoring round will be held early in 2026, so that an update on progress can be made again in the early Spring of that year.

Section 4. Monitoring and Reporting Methodology

4.1 Initial Discussions with the Principal Organisations

A series of online introductory discussions was conducted by the Monitoring and Reporting Commissioner with the organisations identified in the UKFAR recommendations. These took the form of semi-structured interviews that were intended to explain the role and purpose of the Monitoring and Reporting Phase and to obtain early-stage responses on the views of the organisations towards the UKFAR recommendations and their potential for implementation.

The response to the initial discussions was generally positive, though varied depending on the type of organisation and their role within the farm assurance system. More negative, or at least cautious, feedback, particularly about the role of the farming industry in taking a more prominent role in setting farm assurance standards, was received from some major supermarket retailers. These points were discussed and the way in which the UKFAR Commissioners had reached their decisions was explained.

All of the participants in the initial discussions agreed to take part in the monitoring survey, and the timetable for its release and completion was explained to them. Importantly, the need was stressed for respondents to focus on actions taken by their organisation to comply with the recommendations, rather than providing statements of intent. Notwithstanding this request, respondents were also encouraged to report any external factors that had led to a delay in action being taken, so that they could be considered in the second monitoring round.

In one or two instances, second meetings were requested by participating organisations, either to clarify what was expected of them in the monitoring exercise, or to explain issues they had with their role in farm assurance or in relation to other organisations in the system. In each case the issues were satisfactorily resolved, such that the organisations agreed to go ahead with the monitoring survey.

Each of the discussions, held on MS Teams, was recorded and a summary transcript of the meeting was provided using MS Copilot. Each summary was shared with the interviewee to ensure that it accurately represented the contents of the discussion.

4.2 Constructing the Monitoring Survey Template

The 56 operational UKFAR recommendations were broken down into sub-sections assigned to each of the groups of participating organisations identified earlier in this report, or to individual organisations where this was required for certain recommendations. In this way, the survey instrument was tailored to recommendations relevant to the named organisation(s) so that they did not receive recommendations to which they were not expected to respond. A total of 11 templates were constructed in this way, to cover, for example, each of the farm assurance schemes, government departments and regulatory agencies, retailers and processors, organisations such as the AHDB and each of the national farming unions.

Each template contained an introductory note reminding participants of the initial discussions, explaining the approach to be taken to the completion of the survey and setting out the deadline for completion. Participants were also reminded, as had been covered in the initial discussions, that the results of the survey would be used to compile the first of the monitoring reports.

As the purpose of the survey was to elicit information on actions that had been taken, each recommendation in each of the templates was followed by a question asking respondents to indicate which of 5 statements best described their current compliance with the recommendation.

Two further scale ratings were added to the original five. The first was for organisations that had not provided a rating but had provided a narrative comment in their response and the second was for organisations that had simply not responded to the survey question. The full scale was therefore:

- 1. Already compliant
- 2. Imminently compliant
- 3. Compliant in the future, but missed the deadline
- 4. Will not be compliant, but have made different changes

- 5. Will not be compliant and do not plan to make any changes
- 6. No rating provided with the narrative comments
- 7. No response

Category 4 was included, because it was evident from the initial discussions that some respondents were already working on improvements to their farm assurance scheme that differed from, but were related to, the theme of the UKFAR recommendation.

Respondents were then asked to provide an explanatory note with further information about the steps they had taken to address the recommendation or, alternatively, why they were not addressing the recommendation at that point or had no plans to do so.

Each template was structured so that recommendations with a 6-month deadline appeared first and were ordered in the way that they had appeared in the UKFAR Report, for ease of reference back to the original text. Recommendations for the relevant respondent, but with a later reporting deadline, were also included so that answers could be provided if the organisation had acted well in advance of the recommended deadline.

In all but one case, supplementary questions were added at the end of the template to obtain further information on topics such as how an organisation was coordinating its improvements in farm assurance with others, or how environmental information required for mandatory reporting might be obtained if not through the farm assurance system. These questions were tailored for each template, depending on the organisation, or organisational group, to which the template was addressed.

The monitoring survey templates were translated into an online survey format using a JISC⁴ survey. This allowed respondents in almost all cases to partially answer the survey and to return to complete their response at a later date. In a small number of instances reported to Promar International, technical issues with the JISC survey software meant that responses could not be saved in this way, so, when notified, the respondent was sent an MS Word version of the template for completion.

4.3 The Monitoring Survey Period

Apart from email reminders there was limited contact between the Monitoring and Reporting team and participating organisations during the survey period, to enable the organisations to have time to deal with their response to the survey. There were, however, a handful of instances where further clarification was sought by survey participants, or where some participants were aware of steps being taken by other organisations that might impact on their work, or their survey response, and sought advice on what they should do. These were picked up by the team and discussions were held with the respective parties to resolve the issue.

The Monitoring and Reporting team was also aware of meetings being held between various organisations, both before and during the monitoring survey period, to coordinate their responses to the UKFAR recommendations. The team did not participate in these meetings so that they could remain independent of any discussions taking place.

The team was, however, supportive of efforts made by some groups of organisations, such as the farm assurance schemes, to meet to discuss several of the recommendations where coordination between schemes was required. The Monitoring and Reporting Commissioner was, for example, invited to attend one such meeting, around the time of the publication of this report, to act as an observer and to assist in the clarification of the Commission's expectations in relation to the relevant recommendations.

4.4 Analysis of the Monitoring Survey Responses

We received 34 survey responses from the principal organisations, including 3 that provided an additional written document outlining their thoughts and actions since the beginning of the UKFAR. In addition, 6 organisations provided a written statement, but did not provide a response to the formal survey. These submissions were reviewed alongside the survey responses. A list of the 40 participating organisations appears at Annex 6.

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⁴ https://www.jisc.ac.uk

Two organisations contacted us in the early stage of the survey to confirm they would not provide a response. Another 15 organisations did not respond to repeated communications throughout the survey process.

The lack of meaningful responses from 3 of the 4 UK governments was particularly noteworthy. Despite repeated requests, we were unable to obtain a response from DAERA. The DEFRA response simply noted that work was in progress.

The response from the Scottish Government, noted that the questions appeared quite complex, requiring closed structured responses and that it was not comfortable in providing a response to the survey in the limited time available. However, rather than recording a nil response they wished to add that they viewed farm assurance as a market mechanism for producers and consumers to share a common understanding of the provenance of the assured produce. This was considered to be separate for statutory requirements, though they clearly interact. They remained open to engagement around that interaction including later consideration of the findings of the Review.

As noted earlier, the UKFAR report contained an indication of the organisations that were expected to act, together with a timescale for their implementation, for each of the 56 operational recommendations. The particular recommendations and timescales for action, together with the anticipated timing of the survey, were also discussed in the initial interviews with participating organisations. In some cases, group references were used to indicate those expected to act (for example, Farm Assurance Schemes). The responses to the survey were similarly grouped for analysis, though it was possible for other survey respondents to comment on recommendations where action from them had not been directly required.

It should also be noted that, at this stage of the Monitoring exercise, the responses sought from participating organisations were focussed on actions required on the 3 and 6 month implementation timescales. A second report, in the Spring of 2026, will allow further progress on these recommendations to be submitted, in addition to actions taken to implement those with a 1-year timescale.

The submissions were initially analysed by responses to the rating scale for each of the 56 operational recommendations, indicating the organisation's position with regard to each recommendation. These are presented in the Section 5 in the form of tables, for ease of reference.

The narrative statements were then analysed to identify comments pertaining to the recommendation and to highlight areas where progress had been made, as well as those where there may have been external issues impacting on the implementation of the recommendation. The extent of the commentary was determined by the survey responses, and it will be seen that some are more detailed than others, while in recommendations with a longer implementation period, there may not have been any progress reported at this point. The supplementary questions/responses added to each survey template are summarised in Annex 7.

A broader discussion of the survey responses and their indications of progress to implement the recommendations is provided later in this report.

4.5 Lessons Learned from the Monitoring Exercise for the Second Monitoring Round

The use of a rating scale to ascertain a general indication of progress in implementing each recommendation proved useful and will be repeated in the second monitoring round. The varying nature of the narrative statements provided by survey respondents made analysis more difficult, especially where it was not clear whether action had been taken or organisations were still relying on statements of intent, commentary on the recommendation or their views about what others should do to resolve the point under discussion.

Further clarification of the requirements for the second monitoring round will hopefully address the need for statements of action taken to implement the recommendation.

There were some instances of difficulty in accessing the survey instrument. Whilst only a handful of such cases were identified, measures to deal with this technical problem were taken and will be

available to organisations in the second monitoring round, should the same software compatibility issues be encountered.

Other organisations decided to make a written submission instead of using the survey instrument. Whilst these submissions were welcome, it meant that further work was required to analyse the submissions, and the rating scale entries were inevitably missing. Further encouragement to use the survey instrument will be given for the second monitoring round.

In some instances, it also proved difficult to obtain responses to the survey in accordance with the submission deadline. Several attempts were made to deal with this issue before the deadline and organisations that had not responded in time were contacted afterwards to encourage them to submit.

This yielded some positive results, but delayed later stages of the monitoring round. It is recognised that this is a voluntary initiative and that organisations must be willing and able to participate, but it is also important that progress is maintained across the complex landscape for farm assurance so that the overall system is eventually improved.

The timing of the survey, over the summer, may have had an impact on completing submissions, and it is hoped that the second monitoring round, in early 2026, will not encounter the same issue.

Section 5. Results of the Monitoring Exercise - Round 1

5.1 Developments Since the Publication of the UKFAR Report

Early farming press coverage of the publication of the UKFAR Report, in January 2025, was followed by a period in which farm assurance schemes and other principal organisations took time to consider the report's recommendations and develop their plans to address them. In some cases, it was necessary for the organisation to consider the recommendations against progress already made on earlier plans to develop their farm assurance scheme. In other cases, it was necessary for organisations to consult with their members in the formulation of their response.

A number of organisations issued early statements welcoming the report and setting out their initial responses to the Review. Later statements provided more detailed responses on plans for change. These included, in March, Red Tractor⁵, and in April, the NFU⁶ and the AHDB⁷. At the same time, other developments in farm assurance, such as the introduction of tiered welfare standards in the pig industry by Red Tractor⁸, noted that this development might be seen as a measure of delivery against the UKFAR recommendations.

We are aware that a number of meetings have been held since January to help develop responses to recommendations across organisations, or within certain industry sectors. The AHDB has been particularly involved in this work. These efforts to coordinate actions are to be welcomed, particularly where responses to the recommendations are likely to be complex in nature and require collaboration within the industry to bring about effective change.

That coordination needs to extend to Government departments and their regulatory agencies. In July, for example, it was reported⁹ that the Environment Agency planned a 50% increase in farm inspections, to provide farmers with more advice and support to meet environmental standards, particularly with regard to water quality. How this will relate, in practice, to the more general farm assurance system to avoid duplication of effort is, as yet, unclear.

More recently, other schemes have noted how their strategies have been, or are being, aligned with the UKFAR recommendations. These include, for example, the recently updated strategy of the NI Beef and Lamb Farm Quality Assurance Scheme¹⁰. Further statements have been released demonstrating that the Review's recommendations have been the subject of discussion to help prompt change in the approach to farm assurance. Notable amongst these is the statement by the NFU Combinable Crops Board in June¹¹.

To assist this process, the AHDB announced in August that a research programme had been launched to inform future cereals and oilseeds work on farm assurance and standards for imported combinable crops. It is expected that the results of this research will be published in phases between January 2026 and October 2026¹².

Whilst largely statements of intent, the responses noted above, and in other reports, demonstrate that there is willingness in many parts of the farm assurance landscape, to address the issues identified in the UKFAR to deliver change in the farm assurance system. The following section identifies where those changes are taking place and the overall progress being made, to date, against the UKFAR

⁵ 'Red Tractor pledges major reform after farmer backlash', Farmers Weekly, 25 March 2025

⁶ 'NFU outlines next steps on delivering change to farm assurance', NFU Online, 15 April 2025

⁷ 'The AHDB pledges to make changes following farm assurance review', The Scottish Farmer, 9 April 2025

 $^{^{8}}$ 'Red Tractor: New tiered approach to pig welfare standards and labelling gets go-ahead', The Grocer, 23 July 2025

⁹ Fresh Produce Journal, via fruitnet.com, accessed 10 July 2025

¹⁰ 'LMC launches strategy to simplify quality assurance scheme', Meat Management Magazine, 6 October 2025

¹¹ 'Crops Board sets out clear direction to shake up farm assurance', NFU Online, 25 June 2025

¹² 'The AHDB commissions new research to support future discussions about farm assurance in the Cereals and Oilseeds sector', AHDB, 18 August 2025

recommendations. It will also identify where progress is lacking, or has not yet been reported to us, in the hope that this can be rectified by the time of the second Monitoring Report Spring 2026.

5.2 Key Areas of Progress

Strategic Recommendation 1: On-farm audits must be reduced, simplified and delivered more consistently.

Recommendation 1.01: Clarity about purpose (page 87 of the original UKFAR report)

The purpose and scope of farm assurance must be clarified and reset, based on the good practice statement set out in this report. Agreement should be sought from bodies across the food supply chain on this restatement so that there is a clear understanding of the need for, and objectives of, a high-quality UK farm assurance system.

Action: NFUs and the AHDB to lead

Timescale: 6 months

As a reminder, the range of responses/options to reply were as follows:

- 1. Already compliant
- 2. Imminently compliant
- 3. Compliant in the future, but missed the deadline
- 4. Will not be compliant, but have made different changes
- 5. Will not be compliant and do not plan to make any changes
- 6. No rating provided with the narrative comments
- 7. No response

	1	2	3	4	5	6	7
AHDB		Х					
NFU		Х					

The **AHDB** has worked collaboratively with the **NFU** to develop a purpose and scope restatement following feedback from farm assurance schemes at a first FAR roundtable meeting in late May. The AHDB has incorporated farm assurance value propositions into the paper, which has now been circulated to the schemes for comment and was planned to be discussed at a second roundtable in September.

Farm assurance schemes will be invited to communicate their own scope and values in a common format with a view to joint publication as a single document later in 2025.

Recommendation 1.02: Revising Standards - focusing only on what is necessary (page 87)

There is an urgent need to remove or reduce the complexity of existing standards. Each farm assurance scheme must undertake a deep dive of existing standards to provide a publicly available plan setting out which, in due course, will be removed, replaced or improved.

Each scheme must, thereafter, report publicly on the rationale for keeping or removing a standard, be that, for example, added value or due diligence delivered. Each new standard introduced to a scheme must have a publicly identified sponsor/sponsors to provide greater transparency on the catalyst for its inclusion.

This work will provide the basis for applicable UKAS scheme reviews, which we recognise take place on a longer cycle, but will enable time to be provided for improved communication with the farming industry on the steps to standards simplification being pursued by farm assurance schemes.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G			Х				
SQC			Х				
QMS	Х						
Red Tractor	Х						
RSPCA				Х			
WLBP				Х			
Soil Association	Х						
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC						Х	

SQC reviewed its standard setting process and committee in 2022 and undertook a further review in 2024. It has a detailed process and flowchart/list of committee members available on its website. SQC standards are reviewed annually in line with the scheme year and it is currently in the process of undertaking a full review of its standards document, looking at each requirement to check they are still relevant, fit for purpose and required. It has engaged with **NFUS** to inform them of the Review and will later engage in full consultation with them.

QMS believes it is already largely compliant on this recommendation, following its governance review in 2022. It has adopted the recommendation from the UKFAR that each standard has a sponsor and a seconder and this information is publicly available.

Red Tractor noted that it recognises the importance of this recommendation and has started work in this area in consultation with sector boards and key stakeholders to develop and finalise a policy for standards. The policy will initiate a review of and justification for existing standards, and identify future changes as required. Progress against the review plan will be monitored and published every 6 months.

The **RSPCA** reported that its science team, which develops its standards, has improved its communications around the rationale for standards in recent years. There is now a justification document available alongside the standards, which details its evidence-based approach to standards development.

WLBP reported that it would be premature for it to consider revising its scheme standards and operational processes, when a major consultation and review is being undertaken in Wales on the future agriculture policy, alongside key regulatory changes and reviews such as the water quality regulations. This has been agreed at WLBP board level and shared with UKAS to inform them of the position. WLBP believes that it is not only the standards that will need to be reviewed in the future, but also the delivery mechanism of operating assurance.

The **BEIC** response noted that the Lion Quality scheme has its own unique way in which to meet this recommendation. The Lion Code (Version 8) was published in June 2023 and came into force on 1st September 2023, thereby allowing 3 months lead-in time. Its publication followed significant consultation with the egg sector through BEIC governance and communication structures. The Lion Code Technical Committee meets regularly and ensures that the sector is fully engaged in setting, implementing and reviewing the standards in place.

This provides an appropriate level of continuous feedback, involving the whole supply chain, that allows standards to improve. The recent formation of a working group of the BEIC Technical Committee to delve into each standard further has enabled a greater focus on the detail within each standard and the rationale for inclusion. The recommendations in the UKFAR report suggests a public statement is made on the purpose of each standard with a publicly available plan for review. Given the nature of BEIC

governance procedures, the fact that the whole industry regularly discusses the standards, and proposes and approves amendments to the standards, it does not see the necessity to make public statements outside the current communication methodologies.

Recommendation 1.03: Right of Appeal (page 88)

There must be recourse for farm businesses to refer an audit outcome to an independent arbitrator, outside the farm assurance scheme, who is capable of making binding decisions, in instances where that outcome could restrict market access (for example in the dairy sector).

Each farm assurance scheme must publicly restate its approach to having a transparent complaints and appeals procedure that takes account of the need for external arbitration. Unless non-compliance relates to an issue of food safety, or some other serious breach of standards, it should not result in immediate suspension of market access. Each farm assurance scheme must also publicly restate the timescales within which an appeal process will be completed.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G	Х						
SQC	Х						
QMS	Х						
Red Tractor	Х						
RSPCA			Х				
WLBP	Х						
Soil Association	Х						
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC						Х	

The Global GAP complaints department answers and investigates all complaints without bias.

WBLP considers that appeals procedures covered by its governing boards work well, but are dependent on the board make up and quality. In its opinion, some certification bodies (CBs) are better than others at handling appeals. Its complaints and appeals procedure is available online to all members if they feel that they would like to appeal a decision on their certification.

SQC undertook a full review of its complaints and appeals process in 2022. It consulted widely with industry and farmers throughout the process and promoted the documents and timescales fully. These are available on the SQC website for transparency and are reviewed on an annual basis to ensure they remain fit for purpose.

QMS noted that they are compliant in this regard, but that this action is not solely at the discretion of the scheme owners. Certification decisions can only be made by certification bodies and, to comply with UKAS, cannot have outside interference from scheme owners. In 2023, QMS introduced its first set of membership rules, and as part of that introduced an independent appeal panel.

Red Tractor has a complaints and appeals process, which specifies that the panel must include at least one person independent of Red Tractor. It is also considering steps to strengthen this process in line with the UKFAR recommendation, noting also that this process will be reviewed every 2 years.

As part of the **RSPCA's** 5 key strategic aims, it is reviewing investigations, sanctions and appeal processes. This work was due to be completed in September 2025. Areas of focus include improvements in communications with members, transparency of the processes, shortening the lead time for conclusion of investigations, a third party making the decision on the sanction (once the investigation is complete) and a third-party appeal function.

The **BEIC** noted that the Lion Quality scheme has its own way to meet this recommendation. Third party independent audits are undertaken by NSF, operating to ISO17065. The Lion Code of Practice requires producers to be registered to a packer, in order to maintain food safety protocols and full traceability of eggs, hens and feed. Packers complete self-audits of producers every 6 months, whilst the NSF audit takes place independently of the 6-monthly self-audits, every 18 months, unless issues have been identified. Audit appeals and feedback are therefore received from subscribers on behalf of their registered producers and an internal process is followed to arbitrate on the issue. If required, which it rarely is, the issue is presented to either the Technical Committee or the Subscribers, as a whole, to make the decision on how to proceed. There is no need for external arbitration.

Recommendation 1.04: Proportionate sanctions (page 88)

Each farm assurance scheme must revisit the sanctions imposed for non-compliance to ensure that they are proportionate and do not unduly impact upon the viability of a farming business. To this end, standards should continue to be graded, but schemes must work together to ensure that there is greater consistency between their standards, grading and any sanctions imposed for non-compliance.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G					Х		
SQC	Х						
QMS	Х						
Red Tractor	Х						
RSPCA			Х				
WLBP	Х						
Soil Association	Х						
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC	Х						

Global Gap noted that many farm assurance schemes are benchmarked against it, and there are regular discussions that take place for alignment.

Organic Farmers and Growers (OF&G) commented on the risks that can occur on certain farms, where suspension can lead to the farm going out of business.

WLBP already applies a graded regime to non-compliances and believe that its sanctions are fair and appropriate.

SQC was required to review all sanctions for non-compliances in 2023. It has not been questioned by the industry on any sanctions imposed and believes that it is already compliant in this area.

QMS has implemented a new membership rule and appeals framework to deal with issues concerning the reputation of the scheme, or where a membership rule that is breached. This was designed to objectively assess membership rule breaches and ensure a consistent approach is taken to any membership sanction.

While **Red Tractor** already has a process to ensure that sanctions are appropriate, it reported that the UKFAR has demonstrated that these sanctions are not sufficiently transparent or publicly available. Therefore, the scheme made plans to communicate and publish its sanctions by May 2025. Also, following discussions with other farm assurance schemes, it has committed to review all sanctions in consultation with sector boards to ensure that they are consistent.

The **Soil Association** believes that this role is the responsibility of the certification scheme. For the organic sector, there is cooperation between certification bodies and DEFRA, with oversight from UKAS, that results in an appropriate and proportionate sanctions regime.

The **BEIC** noted that sanctions within the Lion Code of Practice are clear and transparent and have been set by the industry, for the industry. They are regularly reviewed and discussed in BEIC governance forums and changes made when appropriate.

SEDEX noted that **SMETA** is grounded in the principle of continuous improvement, providing a practical and realistic approach for businesses to address both risks and actual impacts to workers, and to work towards increasingly higher standards. It does not, therefore, mandate consequences for businesses. Rather, the purpose of SMETA is primarily to enable recognition and resolution of concerns, encouraging both suppliers and their customers to take a continuous improvement approach, be transparent with each other and to collaborate to resolve issues identified through SMETA audits. Therefore, recommendations with regard to sanctions, and processes to appeal against sanctions, are seen as not relevant to the scheme.

Recommendation 1.05: Risk based, coordinated inspection (page 88)

Each farm assurance scheme must adopt a risk-based approach to audit visits, based on previous audit outcomes, so that the timing of visits, and their content, can be adjusted to enable more focussed audits to be undertaken, possibly over a longer period between visits where this is permissible under the accreditation arrangements pertaining to the scheme. The risk assessment must be clearly communicated to the farm business so that it is aware of the timescales and areas of focus that will form the basis of future audit visits. Prior to a farm audit, the certification body must continue, as currently expected, to contact the farmer to set out an audit plan on how the process will work, and offer the opportunity for the farmer to ask questions, or raise any concerns.

However, this should, henceforth, be conducted as a supportive contact, to reduce the stress associated with an audit. It should also be a mechanism by which advice about the audit process can be offered on a non-prejudicial basis. If an auditor is unable to conduct their audit in accordance with the timing in the agreed audit plan, they must set out their reasons for not complying with this requirement and provide a written statement to this effect to the farmer.

If the farmer does not agree that the time taken for the audit was compliant with the audit plan, through no fault of their own, the farm assurance scheme must review the matter to ensure that the auditor's work is being conducted as effectively and efficiently as possible and inform the farmer of the outcome of its review.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G			Х				
SQC	Х						

QMS			Х		
Red Tractor	Х				
RSPCA		Х			
WLBP	Х				
Soil Association	Х				
LMC NI				Х	
SEDEX				Х	
LEAF				Х	
BEIC	Х				

Global GAP reported that it is already compliant, as it is a risk and outcome-based audit.

OF&G noted a potential complication that is hard to address, as farmers can switch certification bodies, if they are to be suspended from one.

SQC operates a product certification model that requires all assured growers to be assessed once each scheme year. This was introduced in 2024. In that year, they also replaced its "spot check" programme with a new "integrity check and risk programme". This means it can be more dynamic in responding to changes in market and supply chain requirements, whilst continuing to protect the integrity of the SQC assurance scheme.

QMS already has a risk-based approach for its pig scheme and processor scheme, however further discussions with other devolved nation beef and sheep schemes are still needed. This is to ensure there is a consistent framework that is also permissible by UKAS. As an interim measure, QMS is undertaking an exercise to review its QA contract specification and audit timing, with a view to incorporating changes to its QA tender. It is planned that this will go live in April 2026.

Red Tractor already operates a risk-based approach to audits in pigs, poultry and dairy, however a risk-based approach acknowledging low risk farms has not yet been developed or implemented.

The **BEIC** reported that independent audits by NSF within the Lion Code of Practice are already risk based. Independent audit reports are made available to all involved - producers and their associated packer - and queries/discrepancies/issues are followed up swiftly by all involved.

LMCNI noted that the concept of risk-based inspections was recently addressed during its review of the NIBLFQAS Strategic Plan 2025-2028. Although this is a mechanism to reduce audit burden, feedback from farming representatives was that it was not the correct way to achieve this at the present time. It was agreed that the 18-month inspection cycle with 5% spot checks works well. There was also discussion around the challenges from both the farmer perspective and from a Northern Ireland Beef & Lamb Farm Quality Assurance Scheme (NIBLFQAS) resource perspective, particularly around communications, perception of risk-based farms and IT investment required. The NIBLFQAS Industry Board fully supports the aim to reduce audit burden, however, the concept of risk-based inspections is not a high priority mechanism. There is a need to continue to manage risk but not necessarily through changing the quantity or frequency of inspection.

Recommendation 1.06: Learning lessons: using experience to support members (page 89)

Whilst recognising the nature of audit requirements, farm assurance schemes must establish processes to make the lessons learned from audit visits available to their membership in an anonymised form, so that best practice, and the means to develop that practice, can be shared across the scheme. This should recognise the role that farm assurance plays in helping to maintain and improve standards across the farming industry and auditors should be tasked with the requirement to identify best practice to feed into these processes.

Action: Farm Assurance Schemes

Timescale: 9 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G			Х				
SQC	Х						
QMS	Х						
Red Tractor	Х						
RSPCA			Х				
WLBP	Х						
Soil Association	Х						
LMC NI						X	
SEDEX						Х	
LEAF						Х	
BEIC	Х						

OF&G noted that the audit system is flawed, with an unfairness in experience and many auditors lacking necessary people skills.

SQC reported that it works on an ongoing basis with its CB to identify areas where they can assist assured growers to reduce their audit burden. It produces e-newsletters which highlight areas of best practice, and, where necessary, works to produce technical guidance (e.g. template documents which farmers can use to maintain standards). It has also introduced twice yearly non-compliance reports, noting the top 10 non-compliances and, where possible, providing assured growers with guidance to help improve practice. In addition, part of the purpose of its assessor's consultation group is to discuss best practices so that these can be addressed and built on in the future. It also recognises that lessons could be learned from other schemes and accepts that more could be done to share best practice.

QMS, alongside its CB, has developed a template for assessor calibration days which is used as a 2-way communication forum between assessors, the CB and standard owners. These workshops are held regionally to ensure local farming needs and conditions are taken into consideration and have also had some input from other regional stakeholders. This allows farmer representatives to provide feedback from members, whilst also hearing directly from assessors, to help bridge knowledge gaps and build positive relationships.

Red Tractor noted that it agrees that there is an opportunity to improve the value provided by audit information. It will consult with farming representatives on sector boards, other external support organisations and auditors to review how such information can be shared widely across the membership and industry. The aim was to pilot this in the dairy sector by September 2025. It also already publishes compliance advice based on the most common non-conformances for members across all of its sectors.

RSPCA reported that improvements in the collection and how best to use the data they collect are part of the strategic goals that they are currently working towards.

WLBP shares experiences of compliance with different industry and government stakeholders. Many statutory and voluntary elements of its standards and compliance are provided with training, support and guidance through wider funding schemes that are available in Wales (e.g. Farming Connect and LANTRA). Other examples include the work on which WLBP collaborates with Arwain DGC, a project looking at various ways of reducing the use of antimicrobials in sheep and cattle.

Feedback from the **Soil Association** inspection team is part of regular technical meetings between the certification bodies and the standard owners. This is reflected in comprehensive guidance that accompanies the standards. Training, newsletters, and magazine articles are used to showcase and highlight best practice.

The **BEIC** noted that there is a continuous improvement process involved in their governance structures that enables subscribers to learn lessons to pass on to their respective registered sites.

SEDEX noted that it was created to reduce assessment duplication and associated burdens. By operating an audit that is recognised by business customers in multiple regions and sectors, SEDEX and **SMETA** reduce the number of separate social audits required at an individual supply chain site such as a farm. It is already the case that neither SEDEX nor the SMETA methodology mandate an audit cadence. The frequency of audits is determined by buying and supplier companies, based on multiple factors – including (but not limited to) previous audit findings, inherent risk and businesses' self-reported information and business priorities.

Therefore, recommendations about deciding audit or inspection cadence are not seen as relevant to SEDEX/SMETA. Where viable and appropriate, SEDEX will support conversations between buying organisations to encourage an aligned approach to auditing cadence. SMETA audit reports are shared with all customers of a site on the SEDEX Platform, reducing the likelihood of multiple audits being requested.

The SEDEX Platform also integrates multiple data sources to build a clear view of risk likelihood for individual worksites, further helping its members prioritise how regularly different sites are audited. The SEDEX Platform also enables UK farmers and other supply-side businesses around the world to upload various pieces of information once and share this with multiple customers simultaneously, from specific audit reports to basic site information about workers, policies and processes.

Minimising duplication and assessment burdens for supplier businesses remain at the heart of SEDEX priorities whenever it reviews and evolve its tools. For example, recent updates have streamlined the user experience to make it easier and faster to complete for all suppliers, including UK farmers.

SMETA is designed to assess risks to workers and compliance with labour rights as outlined in local legislation and the International Labour Organization's Fundamental Conventions. It does not believe there to be significant duplication between SMETA audits and those of other providers within the Review. However, it welcomes opportunities to continue engaging with UK farmers, UK farm assurance schemes and mutual members through this Review to understand any areas where alignment might be possible and appropriate. SEDEX will continue to support and engage with the UK farm assurance schemes and any group network or federation as appropriate, for example to share learnings and identify solutions to challenges raised, while recognising that SMETA is not a farm-specific scheme.

Recommendation 1.07: Working in tandem: collaboration and cooperation between schemes (page 89)

Additional work is required to secure collaboration and cooperation between farm assurance schemes to allow for multiple scheme audits to be conducted at the same time, reduce duplication and encourage "earned recognition" between schemes, with the aim of reducing the time required from farm businesses in preparing for, and participating in, their audits. In due course, there must be a common scale of standards (or at least a "read across" between scheme standards) - with minimum standards and additional requirements related to customer requirements, only where they are strictly necessary to obtain particular or specialist market access.

Action: Farm Assurance Schemes, led by the AHDB

Timescale: 9 -12 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G					Х		
SQC		Х					
QMS	Х						
Red Tractor		Х					
RSPCA					Х		

WLBP	Х					
Soil Association				Х		
LMC NI					Х	
SEDEX					Х	
LEAF					Х	
AHDB			Х			
BEIC		X				

OF&G believes there are too many stakeholders working across different rules for this collaboration to work with ease.

SQC feedback suggests that not all schemes cover multiple crops and access to data between competing businesses may result in GDPR type issues. Similarly, compliance with standards may vary between sectors (i.e. potentially a lower level of compliance for livestock farming businesses in relation to use of Plant Protection Products (PPPs) than a farming business which is more focused on crops). It believes that the scheme standard is a point of difference expected by buyers. As a co-operative, SQC is proactive at collaborating to seek audit efficiencies where possible.

Over 50% of SQC members are members of other schemes assessed by SQC's certification body, which helps reduce the audit burden and cost (e.g. joint assessments are carried out across SQC and QMS). SQC undertakes regular gap analysis with other schemes to achieve recognition where possible and SQC's certification body also facilitates a wider stakeholder group to investigate greater earned recognition with a wider audience, including regulatory bodies. The sharing of risk data will be key to this. SQC is keen to support members' understanding of how this can be achieved.

On a large proportion of farms where **Red Tractor** and other farm assurance scheme audits are required by the member, it was reported that they are already conducted at the same time. This is delivered through its work with CB's, who also assess for many other farm assurance (FA) schemes. It is believed that this could still be improved, but separate audits in some devolved regions and between the scheme and RSPCA audits would be exceptions.

Red Tractor has started progress on this recommendation by writing to all other farm assurance schemes to suggest a collaboration on this important area and to seek areas to improve. In some sectors, considerable additional audit burden is created by separate processor and customer audits, which the scheme has identified as a significant area not covered in enough detail in the original UKFAR report. It plans to write to all retailers to urge them to work together with the scheme to address the issue. Red Tractor representatives participated in the NFU/AHDB hosted meeting at the end of May 2025, where the topic was discussed, though other schemes felt this was for the certification bodies to action.

The **RSPCA** Assured standard is seen as a standalone scheme. However, looking at duplication across other schemes standards and legal requirements, it believes this is a consideration for future standards development.

The opportunity for better cooperation between schemes has already been available to **WLBP** members in Wales. This is the offer of a dual Red Tractor dairy assurance visit, in conjunction with a Farm Assured Welsh Livestock Scheme (**FAWL**) scheme visit. Although generally this works, it is believed it could be improved by the certification bodies conducting the assessments ensuring that they have enough trained staff to deliver a dual assessment.

Certification to other schemes is offered by **Soil Association** certification. The scheme noted that it is always willing to discuss "earned recognition" with other schemes, including supplier schemes and regulators such as the EA. However, it feels it is not in a strong enough position to leverage these discussions.

The **AHDB** noted that farm assurance schemes are trying to increase the ability of CBs to carry out multiple audits, although some schemes want to keep their audit separate as part of their basis for building value. The proposed "federation of farm assurance schemes" has the potential to facilitate

enhanced coordination and collaboration between schemes. Following the UKFAR roundtable in May, the AHDB agreed an action to consult further with farm assurance schemes on a bilateral basis and identify sources of audit burden (e.g. duplication between assurance and retailer schemes) before working with the NFU to raise identified issues with retailers and others.

The **BEIC** is engaging in the cross-industry collaboration, but believed it unlikely that the recommendation will be met. Each assurance scheme is very different, with differing aims and objectives. Often schemes are perceived as being in competition with each other. The BEIC believes that they should strive to reduce duplication and encourage earned recognition between schemes, but this is a far more challenging piece of work than the 9-month deadline would suggest. It should be left for individual schemes to identify opportunities to achieve this recommendation, whilst not impacting on their independence in standard setting.

SEDEX remains committed to improving its consultation and collaboration with UK farmers and welcomes their feedback. It has published a commitment that any substantial updates to the **SMETA** methodology will be subject to a public consultation of a minimum of 60 days, to ensure that UK farmers have ample opportunity to input into methodology decisions. Recent consultation was highly influenced by UK farmers. The results of the consultation and the decisions SEDEX made have been transparently reported on the SEDEX website and are highly aligned to the feedback received from the farming community in the UK. SEDEX continues to encourage UK farmer members to participate in its community events, training, consultation and feedback opportunities.

Recommendation 1.08: Joint training for inspectors (page 89)

Farm assurance schemes must revisit their induction and training programmes for both new and existing auditors, to create and publish a common "framework" that is mandatory for all scheme auditors to follow, to address the simplified assurance structure sought in this report.

There must be a renewed focus on training to develop interpersonal skills amongst the audit community to better understand and improve communication and relationships between the audit process and the farm business. To this end, farm assurance schemes should engage with The Institute for Agriculture and Horticulture (TIAH) to capture and recognise the completion of continuing professional development of farm assurance auditors and for TIAH to help signpost farm assurance schemes, and their auditors, to appropriate training providers. Farm assurance schemes must publish data on auditor training and completion on an annual basis.

Action: Farm Assurance Schemes, working with TIAH

Timescale: 9 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G			Х				
SQC				Х			
QMS				Х			
Red Tractor		Х					
RSPCA				Х			
WLBP	Х						
Soil Association					Х		
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
TIAH				Х			
BEIC			Х				

Feedback from **OF&G** suggested that there is a need for one independent CB with its own training and ongoing assessment, not for profit and with any surplus resource and funding going back to the industry.

SQC contracts the services of an ISO accredited CB with a specific protocol that stipulates SQC's expectation of auditor competency and training. There is also a requirement to demonstrate auditor competency, training and ongoing CPD.

This is an exclusive agreement between SQC and its CB required to provide evidence of its contractual requirements to UKAS annually. It was suggested that it would only add additional burden to SQC and its CB, if another layer of auditor validation was required that conflicts with the UKAS need. SQC reported that making it mandatory to use TIAH, would also undermine the point of difference that allows for choice when scheme owners are selecting an appropriate and proactive certification body.

Red Tractor noted that it is committed to a programme of CPD for auditors delivering its audits, and, to deliver this, that it has a dedicated Assessor Training Academy and internal staff resource in its Compliance Team. It will review the current training provision to ensure it delivers the required framework and training around communications and interpersonal skills. Red Tractor is already a member of the TIAH Consultation Group and wrote to TIAH in March reconfirming its commitment to the work TIAH is doing and asking for suggested appropriate training providers. Statistics on the scheme's assessor training programme were expected to be published annually, starting in September 2025.

RSPCA noted that this is not something it currently has in its plans, but would be something it would consider thinking about in the future.

WLBP noted that it believes it is already compliant on this matter and does not intend to make any further changes. It noted that it has empathetic assessors, who are often also farming themselves. The scheme holds quarterly assessor hubs to discuss their approach on farm as well as wider industry issues to ensure assessors are up to date.

The **Soil Association** commented that auditor competence is already covered by UKAS and DEFRA oversight of the organic sector.

TIAH has discussed this recommendation with the management of one of the farm assurance scheme owners. Their position is that as the scheme auditors are not employed directly by them, training of auditors is not its responsibility. It is therefore proposed by TIAH that this recommendation is extended to the companies that are contracted to deliver the audit services on behalf of the farm assurance scheme owners. TIAH remains supportive of this recommendation, but there must be more "buy in" from the farm assurance scheme owners.

The **BEIC** works with NSF, as its as independent auditors, to identify and enhance auditor training processes. It is unlikely it will publish a report publicly on this area, but the matter will be discussed within its governance structures. It was noted that auditors are hard to come by, and the creation of joint training and standards is potentially dangerous for the sector and auditor availability and that it should be for individual farm assurance schemes to set their own requirements.

Recommendation 1.09: Transparency between schemes and regulators (page 90)

Farm assurance schemes must instigate a training programme/awareness raising exercise with farming industry regulators to better explain the purpose and scope of good practice farm assurance, and to help improve understanding of the respective roles of farm assurance versus regulatory requirements.

Ideally, this process should be coordinated between the farm assurance schemes, though it is recognised that it will need to take account of the devolved nature of certain regulators and the schemes most relevant to their respective territories. This exercise must be repeated on a routine basis (we recommend once every two years) to ensure that the exchange of information is up to date. Account must also be taken of the regulatory review being undertaken by DEFRA to ensure the efficiency and effectiveness of its regulatory landscape.

Each year, under each farm assurance scheme, auditors should come together alongside key stakeholders to walk through mock inspections to improve two-way dialogue and learning. We are aware this happens under QMS/SQC schemes and strongly encourage all farm assurance schemes to adopt such an approach.

Action: Farm Assurance Schemes and industry regulators

Timescale: 12 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G	X						
SQC		Х					
QMS	X						
Red Tractor		Х					
RSPCA				Х			
WLBP	Х						
Soil Association	X						
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC	Х						
Natural Resources Wales						Х	
FSA	Х						
Welsh Government						Х	

OF&G expressed the view that whilst UKAS ensures that schemes are transparent, there is still too much repetition and duplication between schemes and other authorities.

SQC's certification body already brings key stakeholders alongside its auditors to undertake a mock assessment each year. In addition, each of the SQC Directors are encouraged to attend a walk though mock assessment when they join the SQC Board – and to share this knowledge with their respective organisation (i.e. a SQC co-op member). SQC holds regular meetings with industry regulators and the Scottish Crops Supply Chain Hub throughout the year to discuss the SQC scheme.

QMS also conducts mock assessments. However, it believes that there is still a wider conversation needed concerning the risks of voluntary QA schemes being too closely entwined with regulation. Alternative approaches, such as centralised data sharing to reduce assessments by regulators, may yield a similar outcome, without the risks involved in combined assessments.

Red Tractor recognises that transparency with regulators could deliver benefits to all parties (i.e. members, FA schemes, and regulators themselves). It has started progress against this recommendation by writing to all other farm assurance schemes to ascertain the potential to collaborate on knowledge exchange initiatives with regulators. Red Tractor will also produce videos showing elements of a farm inspection for sharing with the FSA and other regulators to improve transparency.

WLBP has consistently done this since its inception, but an issue remains about government and non-government agencies, not implementing the recognition appropriately. Greater support from non-assurance scheme owners for recognition would be useful to bolster the principle.

The **Soil Association** already has a close working relationship with the DEFRA organic team. However, it agrees that a more joined up approach to regulation within DEFRA is desirable. It feels it is not in a strong position to leverage this change, but would support any future initiatives.

The **BEIC** is in regular communication with DEFRA, the Animal and Plant Health Agency (APHA), other government bodies, including the devolved administrations, about the Lion scheme, regulations and the vital role it plays in the sector.

Natural Resource Wales (NRW) reported that its inspections and enforcement must meet the requirements of the regulators code, the regulatory principles and enforcement and sanctions policy all of which are publicly available. NRW would welcome the opportunity to understand how farm assurance scheme assessments are conducted and non-compliances managed. NRW has a long-standing relationship with FAWL, with regular meetings, and has provided training for assessors. It would welcome the opportunity to develop similar engagement with other farm assurance schemes operating in Wales.

Since the publication of the UKFAR report, **the Food Standards Agency (FSA)** has initiated an extensive series of training sessions to raise awareness and help improve understanding of the respective roles of farm assurance versus regulatory requirements. It has reviewed several training videos that were made by RT to promote awareness of RT schemes and assessments which can be disseminated to enforcement authorities. It has also organised the following engagement events in collaboration with RT, the AIC and the National Agriculture Panel (NAP):

- a Wales and England engagement day with teams across the FSA at a college farm in Preston in May. The day involved exploring how the RT schemes work in practice, its governance structures, member onboarding process, scheme sanctions, and its role in providing assurance
- a NAP face to face meeting in London on 10 June with regional lead feed representatives across
 the UK. The FSA hosted an "earned recognition" session and co-presented with the RT and the
 Chair of the National Agricultural Panel to deliver insights from different regulatory and assurance
 perspectives. Further engagement with officers is planned for the autumn to follow on this session
- an AIC training and engagement session for LA feed officers and representatives from across England and Wales at an animal feed manufacturing site in Oswestry in Shropshire. The session which took place in June, involved presentations from the AIC and its CB. The session focussed on key areas, such as governance structures and how standards are developed, how scheme assessments are conducted and how non-conformances are dealt with
- an internal FSA and AIC awareness day at Noble Foods feed manufacturing site in Middlesborough, with an opportunity to walk through a typical scheme assessment and learn how assurance is provided through a third-party certification body, KIWA
- a cross government engagement day with FSA directors for Strategy and Regulatory Compliance, the Veterinary Medicines Directorate and DEFRA at AB Agri Limited at Bury St Edmunds in July. The government departments met with the AIC and industry to discuss their approach to earned recognition. Presentations from AIC and the FSA touched on current issues impacting on wider assurance and regulatory landscapes, such as ensuring that standards for imported food are equivalent to those of UK farm assurance schemes
- The FSA Chair (Professor Susan Jebb) welcomed Parliamentarians and a range of stakeholders from across the food sector to a reception at the House of Commons in July. The event was organised to mark the 25th anniversary of the establishment of the FSA, and the publication of its latest annual report on food standards. The FSA regularly engages with assurance schemes and their members at public events and shows such as the Royal Welsh Show and the Balmoral Show throughout the year
- the National Food Crime Unit (NFCU) presented to staff who assess members of the FAWL scheme in April by attending assessor hubs. It also provided written material for the WLBP newsletter
- an animal feed delivery day for local authority lead feed officers in Wales is planned for September.
 This will cover how those premises awarded earned recognition impact on the LA inspection frequency, the circumstances for the removal of earned recognition, the role of assurance schemes and the exception reporting procedure

a themed session on animal feed is being developed for October for the FSA's Welsh Food Advisory
Committee. This will include a visit to an animal feed mill. The session will be jointly presented by
AIC and the FSA to provide an overview of animal feed delivery and the role of assurance schemes

A full review of the scheme standards within **AIC** and **Red Tractor** commenced in June and is on track for completion by the end of the autumn. This will ensure that FSA "legislative mapping" aligns scheme standards with relevant regulatory requirements. A similar exercise is planned for schemes in Wales and Northen Ireland. Red Tractor has committed to streamlining assessments and reducing audit burden for farmers and growers. The FSA has been clear that as it identifies and delivers improvements, a common consensus that standards will continue to reflect regulatory requirements is essential. The FSA noted that it looks forward to having an active role in agreeing any proposed changes to standards and collaborating to ensure standards continue to be robust and provide assurance against regulatory outcomes.

The Welsh Government reported no contribution or update to this recommendation at this stage.

Recommendation 1.10: Addressing the impact of audit on farmer wellbeing (page 90)

We were told about the pressure placed on some farmers by participation in farm assurance schemes, and of the impact on their level of stress and mental health. We are also aware of the wide variety of farms undergoing schemes audits, and the fact that farming is an industry where there are reported to be high levels of neurodiversity.

There is a need for auditors to be aware of these factors and to be able to take them into account in their auditing approach. As a result, farm assurance schemes must pay particular attention to audit style and approach in their auditor training programmes. Training and support are available on mental health awareness from, for example, FCN, RABI, RSABI and Rural Support and we encourage farm assurance schemes to engage proactively with these charities and support mechanisms.

Action: Farm Assurance Schemes and relevant farming support organisations

Timescale: 9 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G	Х						
SQC	Х						
QMS	Х						
Red Tractor	Х						
RSPCA	Х						
WLBP	Х						
Soil Association			Х				
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC	Х						
EA						Х	
RSABI	Х						
RABI	X						

Global GAP noted that soft skills are included in its training. The integrity of the programme is included in a check, when it is auditing certification bodies.

OF&G felt that auditor training and recruitment is very important, as every audit can require a different style.

SQC noted that it is very aware of the challenges facing the agricultural sector and how these can impact on an individual farmer's level of stress and mental health. Its certification body has piloted mental health and first aid workshops with RSABI, which led to a wider roll out of the training, with every assessor, CB staff member and the SQC Managing Director attending this training. This relationship is being maintained with wider support from NFUS, with both NFUS and RSABI representatives being present at certification body assessor training.

SQC also felt that one of the key challenges is the need to adhere to accreditation (ISO IEC 17065) requirements, with only assessments conducted by the assessor, but if there were changes to the accreditation requirement then a more supportive relationship could be cultivated. However, the integrity of the SQC scheme relies on impartiality, which may be compromised should an assessor become over familiar with a site/member. The SQC CB offers to change assessors at the member's request (where feasible) to ensure a constructive assessment environment can be created. SQC asked that mental health challenges for assessors also be considered, as they can equally be challenged when those being assessed choose to engage in an aggressive or disruptive manner. They also raised the point that not all farmers want change or an increase in the use of technology, so it is important to consider this impact on some members of the farming community.

QMS paid for FIA assessors to attend RSABI Mental Health First Aid training. Whilst this was not mandatory, uptake was high. This is something it said it will continue to offer and embed as part of the approach to improving the assessment experience.

Red Tractor also noted that it recognised the huge challenges facing the farming community and the pressure placed on some farmers and is fully committed to ensuring its staff, and auditors working on its behalf, are appropriately trained. In addition, it believed that work in streamlining audits and implementing a risk-based approach had the potential to improve their impact. By July 2025, Red Tractor had nominated a director to take responsibility for overseeing this work and to identify where improvements could be made. RT staff, who liaise with members on a regular basis, have attended RABI mental health training and RT direct communications with individual members, particularly when sanctions are being applied, are to be introduced.

The **RSPCA** stated that understanding the impact of their audits on its members is something that is taken very seriously. Alongside any usual training programmes undertaken annually, there are workshops held with all assessors specifically focussing on refreshing emotional intelligence and building an empathetic approach to farm visits. It had invested in an external trainer for this session, specifically because it recognised that while audits are a condition of certification, there may be many other factors affecting the mental health of members. In recent years, it has also introduced mental health first aiders into RSPCA Assured (i.e. individuals who may provide colleagues with support and guidance). Its assessors are also well versed in signposting members to support organisations, like the FCN.

WLBP is fully engaged in this type of work and noted that it was one of the first schemes to engage in mental health training for assessors, certification officers and administrators.

The **Soil Association** also believes that these issues are covered by organisation wide policies and practices. Auditor skills are constantly updated and take account of these issues.

The **BEIC** recognises and understands the concern, but are not aware of any issues within their scheme. A support network is available to producers, via their respective packer, or from contact directly with the BEIC. The feedback loop from packers, producers and other registered sites into its governance structures that include NSF as their independent auditors, means that if there are any issues they are addressed swiftly.

The **Environment Agency** reported that it has produced a video to demystify the inspection process and help reduce farmer anxiety.

RSABI has provided free mental health first aid training to quality assurance assessors in Scotland, offering the opportunity for participants to gain certification in the SCQF Level 4 Award for First Aid for Mental Health Awareness and/or SCQF Level 5 Award in First Aid for Mental Health. Quality assurance assessors were top of their priority list when launching this free training three years ago. It is now embarking on refresher and/or suicide prevention training. The training is delivered by former Royal Marines, which resonates very well with people in Scottish agriculture, according to RSABI.

The **RABI** charity provides farm focused mental health training to a wide range of agricultural organisations, including assurance bodies and continues to seek expansion of the initiative. All staff providing direct support to farming individuals receive extensive mental health and suicide training which is subject to regular update and review.

Recommendation 1.11: Promoting consistency in inspections (page 91)

Where possible, there must be greater consistency in the appointment of an auditor to a particular farm business, to enable a better understanding of that business to be generated in the audit process. It is recognised that this will be subject to accreditation requirements and that a term of appointment may be necessary, but that term should be sufficient to enable an auditor to get to know the farm they are auditing.

Action: Farm Assurance Schemes

Timescale: 12 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G		Х					
SQC	Х						
QMS	Х						
Red Tractor				Х			
RSPCA	Х						
WLBP	Х						
Soil Association	Х						
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC	Х						

OF&G believes that the accreditation process works well, but there are still anomalies between schemes, certification bodies and different auditors. It commented that UKAS miss a lot due to lack of knowledge and understanding. A well-run Governing Board is the best way of policing this with a good complaints process.

As already noted under the previous recommendation, **SQC** and its certification body must adhere to the accreditation (ISO IEC 17065) requirement, with only assessments conducted by the assessor. If there were changes to the accreditation requirement, then a more supportive relationship could be cultivated. However, the integrity of the SQC scheme relies on impartiality, which may be compromised, should an assessor become over familiar with a site/member. The SQC CB offers to change assessors at the member's request (where feasible) to ensure a constructive assessment environment can be created.

Similarly, **QMS** noted that assessors can assess the same farm 3 years in a row (some areas are harder to comply with this). A key challenge is the need to adhere to the accreditation (ISO IEC 17065) requirement that only 3 assessments can be conducted by the same assessor.

Red Tractor stated that it will consult with UKAS and certification bodies to identify what is possible vis a vis this point, whilst maintaining a balance between consistency and objectivity. It wrote to all RT certification bodies about this in March. RT will also investigate whether capturing key information on IT systems and portals could assist with better knowledge retention in the future, if the individual auditor must change, for whatever reason.

RSPCA recruitment is carried out under the Review of its CB to ensure compliance with ISO 17065 (in respect of the assessor having the correct background, skills and experience). This is then supported with annual training, coaching, calibration and testing throughout the career of the assessor.

The **Soil Association** noted that the rotation of auditors is part of its accreditation process.

Recommendation 1.12: Inspection as a career path (page 91)

Farm assurance schemes must collaborate to secure and improve the pipeline of experienced and trained farm auditors. This may require greater engagement of farm assurance schemes with external bodies (such as colleges and universities), and publication of how this is done, to raise awareness of farm assurance as a potential role of interest (even if part time) to the next generation of farmers. It could involve work experience placements, student projects on farm assurance and discussions with course tutors on the latest developments in farm assurance and how they can be built into educational curricula.

Action: Farm Assurance Schemes

Timescale: 12 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G			Х				
SQC	Х						
QMS	Х						
Red Tractor		Х					
RSPCA				Х			
WLBP					Х		
Soil Association					Х		
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC						Х	

Global GAP is involved with many universities globally, as well as employing students.

OF&G suggested that all certification bodies are different and recruit and train differently, but think there needs to be a common policy and pay structure that rewards those who do it well.

SQC pointed out that it is not the scheme owner that appoints the assessor/auditor – it is the certification body. SQC's CB has actively engaged with SRUC and Lantra to investigate opportunities to create a route to entry for future assessors, making it a definitive career path with supportive qualifications. Its certification body is also investigating an assessor apprenticeship scheme to complement the full-time assessor model it operates in conjunction with sub-contracted resources. This would provide a better route to a career in this type of work to ensure all relevant technical and soft skills are well developed prior to qualification.

This approach is similar for **QMS**, whose certification body also has a pathway for trainee assessors that can work their way up the system, as part of their career development.

As part of **Red Tractor's** action plan, it will consult with certification bodies who contract/employ auditors as they are a key partner in addressing the area, together with universities and colleges. It has started progress against this recommendation by writing in March to certification bodies and other farm assurance schemes, offering to discuss how they can all collaborate to address this important topic. RT have also met with TIAH and BASIS to discuss other training opportunities for assessors.

The **RSPCA** felt confident in their approach to recruitment, however, it always looked at how it can improve succession and resource planning for the future.

The **Soil Association** reported that it was not able to leverage this change.

Recommendation 1.13: Risk-based inspection (page 91)

There must be a reduction in the frequency of farm assurance audits for those farm businesses that are consistently compliant, building upon the risk-based audit approach that we recommended and which should be adopted by farm assurance schemes. Farm assurance schemes must also consider having a focus on topics while auditors are on site, which, alongside the greater use of technology to deal with remaining audit requirements that can be reviewed before the farm visit, could release more time for the auditor to assess more aspects of farming practice rather than assembled paperwork.

Action: Farm Assurance Schemes

Timescale: 2 years

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G		Х					
SQC				Х			
QMS				Х			
Red Tractor						Х	
RSPCA				Х			
WLBP	Х						
Soil Association	Х						
Agri Audit	Х						
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC	Х						
EA						Х	

Global GAP offers a reduced checklist in Year 2 and 3 for those carrying out the assessment.

OF&G believe that all farms should be risked scored and league tabled. They cite **Arla** as doing this already, such that they drop their bottom 10% and replace with others from the top 10%. Earned recognition is an essential mechanism and raises standards. They believe the IT capability to do this is available, but overseas investors in UK certification bodies are reluctant to invest at the expense of shareholders.

SQC and their certification body welcomed this position, providing scheme integrity is not undermined. The variety of technology options and collaborations that are being used by SQC and their certification body demonstrates there is opportunity to change how assessments are delivered. Using remote monitoring, self-submission and risk-based decision audits can make assessments more meaningful to members by focusing on key areas for improvement and promoting greater engagement with scheme standards. However, SQC questioned if all growers are ready for these changes, and if not, who will be

responsible for supporting members in being able to take advantage of technology options that will promote the desired changes?

SQC released auditee portals to assured growers in June, with a great amount of functionality that is yet to be explored. But it is evident that not all growers want to engage – or yet have the ability to engage - with this technology.

As part of the **QMS** tender review process, it is undertaking an appraisal of different approaches to assessment frequency. Its approach will be finalised in early 2026, to allow it to maintain consistency with contractual requirements and the needs of the schemes in Scotland. It already has a risk-based system in the pig and processor scheme.

Red Tractor noted that this links closely with Recommendation 1.5, and that all RT sectors fully agree that this approach is an important ambition, whilst also recognising the risk assessment method, and ways to deliver it, will need to incorporate sector differences. RT will work with UKAS, it's certification bodies, regulators and other farm assurance schemes to ensure all aspects around audit efficiency and best use of time are considered in developing an achievable road map by sector. RT is set to publish progress updates on this topic on an ongoing basis.

While RT agrees with the principle of longer time periods between visits, based on previous audit outcomes, delivering this objective will require consultation and agreement with the entire food chain, including retailers and foodservice companies, to ensure risk-based audits are practical and acceptable to customers.

WLBP welcomed this approach. To reduce the audit burden, it proposed that members would enrol in a different assessment regime, whereby surveillance assessments are introduced as part of the routine assessment process (e.g. two surveillance assessments and a full assessment on the third with an 18-month cycle). Surveillance assessments would be devised to concentrate on key elements of the scheme standards, but predominately on farm environments and livestock. WLBP trialled this approach during the COVID period and have experience of delivering it on over 5,000 farm assessments - the outcome proving beneficial for farmers and to the scheme, with no reputational risk to scheme standards or the integrity of farms. A wider risk assessment will then build on this approach to consider different elements and to devise an appropriate and proportional risk rating for farms.

The **BEIC/Lion Code of Practice** already has risk-based inspections to reward those who are consistently compliant with the standards. It will be reviewing the technology available to assist farmers and auditors to free up auditors to spend more time conducting physical inspections and/or to make audits more efficient for all. The farm assurance scheme working groups that have been formed will play a role in sharing best practice, which is a good development resulting from the UKFAR.

The **Environment Agency** reported that, this financial year, it is piloting an EA Reduced Risk Scheme (EARS) which is intended to replace the concept of "earned recognition" with a more achievable model. It will focus on targeted inspections based on risk profiles and will work with food chain organisations to collect robust compliance data. Farms demonstrating good management may therefore face fewer inspections. A broader rollout of the scheme is expected in the next 1-2 years.

With regard to Strategic Recommendation 1, **LEAF** commented that it has engaged in ongoing dialogue with other standard owners, including Red Tractor and Global GAP, on alignment between their respective controls. It has also recently revised the LEAF Marque standard and, following a period of public consultation, it was sent for accreditation by UKAS to ensure that it aligns with the scope of ISO 17065 and can be consistently implemented through independent CB's, for whom it also provides auditor training. The initial feedback LEAF has received from UKAS has been very positive and it anticipates launching Version 17 of the LEAF Marque in October.

Strategic Recommendation 2: There must be a transformational step forward in embracing technology and managing data to deliver more effective farm assurance with greater added value for all.

Recommendation 2.01: "Tell Us Once": making good use of data (page 92)

Farm assurance scheme auditors must be mandated to review their scheme's online portal prior to their audit visit and to conduct a "tell us once" review of the documentation placed on the portal by the farm business. This is to enable the audit visit to focus more on any essential missing documentation and a review of farming practice during the audit visit. Farm assurance scheme auditors must be required to provide written evidence that the pre-visit portal/repository review has been conducted.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP		Х					
OF&G				Х			
SQC			Х				
QMS	Х						
Red Tractor	Х						
RSPCA			Х				
WLBP	Х						
Soil Association	Х						
AgriAudit	Х						
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC	Х						

Global GAP noted that it is in the process of rolling out improved IT systems.

OF&G believe that a lack of investment from international owners of certification bodies makes this hard to achieve.

SQC is working closely with its certification body to develop compliance tools that allow for pre submission of audit evidence via alternative methodologies, which are currently commercially sensitive, thus reducing the "admin" burden during the assessment. It noted that these will only be successful if the farm business proactively engages and ensures the information is made available within a reasonable timeframe to allow the auditor to review it.

QMS has been exploring this with their CB over the last 12 months and have planned to pilot a QMS portal from October 2025. In the first phase, this will be to allow members to log in and upload stock figures for self-verification, introducing them slowly to the concept, with a view to them uploading documents and corrective actions in future. It is conscious that other standard owners have recently released portals via their CB, with mixed feedback, which it is looking at learn from. In terms of working towards wider use of technology, this is an area it is investigating as part of the certification body tender that is due to go live in April 2026.

Red Tractor and its sector boards unanimously agreed with this recommendation on the proviso that farmers, given their wide variation in levels of technology adoption, can still choose whether to use the portal or not. Priority work is already underway to improve the portal experience for assessors. It planned to deliver training and issue a survey for further feedback on ideas for improvement by April 2025. RT wrote to all CB's in March, stressing the importance of all assessors using the portal where farmers indicated they wanted to. RT recognised this issue several years ago, developed its portal in late 2019 and launched it in 2020, partly to address this and partly to address the challenge of the COVID pandemic.

RSPCA noted that a review of its member portal is part of the key strategic aims. It intends to develop this further in future, with the ability for members to upload more documentation than they are currently able to. This will further reduce the audit burden, It will also allow auditors to spend more time with the members and the animals under their care. This review is taking place, alongside a wider review of necessary technology improvements. These will then be prioritised according to cost vs. impact. It then plans to update members and supply chain partners in due course.

WLBP have provided all its members with a digital platform and phone app to be able to be fully compliant with the scheme requirements. This platform has been in place for over 10 years, with support given over the phone and in person on how to utilise its functionality. WLBP will be advancing its internal database management systems, to further improve its offering. During the spring of 2025 WLBP revisited and trialled the process with farm assessors to evaluate its effectiveness and demand.

Farmers gain insights, in this case, on antibiotic use of their enterprises alongside disease conditions and how they can improve health welfare and productivity on farms. The data is aggregated on a membership scale to provide evidence of responsible antibiotic use by Welsh farmers. WLBP recently won the UK technology and innovation award at the Antibiotic Guardian Group Awards for its work in this field. WLBP, with farmer permission, collects the data on its members' behalf and distributes the data to their destination of choice through a permission platform. This provides market access and provides additional premiums in some supply chains.

The **Soil Association** stated that these aspects of audit preparation are a standard part of the audit process. Missing documents are usually requested prior to the audit.

BEIC noted that the audit methodology of NSF is constantly under review and the use of technology can always lead to improvements in audit efficiency. It believes there is more that it can do in this area, however, introducing new IT systems is not a 6-month task. Nevertheless, each audit of a laying farm and other registered site is independent of each other. Documentation is relevant to each audit and must be available to support the achievement of the Lion standard(s) during the audit. There is no duplication of effort or review.

Feedback from **AgriAudit** suggested that from the farmer's perspective, the current situation with multiple online portals across different schemes and supply chains is still confusing and time-consuming. Instead of making compliance easier, it often results in duplication, re-uploading the same documents in different places, and uncertainty about which version is up to date. This hinders, rather than helps, farmers. A single, centralised portal would be far more efficient - a "tell us once" system where documentation is uploaded once and recognised across schemes. This is exactly the problem AgriAudit is aiming to solve, by creating one platform that streamlines compliance and reduces unnecessary duplication.

Recommendation 2.02: Data ownership: the need for resolution (page 92)

Any outstanding issues surrounding the ownership, holding and use/sharing of data required by farm assurance schemes, following the UKFAR and streamlining of current standards recommended must be clarified, in conjunction with farming industry bodies. The results need to be communicated to the farming industry as soon as practicable. It is recognised that certain farming data may be seen as valuable by assurance scheme members, but it is essential that value creation by a farming business is not conflated with the use of anonymised data that can help direct improvements in farming assurance and farming systems. This distinction needs to be "written in" to an industry compact about data ownership, custodianship and use that will be vital if the longer-term benefits arising from the wider use of technology in farm assurance systems are to be realised.

Action: Farm Assurance Schemes, NFUs and the AHDB

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G				X			

SQC	Х						
QMS	Х						
Red Tractor	Х						
RSPCA				Х			
WLBP	Х						
Soil Association					Х		
AgriAudit	Х						
LMC NI						Х	
SEDEX	Х						
LEAF						Х	
NFU			Х				
NFU Scotland			Х				
NFU Wales		Х					
UFU				Х			
AHDB			Х				
BEIC	Х						

Global GAP noted that it has detailed requirements for rules and data sharing and privacy that are in line with all data protection laws.

OF&G noted that there is a lot of good data collected, but it cannot be utilised, due to the rules on this set out by UKAS. It suggested that it would be beneficial for the data to be used in benchmarking for the good of the industry and to potentially support reduced cost of assurance data collection.

SQC is already compliant with this recommendation, and it is covered within Membership Rules 62 to 68 (Confidentiality and Data Protection). These rules outline what can/cannot be done with data. All members were provided with a copy of the Membership Rules on introduction in October 2023. Should any changes be required to the rules, members must be consulted/provided with an update. New members receive a copy of the Membership Rules on application to the Scheme. The document is readily available on the SQC website. SQC annually provides the Scottish Government and the European Commission with anonymised data, with regard to cropping areas and type. Currently, it has not been asked by any other agencies to provide additional data. SQC is in discussion with Food Standards Scotland to look at a Memorandum of Understanding which may require it to share information on critical non-compliances – but discussion on this is ongoing. SQC is more than willing to engage in discussions with the Farming Unions and the AHDB to consider this further.

QMS as a levy board, has supported work with the AHDB on data and has also worked with Scottish specific stakeholders including NFUS to map out what a Scottish specific approach would look like to ensure the Scotch brand credentials are protected.

Red Tractor recognised that the issue of data ownership is extremely important to members, so this recommendation is supported. RT wrote to those identified to lead this action offering to collaborate, at a time they feel is appropriate. RT Membership Rules (61 - 67) clearly cover Confidentiality and Data Protection, and are in line with the UKFAR recommendation. In February 2024, Red Tractor was awarded a full Farm Data Principles Certificate, independently verifying that it operates to the highest standards of data security, privacy, and integrity.

RSPCA's recent investment in resources to deliver its strategic aims has enabled it to create a new data and impact team. This team will be looking at data the scheme currently collects, what other data it could or should collect, and how best to utilise it to drive further improvements in farm animal welfare, increase the impact of the scheme and increase value for members and supply chain partners.

In addition to its ongoing work, **WLBP** has had broader discussions around some key data topics that industry organisations are considering across the UK in which NFU and the AHDB are included.

The **Soil Association** commented that for compliance with this objective to work, it would require an "industry compact" to exist.

BEIC stated that there are no issues to resolve with data ownership within the Lion Scheme.

SEDEX is also already compliant as SMETA audited sites already own their own data.

AgriAudit's feedback concludes that data ownership and use remain areas of real concern for farmers. At present, there is little clarity on how the information collected through assurance schemes is held, shared, or potentially monetised. Farmers often feel that their data is being used without their explicit consent, or without any clear explanation of how it will benefit them in return.

The UKFAR recommendation is right to draw a distinction between anonymised data that can help improve systems, and business-level data that is commercially sensitive and central to a farm's value. Without clear safeguards, farmers worry that their information could be used in ways that undermine their competitiveness or erode trust. From a farming perspective, what is needed is a transparent industry-wide "compact" on data: who owns it, who can use it, and for what purposes.

When consulted, **NFU** members felt there were opportunities to use technology to improve the audit experience and to help avoid duplication or repetition. They felt there may be scope for data sharing between organisations to benefit scheme members. When considering farm data, they believed that when farm data is shared, it should be used for the purposes described and ownership of data should remain with the farmer, or if it is transferred this must be abundantly clear. Farm data may have a value, financial or otherwise, and this should be respected. The guidance set out in Farm Data Principles will make a vital starting point in upholding the highest standards in farm data governance.

The **NFU** is actively involved in conversations around data sharing, with the **AHDB** leading the discussions. It has also been involved in conversations in Wales around the use of farm data, through a mutual or cooperative structure, although this work is still in its infancy. It has been working to drive discussions on this matter, but at a pace that is realistic and with the view to building consensus. The conversation around the use of farm data has also arisen in the context of work on the new Sustainable Farming Scheme (SFS) which will replace CAP legacy schemes (i.e. BPS) in Wales. The NFU has been a key part of the discussions in the Ministerial Roundtable, the Officials Group and various other subgroups.

NFU Scotland believes data ownership remains a thorny area of discussion, as it is a major concern for members. It has established a set of Scottish data principles to guide policy work in this area. NFUS is embedding discussions around data in policy work around future support and innovation, to put more emphasis on data being seen as a management tool to aid decision making. NFUS see its role in relation to data as reassuring members, whilst enabling them to see the opportunities that it can provide. More broadly, it is understood that the **AHDB** has commissioned work on data and NFUS has volunteered to engage with this process.

The **UFU** is actively involved in discussions with all UK schemes and the other farming unions to build a shared understanding of data ownership. A core part of the work with the broader industry is to establish clearer data principles to develop a more efficient system that provides clear value to producers, such as a reduced audit burden.

NFU Wales believes that future technology and data systems must be built on a clear understanding of data ownership, with an emphasis on creating tangible value for the producer. NFU Wales is also actively involved in conversations around data sharing with the AHDB leading the discussions, along with collaborating with WLBP. Data continues to be one of the core themes of meetings which include all UK assurance schemes and farming unions.

The **AHDB** noted that talking about control of data and data sharing is much more applicable to their agricultural use-cases than data ownership. A farmer usually will not "own" most data about their farming operation, but they should still have a right to control the sharing of data about them and their farming activities. As such, the AHDB recommends that this recommendation is retitled "Industry Data Governance" if possible, to avoid confusion.

The AHDB is also continuing to work with industry bodies, ensuring that there is no re-invention of the wheel on this topic. It is actively investigating data governance solutions from other industries, and within agriculture across the EU. It is engaging with DEFRA around the FIG (Food Data Infrastructure and Governance) research project which was due to be tendered in the summer.

During the UKFAR roundtable discussion in May 2025, there was a general acceptance that Farm Data Principles (FDP) had a solid offering to help agri-businesses certify their approach to data governance, as a "first rung of the ladder", but that additional structures and guidance would be needed to more fully address challenges in this area. The AHDB intends to produce an industry discussion paper in Q3/Q4 2025, to obtain consensus on a pan-industry approach to data governance, incorporating both cooperative models, and the continuing the good work of FDP in this area.

Recommendation 2.03: Creating a data co-op (page 93)

Farm assurance schemes, working together, should support the feasibility work into a data co-op, building on activities already started by Scottish Agricultural Organisation Society Ltd (SAOS), whereby data could be shared across the private and public sector, to reduce duplication and improve efficiency. However, through a co-operative mechanism, farmers should retain control of the commercially sensitive data, manage consent and protect any commercial value associated with it. Consideration must also be given to replicating the approach seen in Wales, for the development of data hubs that can be used to pull data sources together to provide guidance and resources for the farming industry and inform the development of farming practices and policies.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G					Х		
SQC			Х				
QMS	Х						
Red Tractor						Х	
RSPCA				Х			
WLBP	Х						
Soil Association					Х		
Agri Audit	Х						
LMC NI						Х	
SEDEX	Х						
LEAF						Х	
AHDB		Х					
BEIC					Х		

Global GAP commented that they are imminently compliant on this point, but that details of this are currently confidential.

SQC has already engaged with SAOS, NFUS and QMS to discuss a farmers data co-op in Scotland and await an update and next steps. SQC agrees with the principles noted in this recommendation and is willing to work with key partners and stakeholders in its development. It believes that in the future, this will be fully developed, but not within the requested timeframe of the UKFAR.

Red Tractor engaged with the NFU/AHDB hosted meeting in May and received an update on the AHDB Farm Data Sharing Proof of Concept. RT will consider the results of the AHDB proof of concept and consult with farming stakeholders on most the appropriate next steps for the RT handling of member data. This topic is due to be discussed at a roundtable in October.

RSPCA reported that it will incorporate these suggestions into the thinking of the new data and impact team, as it develops further.

The **Soil Association** also supported the principles around data ownership in this recommendation.

BEIC are taking part in industry discussions on this topic, however to date, it has not identified anything that would be applicable to how they manage data held within the Lion Scheme.

This is a function **SEDEX** already partially fulfils, through the SEDEX Platform that enables suppliers to share their data and audit reports with multiple customers in one go. SEDEX is open to engaging with other data-sharing schemes where relevant, but none have yet been identified for UK farmers through this review. SEDEX supports further feasibility work to explore additional solutions, as demonstrated by continued engagement with the UKFAR and other stakeholders. It remains open to future discussions about further data partnerships that respect all relevant data privacy and security requirements.

AgriAudit noted that the work already started by SAOS in Scotland is encouraging, and the Welsh example shows what can be achieved, when data is shared in a way that benefits both farmers and policymakers. However, from a farming perspective, progress towards this recommendation has not yet been visible on a UK-wide basis, nor has there been consistent communication from assurance schemes about their role in developing such an approach. AgriAudit sees opportunities to align with this principle - giving farmers a single place to manage compliance, while maintaining full control over how their data is shared. Ultimately, any data co-op or hub will only succeed if it is transparent, farmer-driven and demonstrably reduces duplication, rather than creating yet another layer of complexity.

The **AHDB** Farm Data Exchange (FDE) Proof-of-Concept (PoC) project is now underway and is seeking to complete (and publish) its findings by March 2026. The PoC seeks to demonstrate that a decentralised data sharing system is achievable for the industry in England, and that it can embed sufficient farmer-control mechanisms to overcome the significant trust barrier which previous efforts have encountered.

As the PoC project nears completion, discussions will build on whether this concept is taken forward to address some of the challenges encompassed in this recommendation, and the AHDB's role in that. If taken forward, FDE offers the opportunity for a decentralised cross-industry solution to data sharing, which supports the need in farm assurance for activity data, as well as many other use-cases. This approach should make it easy for a "collect once, use many times" approach, controlled by the data owner to optimise value.

Recommendation 2.04: Supporting farmers in a digital world (page 93)

Farm assurance schemes must publish information about the training programmes they have put in place to help improve farmer take-up of current technologies used within their scheme. They must also ensure that future system developments include relevant training for end users at cost to the scheme, not to the farm business.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G				Х			
SQC	Х						
QMS	Х						
Red Tractor	Х						
RSPCA	Х						
WLBP	X						

Soil Association	Х				
Agri audit	Х				
LMC NI				Х	
SEDEX	Х				
LEAF				Х	
BEIC	Х				

Global Gap reported that it operates an academy for this type of training.

OF&G felt that there needs to be one training body that is totally independent to train auditors, farmers and stakeholders.

SQC has been recently working with their certification body, FIA, to develop member portals. It has actively communicated and promoted the benefits of this system - providing both in-depth and summarised documents, detailing how to sign up and access the portal. This is stage 1 of a project to embrace technology to reduce duplication - thereby reducing the audit burden. In developing the system, SQC has agreed to provide further relevant training where appropriate. The cost of the member portal and training materials has been covered by the scheme.

QMS does not have any current technology being used, so this does not apply. It works with the Farm Advisory Service and agricultural colleges in Scotland to explain the role of quality assurance and the role of QMS in supporting the Scotlish red meat industry, creating links for future engagement.

In April 2025, **Red Tractor** was due to publish its first regular update on its website about the RT portal, how it works and the benefits to members of using it, together with a survey for farmers to feedback ideas for improvement. RT currently provides user guides and a video on the website to help farmers use the portal.

RSPCA noted that any changes to their use of technologies, for example improvements to the member portal, will be accompanied by significant engagement with the end users.

Soil Association Certification reported that it has a long history of supporting licensees in engaging with the certification process – both paper based and digital aspects.

BEIC noted that when system developments take place that impact either packers, producers, or other registered sites, training is provided.

SEDEX provides extensive training and guidance materials to members. Much of it is freely available and provided at its own cost. Free training and guidance includes online training covering SMETA Essentials, the Supplier's SMETA Resources Toolkit, the Supplier Manual, regular live training sessions, eLearning courses, written guidance, SEDEX Community events and webinars. It provides additional ad-hoc training on new solutions or significant upgrades to existing ones. All these events, sessions and materials are designed to enable members to better understand and use solutions and derive maximum benefit from them. The SEDEX multi-lingual helpdesk team remains available to support with set-up, onboarding, user queries and so on.

LMCNI is working on proposals for industry on the use of technology and data for animal health planning could meet the requirements of NIBLFQAS and EU animal health law. It also plans to agree an industry roadmap to evidence antibiotic usage in the NI ruminant sector, as a method of electronic medicines recording.

AgriAudit noted that, from a farming perspective, there is little evidence that assurance schemes have to date invested meaningfully in training farmers to use the digital systems and technologies linked to their standards. New portals and processes are often rolled out with limited guidance, leaving farmers to work things out themselves, or to bear the cost of training and consultancy support. This creates an unnecessary barrier to adoption and contributes to frustration with assurance schemes. If farmers are expected to engage with new systems, it is only fair that the schemes themselves take responsibility for ensuring these tools are accessible, user-friendly, and supported by training at no additional cost to

farm businesses. At present, most schemes appear to treat training as optional or farmer-led, rather than publishing structured programmes to build confidence and skills. This is a missed opportunity, because good training could not only make compliance smoother but also help farmers get real value out of the technology.

Recommendation 2.05: Future possibilities: harnessing collective expertise (page 93)

The farming industry should seek to facilitate a regular "hackathon" – inviting subject matter experts and institutions to help gather relevant businesses/academics to address the question of the longer-term use of technology in farm assurance. The literature review for this report shows that the topic of technology is often raised as a solution, but there has been little collaboration and focus on building solutions that will help reduce the burden of assurance on farming businesses, whilst satisfying the information needs of those who rely upon farm assurance for wider business or regulatory purposes.

Action: NFUs, the AHDB and the DEFRA Data Group, working with Agri-Tech E and/or the UK Agri-Tech Centre and participating Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
DEFRA Data Group				Х			
AHDB			Х				

The **DEFRA** data group focus has been on carbon reporting across the last number of meetings. It noted that discussions on this recommendation have not yet begun, however the AHDB "proof of concept" project has been launched in alignment with this recommendation.

Although the **AHDB** does not view this is an urgent priority, it remains ready to support industry "Hackathon" events, with clear and actionable use-cases from across the industry, once an appropriate lead organisation or set of organisations has been identified.

Both **Agri-Tech E** and the **UK Agri-Tech Centre** are willing to assist with the implementation of this recommendation, when there is further clarity around the demand for, and timing of, such events.

Recommendation 2.06: "Tell Us Once": collecting and storing data (page 94)

Farm assurance schemes must ensure that they have a portal or similar data repository which can be used by scheme members to host information required during their audit visit. The format of that data should be flexible (for example, data provided from farm management systems, relevant images, scanned copies of certificates etc).

This is to better provide for data collection during the audit cycle, rather than during the period immediately before the audit visit. Information provided via a portal/repository should be a mandatory element of data collection and, to this end, farm businesses must be positively incentivised by farm assurance schemes to use these basic technologies as part of the audit process. Furthermore, farm assurance schemes must publish annually the take-up of their respective portal/repository by scheme members, so that a record of progress towards universal use of such systems is publicly available.

Action: Farm Assurance Schemes

Timescale: 12 months

	1	2	3	4	5	6	7
Global GAP		Х					
OF&G		X					
SQC			Х				

QMS		Х				
Red Tractor	Х					
RSPCA			Х			
WLBP			Х			
Soil Association		Х				
Agri Audit	Х					
LMC NI					X	
SEDEX					X	
LEAF					Х	
BEIC	Х					

OF&G believes that as much as possible should be done online using cloud-based documents, allowing auditors to spend more time outside, during their visits where they can find more insight.

SQC's certification body operates auditee portals, which provides a compliance management tool. It is not a document repository, but there are ongoing discussions to collaborate with a commercially available platform which does provide this function – and can meet the needs of multiple schemes as opposed to an individual scheme having its own portal. SQC will continue to support its CB to progress this engagement to provide a suite of technology options for members to greatly reduce the assessment burden. SQC has portal use data that can be shared in due course.

The **QMS** certification body is rolling out a (QMS) portal in October 2025 that is being piloted on pig scheme members. The initial thought was to allow them to log in and upload stock figures for self-verification, introducing them slowly to the concept, with a view to them uploading documents and corrective actions going forward. This will allow lessons to be learned and will provide feedback for a wider roll out of a portal for QMS cattle and sheep assurance scheme members.

Red Tractor and its sector boards unanimously agree with this recommendation, but feel that doing it at this time would not be appropriate, as it should be a farmer choice, with efficiency and visit frequency driving that decision. Red Tractor will though publish the first of a regular update in Member Matters and on its website about the RT portal and the benefits to its members of using it. As of March 2025, the RT portal has been used for documents relating to its member sites. RT has committed to publishing an update on usage figures annually.

Data collected by the **RSPCA** and how it is used are part of its strategic goals. It noted that anything it can do to add value to members in the sharing of this data is very much under consideration.

WLBP delivers its farm assurance schemes via an interactive database system. The application is a bespoke digital solution which also acts as a repository for a significant dataset. Assessments are delivered digitally, using database linked hand-held technology which automatically updates the data repository. The system can provide reports as required and provide KPI's, trend, and benchmark analysis, as required. WLBP has pioneered a digital system to harvest, cleanse and store data from its members. This system recently won a prestigious UK award for "Innovation and Technology" at the Guardian Stewardship Awards for Antibiotic Control.

The **Soil Association** reported that a portal is already in place.

The **BEIC** response was that there currently is not a relevant online portal for assistance in completion of a Lion audit. Auditors will, though, review previous inspection results before attending sites.

AgriAudit still feel that farmers are already overloaded with multiple portals and fragmented systems, each requiring similar information to be uploaded in slightly different formats. While the idea of a portal or data repository is sound in principle, the way it has been implemented by most assurance schemes seems to add to duplication rather than reducing it. The requirement that data must be flexible - drawn from farm management systems, scanned certificates, or images - is essential.

However, in practice, portals are often rigid and fail to integrate with the systems farmers already use. This creates extra work and pushes the burden onto the farm business. From a farmer's perspective, what is needed is not "every scheme with its own portal" but one shared solution. This is the vision behind AgriAudit: a single platform that allows farmers to upload compliance information once, in a flexible format, and then use it across multiple assurance schemes. This would make the process more efficient and transparent, while also supporting schemes with the reporting they require.

Recommendation 2.07: Alternative approaches (page 94)

The AIMS/Veta verse scheme, along with other schemes under development using new technological approaches, should be explored further, with support from others, to provide a strong focus on their governance structures, data ownership and funding models.

Whilst not an immediate replacement for accredited farm assurance schemes, as they currently stand, technology-based approaches, such as that proposed by AIMS, may have the longer-term potential to disrupt current methods of farm assurance in the livestock sector, and could also bring non-assured livestock products into farm assurance scope. Like similar initiatives, it will need to move from concept to coordinated application, with the support of other actors in the food supply chain, the government and the wider farming industry.

Action: New scheme developers to work with the AHDB to support the development and delivery of novel approaches to farm assurance

Timescale: 12 months

	1	2	3	4	5	6	7
Agri Audit	Х						
AIMS	Х						
AHDB	Х						

AgriAudit noted that technology-based assurance initiatives, such as AIMS/Vetaverse, have clear potential to modernise the way farm assurance is delivered. By using digital tools and real-time data capture, these systems could reduce duplication, streamline evidence collection, and bring non-assured livestock products into scope. For farmers, this could mean less emphasis on paperwork-heavy, point-in-time audits and more on continuous, practical assurance.

However, for such models to succeed, issues of governance, data ownership, and funding must be carefully addressed. Farmers must remain in control of their data, with clear safeguards over who has access and how information is used. Without this, uptake will probably be limited and trust undermined. The funding model also needs to be fair and sustainable, ensuring that costs are not simply pushed onto farmers.

WLBP reported that it saw no merit in downgrading farm assurance by offering a simpler alternative to farmers, which may only cover minimal requirements. WLBP believes that the schemes delivering farm assurance should be managed and delivered by farmers and not intermediaries in the supply chain.

AIMS strongly supported the recommendation that new, technology-driven assurance schemes be further developed in collaboration with key stakeholders across the food chain. AIMS, together with the Vetasure development team, is finalising a formal agreement with the **AHDB** to co-fund and support the delivery of a UK-based proof-of-concept (PoC) pilot at levy-payer level.

This PoC aims to demonstrate how continuous, real-time assurance - using blockchain, Al risk analytics, and on-farm data capture - can enhance existing models, reduce audit fatigue, and extend the reach of assurance to previously non-assured livestock. The system will provide end-to-end traceability, risk profiling, and performance benchmarking, enabling a more dynamic and evidence-based approach to assurance.

As part of this initiative, AIMS are also in advanced discussions with the IOTA Foundation, a globally respected, not-for-profit organisation with international reach and a strong track record in secure, scalable, decentralised technologies. The IOTA Foundation is expected to act as an independent data curator, ensuring that the architecture and data governance frameworks underpinning the Vetasure platform meet the high standards of transparency. Their role will help to instil confidence in both the technology and the integrity of the information it provides to regulators, retailers, and consumers.

In parallel, **AIMS** is developing a second proof-of-concept to apply the Vetasure platform to the importation of beef from the US. This pilot will focus specifically on verifying the hormone-free status in US beef imports, providing an independently assured, immutable record of compliance for UK and EU markets. This application will serve as a case study in how the platform can support complex international supply chains and enhance trade confidence where regulatory alignment is challenging.

AIMS believe that the combination of trusted technological stewardship (via IOTA), producer-facing benefits (via the AHDB support), and international proof points (via US beef verification) will create a foundation for reimagining how farm assurance is delivered in the UK.

The **AHDB** has agreed to financially contribute to the Proof of Concept of the AIMS Vetasure system and anticipates lesson learning and synergy with its Farm Data Exchange project.

Recommendation 2.08: Keep it live: reviewing standards (page 94)

As new approaches to farm inspections are created, either because of emerging legislation or other regulatory requirements, a dynamic approach to implementing related exemptions in current farm assurance systems must be taken.

One example might be the impact of Vet Attestation and how this might be applied, or used as an equivalent method, to help reduce audit requirements in some farming sectors. We expect current farm assurance schemes to use data on a "tell us once" principle to avoid duplication of effort by farm businesses and to deliver greater efficiency in farm assurance processes.

Action: Farm Assurance Schemes

Timescale: 12 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G		Х					
SQC		Х					
QMS	Х						
Red Tractor	Х						
RSPCA				Х			
WLBP	Х						
Soil Association				Х			
Agri Audit	Х						
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC	Х						

OF&G believes that the current system works well, but there are huge differences between certain stakeholders, for example, between vets and agronomists.

In terms of **SQC** processes, reference should be made to responses on the SQC standards setting process under Recommendations 1.02 and 3.01; the approach to the "tell us once" principle under Recommendations 2.01 and 2.06; and its views on a data co-op under Recommendation 2.03.

SQC noted that it is more than willing to work with regulatory bodies to seek exemptions or equivalence, where appropriate. However, it is also aware it must continue to ensure that there is a clear line between legislation (i.e. inspections, and the voluntary approach, i.e. farm assurance). SQC is already active in this area, but it must be recognised by the industry, farming unions and other key stakeholders that there are processes which must be followed, when looking to put in place any exemptions, or a Memorandum of Understanding between an assurance scheme and a government body.

SQC has engaged with Food Standards Scotland for over 2 years, seeking a Memorandum of Understanding which would limit additional inspections for growers who have SQC assurance, but are legislatively required to undergo inspections for (animal) feeds.

SQC also has equivalence with the Scottish Government with regard to its Integrated Pest Management (IPM) Plan which has been a required standard via SQC for many years, but which the Scottish Government now requires as one of the elements under its Whole Farm Plan. This means that SQC assured growers do not need to complete a document twice. The industry must understand that the time taken to put these agreements in place is, mainly, not down to the farm assurance scheme, but rather a lack of resource/prioritisation/cost principle within Government departments.

Another – though major – outstanding issue is that since Brexit, the European Union no longer recognizes UKAS as a National Accredited Body, because one of their principles is that the NAB must be located (i.e. have an office) within a Member State.

QMS noted that it already covers this in detail within the Standards review process which includes a comprehensive benchmarking exercise.

In February 2025, **Red Tractor** changed the beef and lamb standard to recognise the DEFRA Pathway visit to demonstrate compliance with the standard requiring a health performance review. Details were published in a RT technical briefing. Sector strategies are currently being developed by sector boards and will include the principles outlined in the UKFAR. During the standards review (Recommendation 1.2) it will consult with sector boards and government agencies to identify other similar opportunities.

RSPCA noted that the development of standards is something that is always under review with the aim of ensuring continuous improvement.

WLBP supports the concept of using data for several outcomes and advises farmers of the "tell us once" concept. Data is seen as key to evidence 'earned recognition' and to underpin all claims made by assurance schemes, as well as providing evidence to the supply chain for farm outputs.

The **Soil Association** noted that inspections must follow the legal requirements for organic certification.

The **BEIC** receives input into governance structures from the whole egg supply chain and actively seeks opinions at other stakeholder meetings and events. This ensures that they keep standards "live" as far as possible, within the boundaries of UKAS and standard revision processes.

LMCNI added that following the publication of the UKFAR, the NIBLFQAS Industry Board and Standard Setting Committee approved a revised methodology to standards review. This looks at assessing standards to ensure they are adding value. NIBLFQAS must continue to provide a baseline of requirements to fulfil any supply chain requirements. LMCNI are acutely aware of the risk of divergence of standards or addition of further "bolt on" inspections. LMCNI will work with the NIBLFQAS Industry Board and Standard Setting Committee to develop an approach to refocus on NI specific priorities where outcomes are the same, but may be evidenced differently. There will also be a revised focus on using data and technology in a bid to reduce paperwork and the audit burden. This approach will add value to standards and ensure that assurance is fit for purpose. The NIBLFQAS standards review process was due to commence in winter 2025 with implementation in 2026. Given, however, the current landscape around future farm policy, changes within devolved policy and the UKFAR, the NIBLFQAS Industry Board and Standard Setting Committee have both approved a deferral of the standards review, to ensure this is a meaningful process when some elements of policy become better known.

AgriAudit noted that a more dynamic approach is needed - one that looks proactively at new regulatory tools and integrates them into assurance processes as legitimate alternatives. This would not only save time but also demonstrate that schemes are responsive to the changing landscape. For farmers, this would eliminate duplication and provide more clarity. For schemes, it would ensure consistency and transparency.

Recommendation 2.09: Investing in technology (page 95)

The intended outcome from the above recommendations is to deliver a technology and data driven environment, within the medium term, which is embedded within all farm assurance schemes and where farm business take-up is greatly improved.

However, it is recognised that technological developments are moving at a fast pace and farm assurance schemes will need to maintain, at their cost, a comprehensive strategy for innovation and investment in this element of their work. The aim should be for farm assurance schemes to work together, using the results of the proposed "Hackathons", to develop real time, mobile (i.e. farm friendly), data collection systems on which a rolling assurance system could be based.

Research by *Zhou et al* on Intelligent Food Assurance Systems (IFAS) shows that food assurance/food transparency/food waste and sustainability and business value can benefit from collaboration and improved data use. The technology for some aspects of this approach, enabling real time data collection for example, is already employed on many farms, but a greater coordination of effort, and engagement with the farming community, will be required to deliver a shift in farm assurance towards these methods and to enable aggregated data to be better used for best practice identification and feedback to farm businesses.

Action: The AHDB to coordinate with Farm Assurance Schemes

Timescale: 2 years

	1	2	3	4	5	6	7
AHDB				Х			

The **AHDB** noted that it should be recognised that the appropriateness of these technological solutions is going to vary a great deal from sector to sector, and across different farming systems. It is hard to imagine some of the novel sensing technology discussed in the Zhou et al paper, being affordable and supportable in a traditional extensive upland mixed livestock farm, for example.

This does not mean there is no merit in the recommendation. It is important, however, to recognise there is no panacea for the whole industry. The AHDB thinks its precise role that adds optimum value for the levy payers needs further debate, but several workstreams such as Farm Data Exchange will contribute to a successful future.

In response to Strategic Recommendation 2, **LEAF** noted that over the past two years, it has been developing a new IT platform for LEAF Marque in partnership with the independent specialist Dutch agri-tech provider, Agri Place. This is to enable the efficient sharing of information with auditors and to support individual farms and producers in the preparation for their LEAF Marque audit.

The first phase of this project was launched in July 2025. LEAF continues to work on further upgrades. The ambition remains to facilitate its use with other farm management software and related data sources to monitor environmental management practices and outcomes for the benefit of the farm and in support of efficient reporting.

Strategic Recommendation 3: Farm assurance schemes need to reset and/or restate their decision-making structures to establish farmers as the driving voice in standards development.

Recommendation 3.01: Creating and amending standards (page 96)

We recognise that farm assurance schemes have different ways in which they engage with the farming community, but it is essential that farmers are involved in the process of creating or amending farm assurance standards.

Initially, each farm assurance scheme must publish the way in which it achieves this objective, so that the routes for farmers to make their views known are clear. In the longer term, farm assurance schemes must collaborate to set out an agreed framework for the way in which consultation with the farming industry, beyond scheme board members, for example, is conducted.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G	Х						
SQC	Х						
QMS	Х						
Red Tractor	Х						
RSPCA	Х						
WLBP	Х						
Soil Association	Х						
LMC NI						Х	
SEDEX	Х						
LEAF						Х	
BEIC	X						

Global Gap noted that there are many ways in which producers and farmers are involved in this process, one example being National Technical Working Groups, along with a platform for public comments.

SQC has already undertaken a full review of its standards setting process to ensure that farmers are involved – and not just those who sit on the Standards Setting Committee. Through this process, SQC engages with farmers via the SQC Board of Directors, the Scottish Crops Supply Chain Hub (which has independent farmer representation) and directly with NFUS (via their comms channels and Combinable Crops Committee).

It should be further noted that NFUS is a member of SQC and has 2 representatives on the SQC Board of Directors (in addition to the fact that both the Chair and Vice Chair must be actively farming, i.e. growing crops).

QMS reported that farmer engagement with standard setting was a core element of the governance review undertaken in 2022. QMS made the following changes, which have been well publicised through the farming press and stakeholder networks:

- at least 50% of standards setting bodies must be farmers or farmer representatives, and they
 appointed 4 new farmer members to the cattle and sheep SSB who are not representing an
 organisation
- all proposed standard changes are sent to members for consultation, using a simple Survey Monkey based form for ease of completion
- before new standards are implemented, three months' notice is given, with a comprehensive communications plan to ensure farmers are properly engaged with
- "pop-up" surgeries are used in auction markets to engage more informally with members

Under the **Red Tractor** Action Plan, it is acknowledged that more can be done to ensure farmers feel consulted, listened to and able to influence decision-making on standards. It also recognised that farmers have concerns about representation. It is committed to continuous improvement in this area and will review how it consults on creating and amending standards. Feedback from members on standards (or other areas) will continue to be encouraged via direct communication or post assessment surveys and it will consider other methods. The contribution that farmers make to the development of standards, governance structures and on the Board is seen as being of vital importance to Red Tractor. Farmers are involved in RT Governance, at all stages, from the Ownership Body to Board, Sector Boards and Technical Advisory Committees.

RSPCA recognises that it can still improve on engagement with members and supply chain partners and will continue to do so. One example is recent changes to the laying hen standards, which after initial challenges from industry were reviewed and consulted on before their launch. Its drive to improve engagement with members continues to be part of the previously mentioned RSPCA strategic aims.

WLBP noted that its standards consultations will always involve its own members and external stakeholders that are relevant to the industry.

The **Soil Association** follows ISEAL codes and publishes the standards development process on its website. It has an independently chaired Standards Board, and an elected Farmer and Grower Board that is also represented in the Standards Board.

BEIC noted that the combination of its governance processes and communication methods mean that it is already communicating effectively to the industry on standards.

SEDEX has an existing, publicly available process for review and consultation on SMETA. It has committed to a minimum of 60 days open consultation for any substantive changes to the SMETA methodology in future, to ensure that all feedback is reviewed and considered. SEDEX continues to encourage its members to participate in these consultation and feedback opportunities.

Recommendation 3.02: Appointments to sector boards (page 96)

It is also essential that the process for appointing farmers to sector boards (or similar) as representatives of their sector are transparent and that those acting in this capacity are clear that they must engage with the wider farming community, to act as a representative voice for that community.

The process for appointment should be independent of the scheme's senior executive team so that those selected are able to appropriately challenge that team on the operation and development of the farm assurance scheme(s). Furthermore, there must be a clear role description for farmer appointments which sets out their obligations to act as a representative for the relevant industry sector and in the wider interests of the farming industry.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G		Х					
SQC	Х						
QMS	Х						
Red Tractor	Х						
RSPCA	Х						
WLBP	Х						
Soil Association	Х						
LMC NI						X	
SEDEX					Х		
LEAF						Х	
BEIC	Х						

Global GAP's technical committees already include representation from farmers.

SQC only covers one area of the industry (i.e. crops) – with a Board of Directors, an Executive Committee, a Standards Setting Committee and the Scottish Crops Supply Chain Hub. In terms of farmer representation on its Board, it has a clear policy that NFUS has 2 places on the Board (all other co-op partners are only entitled to one). Both the Chair and Vice Chair must actively farm, and their roles are independent (i.e. they represent the farming sector, not a co-op partner). Representatives from NFUS must come from its Combinable Crops Committee - to ensure relevant experience. The NFUS Combinable Crops Committee is made up of farmers nominated at NFUS membership regional level to the Committee – who must be actively involved in combinable crops. It is the responsibility of NFUS to determine who represents them on the SQC Board.

The **QMS** governance structure is different. As QMS is a Non-Departmental Public Body (NDPB), 50% of its board must be levy payers, and all board members are appointed by Scottish Ministers. Members of standard setting bodies are confirmed by the QMS board, with this reviewed annually, to ensure a good mix of skills and experience.

Red Tractor recognises that some farmers do not feel their voices are always being heard. To address this, it has planned to review the sector board's TORs, covering the structure of each sector board, how members are recruited and appointed, and their duties outlined to both represent their sector and disseminate information back. It will also examine how RT and those on the sector boards can be more transparent and engage with the wider farming community more thoroughly. Sector board TORs were due to be reviewed by July 2025. Farmers are involved in RT governance at all stages, from the ownership body to board, sector boards, and technical advisory committees. Details are available in the

RT governance handbook. Summaries of the RT board and sector board meetings are published on the website.

RSPCA has Term of Reference available on its website, which detail purpose, remit, role and Standards Technical Advisory Group (STAG) membership.

BEIC governance structures include clear appointment processes which are held at its AGM. The majority of BEIC members are also egg producers, and with the combination of the involvement of the farming unions and the British Free Range Egg Producers Association (BFREPA), plus other member organisations, it feels it has sufficient diversity of opinion in place to ensure it has rigorous conversations about its Code of Practice.

SEDEX and **SMETA** serve over 95,000 businesses that operate across more than 180 countries and 35 sectors. As it is not a UK farm-specific organisation, it is not possible to guarantee a representative from UK farming on its Board. However, all members may vote in and apply to stand as candidates in the Member Director Elections as and when vacancies arise on the Board, as happened this year. SEDEX did not receive any applications from farmers to stand as candidates in the 2025 Member Director Elections.

Recommendation 3.03: Board structures in farm assurance schemes (page 97)

All farm assurance schemes must review their structures and board composition to ensure that their skills mix is balanced and equitable across the food supply chain. They should use the Campbell Tickell report as a guide to ensuring that their governance arrangements deliver best governance practice.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G		Х					
SQC	Х						
QMS	Х						
Red Tractor	Х						
RSPCA	Х						
WLBP	Х						
Soil Association	Х						
LMC NI						Х	
SEDEX	Х						
LEAF						Х	
BEIC	Х						

SQC noted that it operates a streamlined structure which is seen to work well and is fully supported by representation across the farming and supply chain. SQC is a co-operative formed of farming and associated industry partners. The current members are:

- National Farmers Union of Scotland (NFUS)
- Scottish Agricultural Organisation Society (SAOS)
- Agricultural Industries Confederation (AIC)
- Scotland's Rural College (SRUC)
- Scotch Whisky Association (SWA)
- Maltsters Association of Great Britain (MAGB)
- Association of British Millers
- Scottish Agronomy Ltd

QMS reported that as it is an NDPD, this does not really apply to them. Its board is appointed by Scottish Ministers. Ahead of each recruitment round, a skills matrix is completed to ensure that skills gaps are identified and then targeted in the recruitment process. Board members are given an annual appraisal by the Chair where skills and knowledge gaps are identified.

Red Tractor welcomed the Campbell Tickell report in March 2024. RT has implemented its recommendations since then and published a report on how it had delivered the recommendations of in early June 2025. RT and its sector boards unanimously agreed that there must be a balance across the food supply chain on RT sector boards. Following a review of the sector board TORs in July 2025, it reported that it would review each sector board to ensure the skills mix is balanced.

RSPCA reported that it has a diverse range of skills and backgrounds represented across its board. With ten members, it has representation from the food supply chain, agricultural, veterinary and the tech sectors. Two of its board members, including the Chairman, are also trustees of the RSPCA.

WLBP noted that as a registered agricultural cooperative it has a constitutional transparent and democratic governance structure. WLBP farmer members are invited to attend a hybrid AGM and are invited to participate in the election of a board of directors, adopt the latest annual report and appoint reporting accountants. The board appoints its own Chairperson from the exiting board members, as well as relevant sub-committees who are appointed based on their skills and knowledge.

WLBP is of the opinion that the Campbell Tickell report was a basic representation of what is required as best practice, in corporate governance, as embedded in UK constitutional law. WLBP therefore strongly supports governance methods where producers shape standards which will ensure that the schemes remain relevant and trustworthy. WLBP's cooperative style and constitutional structure is a key strength and aligns with the Commission's recommended action for farmer-dominant decision making.

BEIC is satisfied that its governance structures cover the whole industry and provide a wide diversity of opinions and skills.

The composition of the **SEDEX Holdings Ltd** Board is dictated by its Articles of Association, which mandate a balance of representatives from both buyer-side and supply-side businesses across the Member Directors. SEDEX maintains representation from across global supply chain regions and industries, reflecting its multi-region and multi-industry membership.

Recommendation 3.04: Balancing scheme demands (page 97)

The statement of good practice for farm assurance as set out in the UKFAR must be revisited periodically by farm assurance schemes to ensure that the demands placed on various parts of the food supply chain represented in the farm assurance scheme remain balanced. It also requires that additional farm assurance costs arising from new or enhanced standards are shared across the food chain on an equitable basis. We suggest an annual review of this nature, with published outcomes, would provide the necessary assurance that such an assessment has been conducted and the results enacted.

Action: Farm Assurance Schemes

Timescale: To be reviewed annually

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G	Х						
SQC	Х						
QMS	Х						
Red Tractor	Х						
RSPCA				Х			

WLBP				Х	
Soil Association				Х	
LMC NI				Х	
SEDEX				Х	
LEAF				Х	
BEIC	Х				

OF&G noted that all schemes are centred on good practice - and that is the basis of any audit.

SQC already undertakes a review of standards on an annual basis. SQC agreed the proposal that the demands placed on various parts of the supply chain represented in the farm assurance scheme should remain balanced. Any additional farm assurance costs arising from new or enhanced standards should be shared across the food chain on an equitable basis.

When industry asked for consideration to be given by SQC to increase sustainability standards, via the SAI Platform, from silver to gold status, SQC paid for a benchmarking of current "silver" requirements against a move to "gold". This allowed it to look at what would be additionally required from farmers to maintain their assurance. It was recognised that the move was not feasible for all. However, in undertaking this exercise, an opportunity arose to encourage a "premium" for farmers who may already be achieving the gold standard/or who could do so at their own discretion. This has resulted in SQC providing baseline assurance for a group of farmers/distillers who are now working together and have their own unaccredited standards to enhance sustainability measures – and the farmers are being assisted to undertake this.

The **Red Tractor** Board reported that it will consult with the UKFAR Commissioners and sector boards to consider how best to meet this recommendation.

WLBP agreed that farm assurance schemes will need to evolve, and periodic reviews may be helpful to achieve this evolution. However, it does not support an annual cycle, but would accept that a more detailed review process every three years, for example, would be more meaningful.

BEIC noted that the combination of the whole supply chain (excluding retail) being represented in Lion Code of Practice discussions on governance procedures ensures that this is regularly discussed and covered.

Recommendation 3.05: Using impact assessments (page 97)

The publication of an impact assessment for either the creation or removal of a farm standard must become a matter of course for each farm assurance scheme. In this way, the origin and rationale behind the standard/removal of the standard, and the way in which the farming industry has been consulted about this change can be publicly reported. This will help improve communication and levels of trust between the relevant scheme and its members.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G	Х						
SQC				Х			
QMS	Х						
Red Tractor	Х						
RSPCA				Х			
WLBP				Х			

	1	2	3	4	5	6	7
Soil Association	Х						
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC					Х		

OF&G believes that certification bodies should be told what to do about this point - and not consulted with. They think that there are still too many unnecessary audit questions that do not need to be asked.

SQC noted that it already has a robust consultation process, where engagement is undertaken when looking at any substantive change to the SQC standards. Despite not publishing an impact report, it felt it adequately consults and communicates any changes - and the reasons why they have been made - to those who will be impacted. It also produces an annual document outlining any changes made to standards from one year to the next. They may consider extending this, to include a brief outline of why the change has been necessary. Should a new standard be implemented, full consultation has already taken place and SQC assessors are fully trained in any change to ensure they have a full understanding, so it is not felt necessary to provide more documents for farmers to read.

QMS noted that this was one of the changes implemented following the 2022 governance review of quality assurance, with a "what's changing and why" rationale document produced as part of the member consultation exercise. This was to give an easy way to identify the "why" behind changes and the factors taken into consideration.

Red Tractor noted that it will consult with sector boards on a new RT policy for standards and take this recommendation into account.

The development of standards is reviewed in each cycle by the **RSPCA** (Science Group), from a perspective of continuous improvement. However, this is an element that can feed into ongoing work to support the RSPCA Science Group to further improve how industry is engaged in standards development.

WLBP noted that when standard changes occur or need consulting on, it is done by consultation with industry representatives and explanations are given for the rationale for the changes. The rationale for all scheme standards is also incorporated in the producer scheme manual. It felt that conducting an impact assessment of each standard change would create added cost and delay to the process.

The **Soil Association** noted that the standards development and consultation process that they use follows this approach.

BEIC is satisfied that its governance and feedback structures cover the whole industry and therefore wide-ranging discussions are held before a standard is approved or removed. BEIC does not believe that the publication of an impact assessment will add any further value to the processes currently in place.

Recommendation 3.06: A "federation" of farm assurance schemes (page 97)

Farm assurance schemes should reflect on the need to establish a loose "federation" of farm assurance schemes which can act as a locus for knowledge transfer/thought leadership/best practice in the operation and development of the UK's farm assurance system.

The federation would not be a new body, but a forum for agreeing common approaches to farm assurance across the UK. The secretariat for the federation should rotate between different schemes on an annual basis. Other governance arrangements for such a federation would need to ensure that no single farm assurance scheme would predominate and that the objective would be to support the farming industry, and wider food chain, in maintaining high standards in farm assurance to enable the UK to continue to compete in international food markets.

Action: Farm Assurance Schemes

Timescale: 2 years

	1	2	3	4	5	6	7
FA Schemes							Х

Early discussions have been reported, but there is no formal response at this stage.

In response to Strategic Recommendation 3, **LEAF** reported that the LEAF Marque's Standard Consultations; Working Groups; and Technical Advisory Committee are already farmer focussed, but it continues to ensure this is embedded in LEAF values and future work. Its Technical Advisory Committee, which reviews and approves the controls within the LEAF Marque standard is chaired by the Managing Director of Home Farm Nacton.

Strategic Recommendation 4: A new industry-led initiative must set out the future environmental ambitions for farm assurance, establishing this as an area of competitive advantage for UK farming.

Recommendation 4.01: Developing acceptable environmental standards (page 99)

The Red Tractor scheme has made clear that it will not revisit the Greener Farms Commitment (or its successor) unless and until the farming industry asks it to do so. Other schemes will be progressing their own environmental standards, in consultation with their respective members. In these circumstances, there is no firm leadership around the issue of establishing a consistent framework for environmental standards that can act as a guide for farm businesses. Nor is there clarity around how emerging legislation, with which the farming industry will be expected to comply, will be incorporated in farm assurance, other than in a very fragmented way.

This issue must therefore be taken out of the hands of the farm assurance system and addressed by farming representatives, working with the relevant regulators, to provide a "foresight" style approach to the conversion of environmental legal expectations into a code for use by farm assurance providers and farm businesses.

This process will require the respective central and devolved government ministries and their agencies, to work with the industry to establish as common a framework as possible, so that anomalies will not be "baked into" farm assurance standards in different parts of the UK. To begin this process, the AHDB/NFUs must clearly articulate what is currently required by each of the 7 industry sectors to be legally compliant with current environmental legislation and conduct a gap analysis of methods for compliance and requirements of emerging/anticipated legislation for discussion with the ministries and their agencies.

Action: The AHDB, NFUs, Government Ministries and relevant agencies

Timescale: 6 months

	1	2	3	4	5	6	7
AHDB			Х				
EA						Х	
Natural Resources Wales						Х	
FSA						Х	
Welsh Gov			Х				

A summary of direct environmental legislation by sectors in which the **AHDB** is mandated (cereals and oilseeds, pork, dairy, beef and lamb) and country (England, Wales, NI, Scotland) has been circulated

to farm assurance schemes and will be refined further during the next FAS roundtable to be held in September.

The second part of this recommendation involves discussions with Government and regulators, to identify where compliance is poor (i.e. current gaps) so that methods of compliance can be identified and promulgated within the industry. This is a substantial piece of work. There remains a question about how and who is best to do that. The **NFU** and the **AHDB** are discussing options.

The **Environment Agency** reported that its inspection funding has doubled, but that the additional resources will support follow-ups and enforcement, not just inspections.

Natural Resources Wales (NRW) noted that the WG sets the regulatory environmental framework in Wales. It is for the farm assurance schemes themselves to decide which to include with their standards. Farm assurance schemes stating they are "assuring environmental protection" should include the relevant environmental legislation and assess to an appropriate level. Natural Resources Wales, as the enforcing body would be happy to work with the AHDB/NFU to take forward this recommendation but to date has had no contact relating to this action.

The **Welsh Government (WG)** noted that providing greater clarity about environmental standards for farm assurance is an area of interest. The initial action is for farming unions to engage with Government. The WG ambition is to engage all stakeholders to be compliant with this recommendation.

Recommendation 4.02: How can farmers implement environmental standards (page 99)

In taking the above approach, there must be clear and regular communication with farm businesses about the steps they can take to meet the necessary environmental legislative baseline and any agreed farm assurance standards related to that baseline. This should be based on a menu of options for farming businesses to adopt, so that a "one size fits all" approach for farm businesses is avoided.

Action: The AHDB and NFUs

Timescale: 9 months

	1	2	3	4	5	6	7
NFU		Х					
NFU Scotland			Х				
NFU Wales		Х					
UFU				Х			
AHDB			Х				

NFU sector boards will help to shape an outcome fit for the differing sector requirements, while keeping in mind that this must demonstrate value for all in the form of premiums, market access, reducing audits or similar – as a result this will look different in different sectors and farm assurance schemes. In addition to being different by sector, it will also vary by environmental issue and devolved nation. In particular, the livestock board has engaged very positively with this activity. Baselining and good environmental outcomes are a key part of NFU policy and there are many workstreams that cross into this area.

The extensive "Agricultural Transition Plan" will involve:

- gap analysis (funding shortfalls and risks to environmental delivery)
- supply chain analysis (reviewing the various initiatives and voluntary commitments made by retailers that impact their producers and supply chains)
- leadership in production of sector sustainability resilience plans and 'roadmaps'

- working closely with supply chain stakeholders to ensure that their plans, the language used and the outcomes they seek are compatible with Recommendation 4.02 (including working closely with supply chain organisations, such as the IGD and WRAP)
- working very closely with the AHDB on both the development and delivery of environmental standards (this is being shaped by input from the farm assurance schemes roundtable group) and observing that different markets are seeing differing environmental requirements from their supply chain to support both Scope 3 reporting and other measures that support their "brand" or point of difference

NFU Scotland is currently developing a new strategic communications strategy and planning to incorporate key messages around environmental standards into this. It is currently carrying out a scoping exercise considering retailer requirements and environmental "bolt-ons" This is shaping up to be a major piece of work and it is considering how best to progress this.

The majority view of **NFU Wales** members, when consulted on the UKFAR, was that farm assurance should not be concerned with policy areas, such as environment, beyond ensuring compliance with the regulatory baseline. There were concerns expressed that if such areas became a part of "assurance" that it could limit the ability of farmers to derive value, financial or otherwise, from their environmental assets (for example their carbon footprint) and it could duplicate or undermine existing supply chain initiatives.

The **AHDB** noted that this work will follow on from delivery of Recommendation 4.1 and will be informed by environmental baselining work in the spring of 2026. This is a substantial piece of work. There remains a question about how and who is best to do it. The NFU and the AHDB are discussing options.

The **UFU** recognises that a "one size fits all" approach is not viable. It is helping to drive the conversation to define what "good" looks like by sector, ensuring any new environmental standards are practical for producers and demonstrate tangible value for them. For example, some sectors are reviewing standard revisions, with a move toward risk-based essentials, but it is noted that this must result in real benefits for producers. The implementation of environmental standards must be tailored to the specific needs of each sector, given the varied requirements and the international nature of many businesses. The end goal is to provide a menu of options that can be implemented on-farm and that ultimately translate to market premiums or a reduced regulatory burden, such as reducing the need for multiple audits.

Feedback from the **LMCNI** in collaboration with the **Ulster Farmers Union** included some important opinions on the changing landscape of farming in Northern Ireland. In the context of the UKFAR, it was considered important to recognise the farming and political landscape of each UK nation. Each devolved nation has its own governmental priorities, and changes are progressed in different nations at a different pace. Northern Ireland is also working under some different regimes due to the Windsor Framework arrangements. In Northern Ireland there is a changing landscape of agri-food policy with an increased focus on sustainability. Changes to farm support will be implemented through DAERA's Sustainable Agriculture Programme (SAP).

DAERA has been developing a co-designed farm carbon foot printing project for Northern Ireland which will provide all farm businesses with a whole farm baseline carbon footprint. The Nutrients Action Programme (NAP) provides several measures to improve the use of agricultural nutrients on farms and reduce their impact on Northern Ireland's water environment. The NAP is now being revised for 2026 - 2029 and will bring some considerable challenges to the NI beef and sheep industry.

Recommendation 4.03: Rewarding the use of environmental standards (page 99)

If businesses elsewhere in the food chain wish to see enhanced environmental or animal welfare standards (above the legal baseline) to help meet their public reporting requirements or to differentiate their position in the market, this must be accompanied by a clearly identified premium paid to the farm business for the collection of the necessary data, the implementation of different farming practices or the adoption of new technologies to enhance animal welfare and/or environmental protection.

This will recognise the benefit to the food chain business in delivering enhanced environmental and welfare standards, whilst also compensating the farm business for any additional work required and for the use of farm data associated with these additional standards.

Food chain businesses must report publicly on the steps they have taken to implement this recommendation to provide assurance to the farming industry, and to their customer base, that farm businesses are being, and will continue to be, adequately compensated for the additional work required to comply with enhanced farm assurance standards.

Action: Food chain businesses beyond the farm gate

Timescale: 12 months

	1	2	3	4	5	6	7
Barbers Cheese	Х						
M&S	Х						
Cranswick	Х						
Dairy UK				Х			
Anglia Free Range Eggs			Х				
Morrisons	X						
ABP	Х						
British Sugar	Х						
Lidl	Х						
Со-ор						Х	
Arla	Х						
UK Flour Millers			Х				
AIC						Х	

Barbers Cheese has worked closely with its farmers to establish several propositions as follows:

- grass fed an average of 200 days for cows
- custodianship of the countryside annual collation of data from all farms, on areas of biodiversity, hedgerows, habitat, use of regenerative farming etc. All farmers have supplied data for a 4th year, with continual improvement, and bespoke support provided to each farm
- GHG measurement and management, as 90% of Scope 1, 2 & 3 emissions are generated from livestock in dairy products. It has invested in focusing on farm level, which is improving GHG emissions and the farmer's bottom line and resilience
- removal of soya in all diets, as straights, in concentrates and blends
- antimicrobial reporting data is sourced from farm vets now in the 6th year of operation

M&S has a long-standing position of having a differentiated product offer, driven by M&S Select Farm standards. These standards stipulate the production requirements associated with animal welfare, nature & environment considerations, and people and community aspects. The M&S pricing system with suppliers is based on competitive delivery of these needs, as part of M&S's terms of trade with suppliers. Where innovation is being trialled, it has a track record for paying farmers to participate; where new requirements are required to existing contracts, it negotiates new terms for adoption.

Cranswick has aligned retail supply chains within their pig supply chain. Some of these retailers are paying a premium to the producers, via a dynamic contract and scoring mechanism for such information and providing financial support to improve welfare.

As a trade body, **Dairy UK** cannot instruct its members to put in place an environmental premium. However, it has taken the lead in restructuring the governance of the Dairy Roadmap to broaden representation of the supply chain and provide a stronger foundation for the Dairy Roadmap to remain the lead industry initiative for improving the sector's environmental performance.

Anglia Free Range Eggs felt it was not easy to select an appropriate option to assess its progress. Producers supplying Anglia and its retail customers are all required to be Lion & RSPCA assured egg producers. Free range eggs command a premium above colony cage and barn eggs, which in the main will be the legal standard, plus Lion, but there is little knowledge of the bottom tier suppliers and it can only be assumed producers supplying with these accreditations will be paid more.

Anglia Free Range Egg producers are paid for RSPCA producer membership, and the Lion registration is paid by the packer. As part of their Tesco supply, the producers benefit from a feed tracker mechanism, which takes some of the volatility out of feed prices. Changes to the RSPCA standards will increase compliance costs, with modifications required, but discussions are ongoing with RSPCA and in the groups working with the RSPCA on behalf of retail customers and producers. At present, there is no real definition of environmental standards over and above the legal minimum, other than Lion encouraging farmers to carry out carbon footprint exercises.

Morrisons noted that retailers have made targets for sustainable soya, but these requirements will be superseded by legislation changes, whenever this happens. It is, though, up to each business how to compensate farms in their supply chain. A straight premium is not always appropriate where supply chains are shared, or where the time spent may be rewarded in other ways (including free access to systems, advice and consultancy to improve farm businesses). Morrisons noted that it was compliant, but that it would be wrong to say that this only equates to additional p/kg.

ABP has various programmes with its farming supply base (some of which are backed and supported by retailers) that provide certainty and security for livestock farmers. Several of these involve undertaking additional environmental requirements, which are factored into payments and pricing. Additionally, it has a broader ABP specific environmental initiative called PRISM, which has undertaken carbon foot printing activities covering around 20% of livestock numbers. This has been fully funded by ABP and includes bespoke advice provided by Andersons Consulting and Harper Adams University, at no cost to the farmer. The farmer can also access free grant monies to enable improvement.

British Sugar noted that it is currently fully compliant with this recommendation. In future, it knows that it is important to acknowledge that enhanced environmental standards are increasingly becoming part of "business as usual". Market expectations, regulatory requirements, and customer Environmental, Social, and Governance (ESG) commitments mean that as well as the benefits to the environment and biodiversity, these standards are now integral to maintaining a licence to operate, not optional extras — and expectations will only continue to grow over time.

Importantly, the legal baseline is evolving, with mandatory reporting frameworks such as UK SRS, the Corporate Sustainability Reporting Directive (CSRD), the Environment Act, Biodiversity 30x30, and Net Zero commitments creating new minimum requirements that all businesses must meet. By anticipating this direction of travel and working together across the supply chain, British Sugar plans to ensure progress is both manageable and fair.

In the current trading environment, where both farm businesses and processors face significant financial pressures, there is a concern that there simply is not additional money in the system. Any premiums can incentivise change in the short term, but they also risk creating dependency and are unlikely to provide a long-term solution - as seen recently, with the loss of SFI payments. This raises a broader question of how enhanced standards and reporting should be funded: whether through government support, private finance, or shared investment across the supply chain. Whatever the funding model, the critical factor will be that investment can only be justified where good, reliable, and independently accredited data is provided to evidence that outcomes are real, recognised, and verifiable for both farm businesses and the wider food chain.

Looking ahead, as mandatory reporting and regulation continue to raise the baseline, a more aligned and collaborative approach across the supply chain will be essential. By embedding higher

environmental standards into everyday practice, supported by efficiency gains, shared investment, and collective accountability, **British Sugar** felt that it can deliver meaningful progress that is fair, resilient, and not dependent on premiums alone.

Lidl noted that it already pays farmers fairly for compliance beyond the Red Tractor core standard – a good example being the lower stocking density of its fresh chicken.

The **Co-op** felt it was difficult to give an answer to this question, because it is quite complicated. It is financially supporting sustainability efforts on farm; however, it also reiterated that not all come at a financial cost. Some sustainability requirements can be along the lines of improving the efficiency and profitability of the farm.

Arla pointed out that its farmers are incentivised for completing sustainability data and have points awarded for various compliance criteria, which is linked to the milk price they achieve.

UK Flour Millers is participating in the review of the Red Tractor Combinable Crops Standards. It is crucial that suppliers can demonstrate they meet legal obligations regarding environmental protection. There exists in the marketplace already schemes that require enhanced environmental performance, which are optional and are required by some businesses and met by the farmers that choose to supply those businesses.

While the **Agricultural Industries Confederation** (AIC) acknowledges the importance of supporting higher animal welfare and environmental standards, it is essential to clarify how this should be achieved in practice. The AIC cannot mandate its members to pay a premium for commodities, if such a premium is not recognised or available in the marketplace. Pricing is determined by supply and demand, and ultimately it is up to the market to decide what it will or will not pay for a premium. Equally, it is for the farmer to determine the value of their product and to negotiate accordingly.

AIC fully recognises the need for good animal welfare and environmental outcomes, but much of this is already dictated by government legislation designed to meet global and national standards. Where businesses in the food chain wish to impose requirements above this legal baseline, the onus is on them to engage directly with their supply base and to agree a suitable framework, including the question of premiums. All businesses within the supply chain are responsible for delivering a resilient UK agriculture and food system as detailed in the AIC's "Agri-supply: An action plan for sustainable efficiency".

Recommendation 4.04: Telling the wider world what farming delivers for the environment (page 100)

Farm assurance schemes, in conjunction with the NFUs and the AHDB, must collaborate to develop and implement a communications/PR plan for the wider public to highlight farming practices that are helping to deliver enhanced environmental standards. It is recognised that this approach may not be as straightforward when addressing animal welfare standards, because of the position towards UK farming taken by some animal welfare organisations. Consideration should, nonetheless, be given to highlighting good practice in farm animal welfare to better inform and allay potential concerns in the public about UK farming standards.

Action: Farm Assurance Schemes

Timescale: 12 months

	1	2	3	4	5	6	7
Global GAP					Х		
OF&G				Х			
SQC					Х		
QMS	Х						
Red Tractor				Х			
RSPCA			Х				

WLBP			Х		
Soil Association			Х		
LMC NI				Х	
SEDEX				X	
LEAF				X	
BEIC				X	
AHDB	X				

OF&G noted that this activity should increase confidence, improve quality and output and should command a premium. It is not a base standard which penalises the UK against other countries with lesser standards.

SQC believed that responsibility for this action must also be placed with the farming unions and the AHDB. SQC feels that each individual farm assurance scheme has a responsibility to provide full transparency in relation to what they do, which they implement via their current level of communications. SQC prides itself on its relationships with NFUS and the AHDB. However, it feels that additional support could greatly benefit the understanding of SQC in terms of "who it is, what it does (and what it does not do) and why it does it". It is appreciated that the farming unions and AHDB cover all sectors within the agricultural industry, but more could be done by them to help educate and share specific messaging. SQC would like to see more of a collaborative approach, rather than feeling that it is always having to defend what it does. To that end, SQC would be willing to collaborate with the farming unions and the AHDB to share messaging on good farming practices and what (arable) farming delivers for the environment – but it does not believe that it is the sole responsibility of the farm assurance schemes.

SQC also feels that there is a need for wider understanding on the differences between farm assurance schemes (as the owner); CB's (as those who deliver audits and certification on behalf of the scheme); and lobbying organisations (e.g. the farming unions; and levy boards or marketing organisations).

As part of the **QMS** restructure in 2023, a greater emphasis was placed on two key things related to this recommendation. Firstly, as part of the organisational restructure, it brought in a Brands Integrity Team who run the QA schemes, together with its Marketing Team, to directly link up its standards with marketing messages. Without quality assurance, it is clear that it would be in a weaker position to market the Scottish brand, however it is important to make sure that any marketing is evidence based and linked to consumer and customer outcomes. It also invested in its reputational function, as part of the restructured approach to communications, appointing a Reputation Manager whose role it is to tell the positive story of red meat production in Scotland, both above the line through effective media storytelling, and below the line, through targeted community engagement across Scotland. A core element of the environmental element of this reputational building work is the QMS/AHDB baselining project which is designed to gather evidence on farming businesses total balance sheet.

Red Tractor noted that it will consult with sector boards and other stakeholders once requested to be involved in communicating enhanced environmental standards to the wider public by NFUs, the AHDB and wider farming and food chain stakeholders. RT said it will continue to highlight good practice in farm animal welfare and food production to the public, through consumer marketing campaigns. However, Red Tractor does not set environmental standards, so cannot promote these claims.

Telling the story of what **RSPCA** members do to improve animal welfare is very much a part of its strategic goals. In terms of collaboration, this is something RSPCA have done in the past with its supply chain partners and it will continue to do so. It felt this is an important topic for the "federation of assurance schemes" mentioned in Recommendation 6.03.

WLBP noted that this is a longer-term proposition but had no target date for it. WLBP is already considering what this could entail, and has, during 2025, piloted GHG emissions measurements with its members and 3 sheep and beef farms. This work is also being delivered in the dairy sector.

The **Soil Association** reported that the benefits of organic standards and certification are regularly communicated. It has also proactively worked to develop the use of Welfare Outcomes Assessment in farm assurance schemes.

The **BEIC/Lion Code of Practice** is principally a food safety scheme and therefore it believed that this section does not feel relevant, albeit BEIC is involved in the industry groups discussing this and other matters. However, it has updated existing, and included new relevant, standards designed to protect the environment. The BEIC represents the egg industry on several environmental matters and collaborates with others, where necessary to highlight achievements or areas of concern. This is, however, a difficult area to navigate given the level of NGO activity in the UK on the environment. BEIC will therefore be responsible for managing the industry's communication plans in this area.

Results from the **AHDB's** environmental baselining project, anticipated in the spring of 2026, will provide further valuable evidence of the environmental benefits delivered by farming and will help inform relevant communications to the public. The AHDB's consumer facing campaigns, such as "Let's Eat Balanced", already employ environmental and welfare messaging and will be strengthened further by evidence from the baselining project. It will continue to have conversations with other organisations to refine the use of evidence and messaging.

LMCNI is working on the facilitation of carbon data collection via the NIBLFQAS. The detail is to be finalised prior to the official launch of this programme; however, it is planned that an IT/CRM database will be integrated with any carbon data collection.

Recommendation 4.05: A "foresight" exercise on future environmental standards (page 100)

Farm assurance schemes must work with the whole food supply chain to look at emerging trends to help the food sector be current and less defensive on environmental issues. The UKFAR proposed a further "foresight" exercise to begin this process. It will be necessary to continue to monitor the UK's farming performance on environmental standards and to benchmark this performance against competitor farming nations and international farm assurance standards. The review process must be driven from the perspective of farming businesses, taking longer term changes in environmental regulations as a baseline, whilst continuing to enable farms to determine how they will meet new standards from a menu of sector-appropriate farming measures.

Action: Farm Assurance Schemes, with farming and food chain industry representatives

Timescale: 2 years

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G		Х					
SQC			Х				
QMS	Х						
Red Tractor						Х	
RSPCA				Х			
WLBP			Х				
Soil Association					Х		
Agri Audit	Х						
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
Barbers Cheese	Х						
M&S		Х					
Cranswick	Х						
Dairy UK				Х			
Anglia Free Range Eggs			Х				

Morrisons				X	
ABP			Х		
British Sugar				Х	
Lidl		Х			
Со-ор				Х	
Arla	Х				
UK Flour Millers				Х	
AIC				X	

OF&G felt it important not to decouple environmental issues and agricultural output, noting that these can be completed together but not at each other's expense. Farm assurance could help identify and deliver this. A good regenerative scheme, professionally delivered by independent experts, could also support this.

Given the current focus on environmental and sustainability elements, **SQC** believes that there is a clear need for this to be looked at in more depth. SQC will engage with industry as required to progress. SQC also believes that industry representatives must consider the views of the supply chain and buyers of grain to ensure that their requirements are met.

SQC is interested in how this will be developed and how it can be built into the current farm assurance schemes – or be separate – where it may still be deliverable as part of a multi-audit but not incorporated into current schemes which could then create a large amount of additional work for scheme owners.

Over the last 3 years, it has had to spend significant time working to ensure it retains Renewable Energy Directive (RED) recognition, thus providing ongoing access to the European biofuels market for Scottish growers. In having RED as part of the SQC Standards, it undergoes additional assessment every time the EU makes any changes to its Directive – in theory, having to undergo additional standards setting process work and consultation. SQC has recognised that this approach creates additional work for the scheme, its Board and its members.

QMS believes this is something it already does, through benchmarking and horizon scanning to ensure future needs are considered as part of the standards setting process.

By necessity, **Red Tractor** felt this will be built upon Recommendation 4.1, hence it will await a steer from the AHDB and the farming unions, upon which it will consult with sector boards and other stakeholders. Environmental standards are seen as one of the most pressing issues for farming businesses, and yet assurance schemes often feel reactive to it, rather than forward-looking. Too often, new requirements are introduced at short notice, leaving farmers scrambling to comply, instead of being supported with a longer-term view of what is coming and how best to prepare.

AgriAudit commented that the call for a foresight exercise is welcome. Farmers need assurance schemes to engage with the whole food chain and anticipate emerging trends, so that the industry can respond confidently, rather than defensively. Benchmarking UK standards against those of competitor nations would also provide much-needed context and help ensure that UK farmers are competing on a fair and informed basis. From the farmer's perspective, it is also essential that environmental standards are applied with flexibility. A "menu of measures" approach, where farms can choose the practices most appropriate to their sector, scale, and system, would make new requirements more practical and achievable. Schemes must recognise that "one-size-fits-all" environmental compliance is rarely effective.

One of **WLBP's** objectives is to facilitate market opportunity for its farmer members. Current trends support the need for GHG emission data to evidence environmental requirements. WLBP is evaluating this requirement through the delivery of a working pilot project.

M&S supports this approach and the urgent need to help UK farms demonstrate their leadership globally in managing complex farming businesses with nature and environmental considerations in mind.

Cranswick has been carbon foot printing both its pork and poultry supply chains since 2017 and is now doing full life cycle analysis (LCA) exercise too. It has clear plans to achieve NetZero for livestock across its own farming operations in partnership with retail customers.

Dairy UK feels that all agricultural sectors need to have a clear understanding of the sustainability challenges that they must address. As part of its investment in the Dairy Roadmap, the sector has commissioned a Pathways Report from Scotland's Rural College (SRUC) that will examine in detail the options open to farmers to achieve sustainability goals in the medium and long-term. This will go a long way to addressing this recommendation.

Anglia Free Range Eggs noted that the Lion Code has established an environmental group taken from across the supply base, with the aim to drive the requirements from the sector in a practical way, but also note that it lacks resource and finance to do this and so progress is slow. The initial aim is to assist farms with legal compliance, but it also recognises the need to develop this area which will take time. A mechanism for monitoring & measuring performance across the supply base will be required.

Morrisons agrees that farm assurance schemes need to consider the farmers delivering them, but they are there to assure standards for consumers and for businesses selling food to help evidence this versus other schemes. Morrisons believes this element is missing from the Recommendation.

ABP agrees with the objective and need to be proactive on environmental issues and so has company specific activities that are underway in this area, in the absence of any broader national framework or activity. In its opinion, there are others better placed to lead on this activity (e.g. The AHDB with whole chain support, including farm assurance schemes). Through the AHDB and others, ABP will continue as an organisation to support the baselining work, the Farm Data Exchange Pilot and wider environmental progression.

British Sugar noted that it understands Red Tractor's focus has been on shorter term priorities from the UKFAR. As a processor it would engage in this exercise via the Red Tractor sector board (Combinable Crops & Sugar Beet) at the appropriate time.

Lidl has not started a foresight exercise with the wider industry, but would be willing to support this industry move if and where it can. Lidl supports this by extension of its BRC position on the one of the sector boards. Lidl also commented that it is not aware of any such exercise being arranged to date.

Arla reviews its requirements for environmental standards on a regular basis across all the Arla business areas (i.e. in the EU, as well as the UK). They have "the planet" as one of the focuses and, of course, meeting the expectations of customers and consumers.

UK Flour Millers have not conducted a "foresight" exercise on future environmental standards. This will need to be done with cross-supply chain stakeholders and government, as standard development will depend on upcoming regulatory changes relevant to environmental protection.

AIC welcomes the opportunity for further discussion on how farm assurance schemes and the wider supply chain can better anticipate and respond to emerging environmental trends. It recognises the value of benchmarking UK farming performance against international standards and competitor nations and agrees that long-term regulatory changes must be considered as a baseline for progress.

However, AIC noted that, to date, no formal approach has been made to initiate such an exercise with the organisation. It remains open to constructive engagement. They would be willing to explore how this type of review could be structured in collaboration with farming businesses and the wider food chain. It is key that the whole supply chain is involved in the development of environmental standards and their requirements to ensure the UK remains in line with international standards and emerging trends.

It also noted that the review process cannot solely be driven from a farming perspective. Changes to environmental regulations need to consult the farming sector, but are also influenced by other government departments as well as seed companies, the supply chain and ultimately the end consumer.

In response to Strategic Recommendation 4, **LEAF** noted that environmental ambitions remain the sole focus of LEAF Marque. Its goal is to promote the understanding of environmental controls in the context of promoting overall business resilience and societal engagement, as mechanisms to improve efficiency and build public trust.

Strategic Recommendation 5: The inclusion of regulatory requirements within farm assurance standards and audits should be conditional on government and regulators agreeing a form of 'earned recognition'

Recommendation 5.01: Creating points of contact in government departments (page 101)

There is no clear principal point of contact for farm assurance within government departments. They should address this as a matter of urgency, to ensure that governments across the UK are taking a more strategic view of how and when assurance schemes should feature as part of the regulatory landscape.

We anticipate that responsibility for engagement with farm assurance schemes, the development of relevant policies (such as "earned recognition") and coordination with regulatory agencies using farm assurance accreditation would form part of these roles. The assignment of these responsibilities would also enable greater coordination to take place between central and devolved governments, and with the farming industry, on the future landscape for farm assurance and the maintenance of standards to enable the UK to compete in international markets.

Action: Government departments

Timescale: 6 months

	1	2	3	4	5	6	7
Natural						Х	
Resources Wales							
FSA	X						
Welsh Govt	Х						
DEFRA							X
DAERA							Х
Scottish							Х
Government							

The **Food Standards Agency** made the following points:

- it is already compliant on the point of contact for farm assurance within government departments.
 The Regulatory Standards & Industry Assurance team provides a single point of contact for Earned
 Recognition (ER) at the FSA and shared mailboxes are used for the English, Welsh and Northern
 Irish FSA approved assurance schemes. There is similar single point of contact arrangements for
 schemes that only operate in Wales through the Local Authority Partnerships team in FSA in Wales
- in terms of the definition of how and when assurance schemes feature as part of the regulatory landscape, FSA Approved Assurance started in 2006. Earned recognition means that reduced inspection frequencies can be granted to compliant businesses who are members of FSA approved assurance schemes (AAS) in the areas of primary production, dairy hygiene, and animal feed. When the FSA is satisfied that an assurance scheme meets the approval criteria for earned recognition, it will approve the scheme and agree a Memorandum of Understanding (MoU) along with an appropriate data sharing agreement (DSA). There are clear points of contact for the FSA in these documents which are published on its website
- with regard to greater coordination of regulatory agencies using farm assurance accreditation, the FSA has recently reached out to DEFRA to collaborate, share good practice in the earned

recognition policy area and invite them to engagement events. FSA also facilitated an introduction between DEFRA and some of its key AAS contacts

- last year, FSA extended the membership of its Earned Recognition Policy Group (ERPG) that meets
 quarterly to ensure better coordination between stakeholders with oversight of AAS. The Veterinary
 Medicines Directorate (VMD) and Food Standards Scotland (FSS) now also attend. This facilitates
 greater engagement and will provide a forum for robust scrutiny of earned recognition policies and
 greater intelligence sharing
- a series of engagement events have taken place with representation from the three nations to develop new, and build upon, existing relationships to ensure that there is confidence across the sector in AAS. Most recently, the FSA attended a face-to-face meeting with the National Agricultural Panel (NAP) in June. This includes representation from local authorities in England, Wales and Northern Ireland
- NAP works in partnership with National Trading Standards (NTS), the Association of Chief Trading Standards Officers (ACTSO), local authority officers and government departments such as the FSA. NAP meets quarterly and is aligned with the National Animal Feed at Ports Panel. It works with industry stakeholders and other relevant bodies providing support and guidance to safeguard public health by ensuring the safety and quality of animal feed

At this meeting, it was agreed that lead feed officers and NAP representatives would attend a series of focus groups to discuss earned recognition related issues and drive forward continuous improvements. NAP members also presented to **Red Tractor** who attended the meeting on ways in which its notifications could be improved to share more intelligence. This work is ongoing, and further sessions are arranged throughout the autumn. These will promote the benefits of earned recognition policy within the farm assurance and food and feed regulatory landscape and provide delivery insight to drive forward further improvements.

A Head of Farm Assurance and Food Certification role has been created within **Welsh Government (WG)**. The role will take a strategic view on farm assurance, engaging public and private sector interests, and will provide a co-ordination role on assurances/certification schemes throughout the food chain in Wales. The Office of the Chief Veterinary Officer (OCVO) policy in Wales has a focus on healthy and productive animals in Wales, with a good quality of life. As such, the WG has regular and close interaction and collaborative working with key stakeholders such as Welsh Lamb and Beef Producers who administer the FAWL scheme.

Recommendation 5.02: Consistency of regulatory use of farm assurance (page 101)

There are a variety of ways in which government departments and agencies employ farm assurance, ranging from the concept of "earned recognition" resulting in reduced inspections from an agency, or a laissez-faire approach. This is where farm assurance has been outsourced to private providers and left to "the market", to the engagement by a devolved government department in the co-development of farm support systems involving the industry and a farm assurance scheme.

This patchwork approach to the use of farm assurance in the regulatory environment is no longer viable. A more strategic view is required, where the respective government departments, and their agencies, must determine how, and when, they expect to use farm assurance in their regulatory systems, and a consistent approach to its use is negotiated and agreed with farm assurance schemes and relevant industry bodies. An early part of these negotiations should be to properly define the term "earned recognition" so that the concept is employed consistently across the farm assurance landscape.

Action: Government departments, regulatory agencies and NFUs

Timescale: 9 months

	1	2	3	4	5	6	7
NFU			Х				
NFU Scotland			Х				

NFU Wales	X				
UFU			X		
Natural Resources Wales				Х	
FSA	X				
Welsh Government		Х			

The **NFU** has reached out to DEFRA, the EA, the FSA and Trading Standards to understand more about their view of earned recognition. The NFU's view is that earned recognition should not just be about doing the regulators' job for them, but it should be about adding value to all.

The **NFU's** trade and business strategy team is leading work exploring the scope for regulatory change and took a "green paper" to the main policy making board in July to explore the role of regulators, regulatory principles, outcome-based regulation, areas for regulatory change, compliance, and the role of earned recognition and how it relates to farm assurance.

On the final point, discussion at the board noted that good performance should be used more frequently and transparently by regulators to target activity, and the recent Corry Report¹³ which recommends giving those with good track records more autonomy through the use of a Memorandum of Understanding (MoU) and "class licences". This could be broadened to include earned recognition for participants in farm assurance schemes. The NFU is continuing to explore all these opportunities with schemes and regulators, though notes that progress with DEFRA in discussing this has been slower than hoped.

The **NFU** is also aware that consistency of application by sector and devolved nation can be an issue and is undertaking work to explore this further. It noted that **Red Tractor** delivers some degree of earned recognition (such as reducing the need for dairy hygiene inspections) but are also aware that, for some, earned recognition (such as contaminants in crops for regulators, like the FSA), the value is perhaps not being adequately reported to assurance scheme members. Finally, the combinable crops board is particularly active in comparing legislative baselines and exploring those areas where additional standards would offer added value or earned recognition.

NFU Scotland stated that earned recognition is an area that has been discussed at the UKFAR leadership group. This is an area which needs further exploration, and NFUS is willing to be a part of this work. It has initiated discussions with Scotlish Government officials to highlight the review and the importance of considering how this aligns with policymaking around environmental regulation. It has also initiated regular scheduled dialogue with QMS and SQC, to discuss ongoing UKFAR and to understand their direction of travel.

The **UFU** welcomed a more strategic view on the use of farm assurance by government and regulatory bodies. Its view is that earned recognition should provide a tangible benefit to the farmer, not just do the regulator's job for them. It is actively engaged in conversations with government departments and regulators to help them understand how schemes can be used more effectively to demonstrate compliance and reduce risk. It is believed that there is a significant opportunity to better define earned recognition in a way that provides clear benefits for producers, resulting in a more efficient regulatory landscape and with less duplication of effort. It is working with the NFUs and other schemes to highlight the overlaps in audit and regulatory inspection requirements and properly define the concept, so that it provides a tangible benefit to producers and is not just a 'tick-box' exercise.

NFU Wales noted that earned recognition is about using third party schemes to assess risk, thereby reducing the need and frequency for the state or its agencies to inspect. This is in the context of respecting also that, ultimately, membership of a farm assurance scheme is a decision for an individual farming business based on the value of assurance to that business.

¹³ <u>https://www.gov.uk/government/publications/delivering-economic-growth-and-nature-recovery-an-independent-review-of-defras-regulatory-landscape</u>

The role of earned recognition has been a key conversation in the context of SFS and the design of the universal actions that will form the initial entry level of the scheme. The NFU Cymru President has been clear with the WG and its agencies that there should not be duplication. It has worked through the various stakeholder forums on SFS to seek opportunities that positively reward farmers through earned recognition. For example, the health plan required as part of the Universal Action on Animal Health in the SFS is an obvious area where parallels between scheme requirements and farm assurance requirements can be found.

NFU Cymru has met with **WLBP** to discuss the role of earned recognition and to look for ways FAWL members can benefit. It has also had regular engagement with **Natural Resources Wales (NRW)** and a potential greater role for earned recognition is under constant discussion.

A key lobbying "ask" by NFU Cymru is for the WG to conduct a review of the cumulative regulation on Welsh farm businesses. A key requirement would be identifying the cross overs with farm assurance and reviewing where earned recognition could be applied for more risk-based outcomes.

Farm assurance scheme membership is not utilised by **NRW**. The NRW Pig and Poultry Scheme uses CB assessors to inspect and report compliance with Environmental Permitting Regulations (EPR) permit conditions while carrying out its audits. Eligibility for the NRW Pig and Poultry Scheme does not include farm assurance scheme membership. NRW does not currently have a policy in relation to earned recognition for agriculture.

The following points were made by the **FSA** in determining how and when it uses farm assurance in its regulatory work:

- the FSA does not recognise the description of a "laissez-faire" approach to farm assurance that is outsourced to private providers and left to the market. As outlined in its response to Recommendation 5.01, the FSA feels it has a clear policy of earned recognition where compliant members of AAS can benefit from a reduced inspection of official controls. It has already determined how, and when earned recognition and farm assurance is used within the regulatory landscape. Earned recognition policy for the areas of primary production, dairy and feed sectors is embedded within the relevant statutory Code of Practice and associated Practice Guidance documents. MoUs are currently being refreshed with farm assurance schemes to streamline definitions and ensure a consistent understanding of the term "earned recognition". This will ensure that the concept is employed consistently across the farm assurance landscape within the FSA remit. It has also added a section on earned recognition for dairy hygiene inspectors in The Manual of Official Controls, a document which sets out the obligations of FSA Field Operations in discharging its regulatory duties
- in terms of a consistent approach to using earned recognition, the FSA feels that as part of continuous improvement workstreams to promote a consistent approach, it has worked with the Programme Officer of NAP to improve clarity and promote its more consistent application
- a key improvement that the FSA has made towards consistency, is in setting up, last year, a member notification system with the Agricultural Industries Confederation (AIC) that indicates both new and withdrawn AAS members to enforcement officers. This has been very successful and received positive feedback from enforcement officers and the AIC Technical Manager who has noticed an increase in enforcement officer engagement since this process has been implemented. At a recent site visit, the AIC was able to communicate to the FSA how it had identified a critical non-conformance during a visit, and the LA officer was on site the next day as a result. This builds increased confidence among local and national regulators about appropriate and proportionate controls in place within third party assurance schemes. This confidence should translate into less duplication of farm visits

In Wales, following requests from LA's, the FSA has worked with Welsh Lamb and Beef Producers Ltd (WLBP) to provide withdrawals from the FAWL scheme. Since August 2024, these have been shared monthly with the FSA and sent to the relevant LA. LAs have commented that receiving these notifications will support their work greatly. Similar work is being undertaken to improve consistency between stakeholders using Red Tractor schemes. For example, the FSA is working with NAP to create materials which will upskill officers and facilitate the consistent application of earned recognition for Red Tractor members. These materials will assist officers in understanding Red Tractor member data, terms

used by Red Tractor when they suspend and withdraw members and agree an approach towards checking and updating contact details for receiving data. Improved data sharing in this way, should provide another mechanism for local regulators to target their regulatory activities using the information available to them.

In addition to this, NAP will provide an up-to-date contact list for LAs to Red Tractor. The FSA has committed to delivering further online training for enforcement officers which will be co-facilitated by the FSA and Red Tractor. This will promote the consistent application of earned recognition and aims to embed the new approach to Red Tractor data checking.

In **Wales**, a "feed delivery day" has been planned for lead feed officers in September. This will cover how those premises awarded earned recognition impact on the LA inspection frequency, the circumstances that the Code and Practice Guidance provides for the removal of earned recognition, the role of the AASs and the exception reporting procedure.

The FSA has also collaborated with Red Tractor to develop a new Red Tractor exception reporting process, via the online Red Tractor portal. The new template for reporting a concern and notifying when earned recognition has been removed from an AAS member will be used to standardise exception reporting across enforcement bodies. Exemplar reports to promote the exception reporting process will be produced ahead of scheduled consistency training in October. It is hoped the new system will facilitate more timely feedback and improved information sharing, allowing regulators to reduce footfall on farms unless exception reports are raised.

In design of Animal Health and Welfare actions for the SFS, the **Welsh Government** has worked closely with farm assurance providers. The concept of earned recognition has been discussed widely. It is the hoped that, in time, Animal Health and Welfare and FAWL standards will become more closely aligned.

However, in the short term, farm assurance standards do not reflect the standards mandated in the SFS animal health and welfare actions. WG expects members of FAWL to be able to access appropriate SFS templates through FAWL systems and complete the FAWL review and animal health SFS actions simultaneously. Feedback from pilot work suggests there is significant synergy between the two processes. Discussions are beginning with the wider regulatory environment particularly the area of environmental regulation.

Recommendation 5.03: Agreeing how regulatory sanctions and farm assurance work together (page 102)

There is scope for farm assurance schemes to continue to be used as a proxy for regulatory inspections, but the terms of such engagements must be publicly available, and an approach must be agreed for the way in which sanctions resulting from non-compliance will be reported. This is intended to avoid the charge (sometimes reported, but for which we have found no evidence) that farm assurance schemes used by regulatory agencies are not serious about maintaining standards and applying appropriate sanctions.

Action: Regulatory agencies working with farm assurance schemes

Timescale: 9 months

	1	2	3	4	5	6	7
Natural Resources Wales	·					Х	
FSA	X						
Welsh Government						X	

All **Natural Resource Wales (NRW)** inspections and enforcement must meet the requirements of the published regulators code, the regulatory principles and enforcement and sanctions policy. NRW inspections and enforcement are conducted in isolation from farm assurance scheme audits. The NRW

Pig and Poultry Scheme uses existing certifying bodies to inspect and report compliance with Environmental Permitting Regulations (EPR) permit conditions.

As part of NRWs commitment to transparency, it publishes an Annual Regulation Report and EPR permit inspection outcomes are also published on the Natural Resources Wales public register: environmental permitting, water resources and marine licensing information, offering a comprehensive overview of NRW regulatory and enforcement activities, which includes agriculture. NRW would welcome the opportunity to understand better how farm assurance scheme assessments are conducted and non-compliances managed.

The **FSA** highlighted the following points:

- with regard to terms of engagement being publicly available, the FSA Memoranda of Understanding and Data Sharing Agreements are publicly available and set out the terms of their engagement
- with regard to agreement for the way in which sanctions resulting from non-compliance are reported, the statutory Codes of Practice and associated Practice Guidance documents, along with the recently refreshed Manual of Official Controls, clearly define the terms of engagement for enforcement authorities and farm assurance schemes
- over recent months, the FSA has collaborated with AAS, enforcement authorities and NAP to ensure a better, shared understanding of the sanctions within the schemes
- the FSA has also been working to improve notification and data sharing processes that ensure enforcement authorities are notified as to why members have been withdrawn/suspended from an AAS. This has already been implemented for AIC, where the scheme provides it with sufficient information to inform its regulatory approach. The FSA expects this process for Red Tractor to be discussed at the National Agricultural Panel meeting in September and finalised and embedded for Red Tractor by the end of 2025. Through a series of FSA engagement events since the publication of the UKFAR it has had further discussions with the AAS to understand the processes for risk-based assessment and for bringing farms back into compliance where non-conformities are identified. Membership withdrawals from the FAWL scheme are provided monthly to the FSA and shared with the relevant LA. All LAs have access to the database which shows the membership status

The **WG** noted that there is no further update on this recommendation at this stage.

Recommendation 5.04: Extending "earned recognition" (page 102)

There is also scope for government bodies to extend the concept of" "earned recognition". Whilst the UKFAR does not support the suggestion that farm assurance accreditation can be used as a gateway to government funding schemes (such as SFI or SFS), it is possible that participation in a government funding scheme could be used to fulfil the relevant aspects of a farm assurance audit. In this way, duplication in the audit process can be avoided, or at least reduced. With the focus on current farming support schemes being largely on environmental measures, this approach may go some way to determining part of the requirements for environmental standards discussed earlier in our recommendations.

Action: Farm assurance schemes, in consultation with government departments

Timescale: 12 months

	1	2	3	4	5	6	7
Global GAP	X						
OF&G					Х		
SQC			Х				
QMS	Х						
Red Tractor						Х	

RSPCA		X			
WLBP	Х				
Soil Association			Х		
LMC NI				Х	
SEDEX				Х	
LEAF				Х	
BEIC				Х	
Natural Resources Wales				Х	
FSA				Х	
Welsh Government		Х			

SQC noted that its response to Recommendation 2.08 also covers this recommendation. Its aim is to be compliant in the future, but it does not expect to meet the envisaged deadline. As indicated in the earlier response, SQC sees the delay being with Government agencies and their lack of resource/prioritisation of such matters.

QMS already works closely with the Scottish Government on where it can complement the work each other does. An example of this the new whole farm plan, where members already fulfil one of the 5 actions by the completion of their animal health and welfare plan.

Red Tractor has plans to write to government departments when more clarity is available over the appropriate contacts. It has also stated that it was unable to categorise progress to date but is working towards being compliant in the future.

RSPCA noted that this is something they would be open to exploring in the future.

WLBP already has earned recognition agreements in place with government agencies and is pursuing further agreements and exploring synergies to avoid duplication (e.g. in the SFS scheme – with particular attention being given to the animal health requirements). Where standards do not align 100%, then systems are utilised to demonstrate compliance for assurance - again with the ethos of completing once and sharing as many times as farmers wishes to.

The **Soil Association** also felt it hard to categorise its response. It noted that it has worked hard on earned recognition in relation to animal welfare and environment, but is not in a strong position to leverage this recommendation.

BEIC is regularly engaged in conversations with DEFRA and other government departments/agencies, plus the devolved administrations and other bodies in relation to regulations and standards. The success of the Lion Quality scheme is such, that it feels, it has already achieved earned recognition (e.g. fewer animal welfare inspections, meeting insurance companies' biosecurity requirements etc). It also feels that there is little opportunity to extend earned recognition in the manner suggested, as the Lion Code of Practice is principally a food safety scheme and the egg sector receives minimal grant funding. BEIC will of course remain receptive to any opportunities that present themselves as it receives feedback into its governance committees.

LMCNI noted that NIBLFQAS currently operates "earned recognition" with organisations, such as the FSA. Compliance with various hygiene regulations represents an additional benefit which NIBLFQAS delivers for farmers, whereby NIBLFQAS members are less likely to receive Food and Feed Law inspections. NIBLFQAS recognises the importance of ensuring there is no duplication for the farmer, however, there is a "balancing act" with earned recognition. NIBLFQAS is a voluntary scheme and when LMCNI has sought to expand the scope of earned recognition in the past, proposals have stalled because NIBLFQAS was being asked to adopt the role of an enforcer/regulator. LMCNI continues to explore opportunities for NIBLFQAS to act as a mechanism for the efficient delivery of government schemes, seeking to reduce the data collection burden on farmers associated with these schemes.

NIBLFQAS is currently considering whether it is an appropriate mechanism for carbon foot printing data collection.

NRW would welcome discussions to explore how farm assurance scheme membership could be used in the future delivery of its duties. NRW currently does not have a policy in relation to earned recognition for agriculture.

The **WG** noted that there is scope to extend the concept of "earned recognition". It is currently considering how the merits of the concept may work in practice in improving efficiency, as well as reducing administrative burden upon farmers and Government. This is particularly relevant within the context of farm assurance accreditation and the possibility of it being equivalent with meeting selected universal actions under the new Sustainable Farming Scheme in Wales. However, any accreditation would have to align with the policy intent and ambition of the actions in the scheme.

Recommendation 5.05: Using farm data to determine the impact of policy changes (page 102)

A better coordinated and resourced UK farm assurance system could provide a considerable source of information about farming across the UK, together with evidence on the implementation of major policy changes on farm operations. One example would be the longer-term assessment of the impact and effectiveness of environmental management schemes, using suitably anonymised data from across the farming industry.

To this end, central and devolved governments should work with farm assurance schemes to develop a commercial method of payment, in exchange for the release of relevant data from farming businesses, to support longitudinal studies on the outcomes of the UK's post-Brexit farming support schemes.

Action: Government departments

Timescale: 9 months

	1	2	3	4	5	6	7
Natural Resources Wales						Х	
FSA						Х	
Welsh Government			Х				

The **FSA** policy of "earned recognition" does not rely on individual farm level data, but rather uses aggregated data from across the AAS to identifies risks in the system. Any future changes to the farm regulatory system from an FSA perspective, would be carried out in line with FSA principles of openness, transparency and stakeholder engagement and would be subject to a formal statutory consultation.

As described previously, the **WG** hopes to be able to capture farm assurance and SFS action data and anonymise it, before reporting back, so as not to breach any GDPR type rules. This is dependent of on the SFS and FAWL systems becoming more closely aligned in the future, as the potential value of integrating the processes becomes realised by industry and Government and there is appetite for some level of data sharing to inform appropriate changes in policy.

The Head of Farm Assurance and Food Certification within the WG will engage closely with farm assurance scheme managers towards achieving better alignment.

Recommendation 5.06: Improving government understanding of the role of farm assurance (page 103)

It follows from our recommendation for the allocation of clear responsibilities for farm assurance that, within DEFRA, there must be close liaison with its Farming and Countryside Programme. The aspiration of FCP is to transform the way central government regulates and supports agriculture and the countryside environment — and without better engagement and a focus on farm assurance, the

opportunity will be lost to deliver recognition of the role of farm assurance schemes and how regulation and farming support mechanisms might be better aligned to the farm assurance system.

Action: DEFRA

Timescale: 12 months

	1	2	3	4	5	6	7
DEFRA							Х

There was no response from DEFRA at this stage.

In response to Strategic Recommendation 5, **LEAF** noted that while there is some element of earned recognition for LEAF Marque through the Environment Agency, it remains open to new possibilities to engage with DEFRA aligned to the Sustainable Farming Incentive and other environmental programmes. The one note of caution it signals is that it is important that private voluntary standards, such as the LEAF Marque, do not end up serving a quasi-regulatory function for which they are not designed or resourced.

Strategic Recommendation 6: There must be greater coordination in the way in which farm assurance operates across the UK nations.

Recommendation 6.01: Consider a new approach for combinable crops (page 103)

There are issues with the combinable crops sector, where evidence from the industry suggests that the Red Tractor model is not effective. Trust, in some cases, has broken down between the scheme and its members. We recognise that RT is working on a new entry level grain standard, but we still believe that the cereals sector must take stock of the UKFAR farmer feedback and decide if a new comprehensive model for the sector should be adopted.

To this end, an exercise to compare and contrast the RT assurance scheme for this sector with the Scottish Quality Crops assurance scheme and the Food Fortress programme in Northern Ireland would provide a means to begin a thorough review, which should be time limited and which should engage widely with the combinable crops industry, and the AIC, to co-develop a new approach. The Review must take account of the mixed nature of many farm businesses, to ensure that a new approach, if adopted, does not increase farm assurance requirements or cost.

Action: Crops supply chain organisations, coordinated by the AHDB

Timescale: 6 months

	1	2	3	4	5	6	7
AHDB			Х				

A draft specification for a substantial Cereal and Oilseeds research project has been circulated to industry and feedback incorporated. The project will utilise internal the **AHDB** expertise and external facilitation, to develop collaborative outputs with industry, which will then be published in stages over the next 10 months. The focus of each stage is described below - stage one and seven are of relevance to this recommendation:

- 1. The differences between the farm assurance systems in the UK
- 2. The differences between farm assurance standards and legislation
- 3. What legislative requirements both domestic and imported grain must meet and how imported grain meets UK legislation
- 4. How farm assurance facilitates and delivers legislative and contract requirements for the supply chain
- 5. The additional benefits that farm assurance provides to the whole UK supply chain
- 6. The procedures and standards that are used in countries from which the UK imports and to identify how they differ from UK farm assurance standards
- 7. How the UK could meet legislative requirements and be compliant with contractual requirements if there was no farm assurance or under a different model of farm assurance

Recommendation 6.02: Improving Red Tractor understanding of farming in Northern Ireland (page 104)

There are also particular issues pertaining to Northern Ireland and the complexities arising from its soft border with the European Union. These need to be taken into greater account by RT, which should establish a Northern Ireland governance board to focus on the farming circumstances found in this part of the UK. It is envisaged that the board would have strong farmer representation so that it can best understand the operating environment and trading arrangements that apply to Northern Ireland farm businesses.

Action: Red Tractor

Timescale: 6 months from publication of the UKFAR report

	1	2	3	4	5	6	7
Red Tractor							Х

Red Tractor made no comment on progress in this area at this stage.

The **LMCNI** commented though on the importance of farm assurance in Northern Ireland, as follows:

- the current quality assurance measures provide the NI red meat supply chain with full equivalence
 when it comes to the recognition and acceptance by retailers and caterers throughout the UK of
 beef and lamb that is produced in Northern Ireland, but with the autonomy to reflect the production
 systems that uniquely characterise Northern Ireland's beef and sheep sectors
- LMCNI and the NIBLFQAS Industry Board want to build on this for the future. Livestock production
 systems in Northern Ireland are different to those practised in many other parts of the UK. Farms
 are often smaller, with grass-based systems predominating. These are NI's fundamental strengths,
 and must continue to be recognised within the farm assurance schemes that operate throughout
 the UK
- in Northern Ireland, NIBLFQAS is unique in its ability to progress initiatives quickly in response to
 industry requests. As NIBLFQAS is funded by producers and processors in a joint funding model
 LMCNI can respond collaboratively on initiatives, which it believes it has done successfully over the
 years at industry request (e.g. Food Fortress, BVD eradication and tackling AMR)
- the publication of the UKFAR report comes at a time when public awareness of the NIBLFQAS logo
 has never been higher. The home market accounts for approximately 15% of Northern total red
 meat output. Independent market research, carried out this year, confirms that the NIBLFQAS logo
 has an 84% recognition rating with the public. This, they note, is an extremely high figure, well
 above what would be expected for most, if not all, of the best known-food brands purchased in local
 shops every day of the year
- the use of the NIBLFQAS logo illustrates that beef and lamb has been sourced from farms that have met the quality assured product standard, as independently verified by Northern Ireland Food Chain Certification (NIFCC). Delivering this level of public awareness for the quality assurance scheme also ensures beef and sheep farmers can see how their money is being spent. The sustained growth in awareness of the farm quality assured logo benefits the beef and lamb sectors in equal measure. The growing awareness of the logo goes well beyond brand recognition: it gives consumers the reassurance they want when it comes to buying the beef and lamb in retail outlets. Full NIBLFQAS compliance also guarantees access to the UK retail sector. In turn, this opportunity helps deliver higher beef and lamb prices for quality assured farm businesses across Northern Ireland.

Recommendation 6.03: Creating "one voice" for UK farm assurance (page 104)

We recognise that efforts have already been made to find ways in which assurance schemes can collaborate to achieve greater coordination of effort across the UK. However, we understand that whilst some schemes have continued with a positive approach to this endeavour, not all schemes have participated to the same level. New overarching structures to deliver greater coordination are unlikely to be required, not least because of the cost this would entail.

Instead, farm assurance schemes must take part in our earlier recommended "federation," if it is to yield benefits for the schemes and their farming members. This network of farm assurance schemes must seek to deliver economic benefits from collaboration in scheme developments, sharing of best practice and in representing farm assurance schemes to other elements of the food industry, as well as to their respective governments in seeking 'earned recognition' in their farming regulatory systems. A "one voice" approach must be adopted when representing UK farm assurance to external bodies. To this end, as we note earlier, every scheme taking part in the federation must have an equal standing, there should be formal agreement as to how the network will operate, chairing of network meetings should be rotated between members and the arrangements for the network should be subject to periodic review.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G				Х			
SQC	Х						
QMS	Х						
Red Tractor						Х	
RSPCA				Х			
WLBP						Х	
Soil Association	Х						
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC						Х	

Global GAP allows schemes to be benchmarked, so that double audits do not need to take place. Details of this are available publicly on its website.

The proposal to take forward a "Federation" of Assurance Schemes has already been discussed - with one meeting held and the next meeting scheduled for October 2025.

SQC expects TOR for this group to be established at this meeting and have already been supportive of the idea and will continue to be so. However, SQC feels that it may be difficult to have "one voice" for all schemes though it is open to discussing this further. The differences between schemes also needs to be understood (i.e. they all deliver farm assurance but, are all different and it is sometimes unfair to group all schemes together - especially if specific negative press has been published on any one scheme). Differences need to be recognised, and good practice shared between schemes. SQC already works well with other assurance schemes and is in regular contact with QMS and Red Tractor. Indeed, SQC, Red Tractor and AIC collaborate frequently, especially around the EU RED and associated work. SQC also works closely with relevant key stakeholders, including NFUS and the AHDB and believes collaboration to be key in taking forward shared issues and opportunities.

QMS noted that it has always worked closely with other assurance schemes, both in Scotland and in the wider UK. It is taking part in discussions around the federation of farm assurance schemes.

Red Tractor has started progress against this recommendation by writing to farm assurance schemes in March 2025, to suggest they collaborate on this recommendation. However, as this is a collective recommendation, it has not classified how RT will individually comply.

RSPCA is open to discussing how a "federation" of assurance schemes could benefit its members. It has strong links with other schemes already and would be open to strengthening and widening these links to foster relationships with other schemes.

BEIC is working with the industry and participating in discussions. It feels it is unlikely that farm assurance schemes will be able to speak with one voice – what has been established to date is that schemes are all very different with differing aims and goals. Nevertheless, there is benefit in sharing best practice across a range of issues, where schemes are not seen as being in competition with each other.

LMCNI, Quality Meat Scotland (QMS), Welsh Lamb and Beef Producers (WLBP) and **Red Tractor** all work under a Common Framework Agreement (CFA). The aim of this is to document the relationship as to how the schemes work together. As an example, the four UK beef and lamb schemes all have a common aim, to provide safe and responsibly produced beef and lamb to their consumers.

It is recognised; however, the four schemes also make different choices on how to implement assurance standards. Those differences are driven by a variety of factors including but not limited to local

legislation, consumer demand, farming systems, industry/customer demand, the aims for agriculture and the environment in each nation of the UK and the scheme's own aspirations. There is considerable advantage for all schemes to maintain a consistent approach to quality assurance of beef and lamb in the UK. **LMCNI** communicates regularly with the other devolved nations regarding beef and lamb assurance and remains open to further collaboration where beneficial.

A key shortfall identified in the FAR report is the lack of coordination and communication between schemes in the UK. **WLBP** has been part of the Framework Agreement operating in the UK between bodies, delivering assurance in the livestock sector. The framework agreement was intended to share best practice and find appropriate solutions on a UK level, whilst aligning with the devolved nature of agriculture. WLBP believes that any such collaboration should retain full flexibility to align with Welsh specific goals, while maintaining cross-UK interoperability. This was not fully delivered under the previous framework agreement. WLBP notes the UKFAR comments that devolved nations often operate assurance schemes more effectively and collaboratively.

Recommendation 6.04: The role of whole life in farm assurance (page 105)

Livestock farm assurance schemes that do not deliver whole life assurance should establish a plan to do so. We recognise that this will disrupt elements of the farming industry, but it is essential to the longer-term delivery of consumer confidence in product standards and to maintaining the assurance link between product origin and the consumer.

Action: Relevant Farm Assurance Schemes

Timescale: 12 months

	1	2	3	4	5	6	7
Global GAP						Х	
OF&G					Х		
SQC						Х	
QMS	Х						
Red Tractor			Х				
RSPCA			Х				
WLBP			Х				
Soil Association	Х						
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC							Х

Global GAP noted that this recommendation is not relevant to it – as it has stopped animal welfare certification.

QMS has already had a whole of life/whole of supply chain system in place for around 15 years.

Red Tractor note that delivering whole-life assurance is a clear objective for the beef and lamb sector board at the right time, and in consultation and agreement, with all other stakeholders. Other recommendations are considered a priority at this stage, however, so this is on hold whilst other priorities for beef and lamb are progressed.

The **RSPCA** has standards that cover "birth to death" and audit processor/packers. However, it also recognises the need to improve traceability and how it shares certificate information for the members supply chain (a member checker is planned for development).

WLBP would welcome this, but a practical solution for it to be phased in needs to be put in place, UK wide. Past proposals at UK level have proved complex, bureaucratic and impractical.

Whole of life assurance is already a requirement for organic standards through the Soil Association.

In response to Strategic Recommendation 6, **LEAF** noted that the LEAF Marque enjoys a good working relationship with the management team at Red Tractor with whom they meet regularly. LEAF also regularly undertakes reviews to identify any requirements common to both standards that can be simplified within audits, to reduce the burden on producers and avoid duplication.

However, it should be noted that LEAF Marque is an internationally applied standard and therefore some duplication with Red Tractor and Global GAP is inevitable, to ensure the consistent monitoring of core environmental controls across all countries where the standard is used.

Strategic Recommendation 7: Farm assurance schemes must better position the UK farming industry in world food markets and in competition with imported food.

Recommendation 7.01: Standards for imported food (page 106)

There is a need for greater clarity on the food production standards of importing food nations and for these to be directly compared with the standards used by UK farm assurance schemes. To this end, the work begun by the AHDB to provide these assessments must continue and address other farming sectors and other nations. The UK farm assurance schemes must cooperate fully with these exercises to ensure that there is comprehensive information available to inform these assessments.

Action: AHDB

Timescale: Commencement within 6 months

	1	2	3	4	5	6	7
AHDB						Х	

A specification for a dairy international standards comparison study to be commissioned by the AHDB has recently gone out to tender. The cereals and oilseeds research project described in Recommendation 6.01 includes an international standards comparison. The AHDB's Pork Sector Council is due to consider an international standards comparison study in September. The AHDB also studied beef and lamb standards in the EU last year.

While this recommendation is directed at the AHDB, it is only mandated to conduct research within the four sectors from which it collects a levy, and the **NFU** is considering standards comparison studies in other sectors.

Recommendation 7.02: Informing UK farming about food standards in other nations (page 106)

The AHDB and NFU's must use the information obtained via the ongoing programme of comparative assessments of international food standards to provide the farming industry with an evidence base of how UK food production really compares with that of competitor nations. The information in these assessments should provide clear comparisons for ease of interpretation and should highlight major differences where international standards, either exceed or fall below, those employed in the UK.

Action: AHDB and NFUs

Timescale: Commencement within 9 months of publication

	1	2	3	4	5	6	7
AHDB		Х					

A series of beef and lamb standards comparative reports was published by the **AHDB** in 2024. It is anticipated that the dairy comparison study reported in Recommendation 7.01 will be published by

February 2026, and that the cereals and oilseeds standards comparison component of the research project reported in Recommendations 6.01 and 7.01 will be published by April 2026.

The publication of each report will be accompanied by a press release and web article(s) to help levy payers digest key findings and highlight major differences where international standards either exceed, or fall below, those used in the UK.

The AHDB will be discussing further steps on this work, as part of its future business planning.

Recommendation 7.03: Farm assurance for combinable crops (page 106)

The combinable crops sector has issues with the use of assurance standards when imported products can be mixed with those produced in the UK. There is a view that this can distort the presentation and consumer understanding of a product, so that it is thought to solely meet UK farm assurance standards.

Whilst it is recognised that only a limited number of consumer products based on such crops carry the Red Tractor logo, there is no equivalent trade labelling for products when mixed with imported combinable crops. This practice must be changed, so that clear labelling is employed to identify the origin of component materials in a combinable crops product, in order to provide a complete picture for others in the food chain, and for consumers, about the nature of a product and, with the comparative studies we have previously recommended, the standards to which it has been produced.

Action: Farm Assurance Schemes, working with Combinable Crops Sector representatives and their customer base

Timescale: 9 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G					Х		
SQC				Х			
QMS	Х						
Red Tractor						Х	
RSPCA						Х	
WLBP						Х	
Soil Association					Х		
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
UK Flour Millers					Х		
AIC							

SQC does not undertake marketing activities, as part of its business model. SQC's primary objective is to provide Scottish growers with assurance, thereby ensuring ongoing access to relevant markets. However, it is appreciated that there is work required to better understand and educate around the need for imports and the requirements placed on imported grains. It is SQC's understanding that there is no "like for like" assurance on imports, which makes it difficult to benchmark domestic standards against import requirements. There is a need for a comparison of legislative and regulatory requirements and what standards are expected, via the buyer, for imported grain. SQC looks forward to working with the AHDB on their Cereals & Oilseeds Farm Assurance Research, which will investigate this further and has already provided detailed feedback to them.

The **Red Tractor Board** will consult with the UKFAR Commissioners, and the stakeholders represented on the crops sector board, to consider how best to meet this recommendation. However, this is "on hold" now, as other priorities for the crops sector are being progressed. RT cannot, at this stage,

comment on whether it will be compliant with this UKFAR recommendation in the future until it has consulted with relevant stakeholders at the appropriate time.

This recommendation is outside the scope or control of the **Soil Association** standard. There is already origin labelling as part of organic regulation.

UK Flour Millers noted that food businesses make decisions on finished product labelling according to legal obligations and marketing requirements. The milling sector cannot compel its customers to declare or label the origin of ingredients in their products. A very small proportion of flour (approximately 4%) is sold as pre-packed flour (i.e. in bags for direct sale to the consumer). Origin declarations are made for some flour products, where the wheat is consistently 100% UK origin. Practically, this is difficult to guarantee for most flours, as mills blend wheat in a continuous flow process to deliver the required, consistent functional quality in the flour.

The UK milling sector has transitioned from using only 35% UK origin wheat in the 1980s to 80 - 85% UK origin wheat in a typical season now. Wheat is imported for reasons of functional quality. It is crucial that the UK milling industry can use imported milling wheat, particularly given the significant season-to-season variability in UK wheat quality and quantity. Where the Red Tractor marque is used for combinable crops products, 100% of the product must be UK-origin.

AIC recognises the concern regarding the mixing of imported crops with those produced in the UK, and the potential for confusion over how products are represented to consumers. The mixing of UK grown with imported crops, typically is at the point of manufacture of a product. Strict traceability and segregation are in place from the point of import and storage within UK certified stores to the merchanting and haulage of such goods. However, it is important to note that responsibility for labelling requirements rests with government and, ultimately, with end users in the food chain. It is government regulation that dictates what must appear on product packaging, and it is consumer demand that drives retailers and processors to provide greater transparency.

The role of the farmer is to promote and market their product in a way that highlights its provenance, quality, and standards. Merchants, by contrast, are facilitators within the supply chain, ensuring efficient movement and trade of crops. It is not the responsibility of the merchanting sector to reframe or redefine how products are labelled or presented, beyond the existing regulatory framework.

In short, if clearer differentiation between UK assured and imported materials is desired, this is a matter to be addressed at policy level and by those closer to the consumer, rather than through merchanting. Farmers remain best placed to tell the story of their own production standards and to market their crops accordingly.

It is important to note that the UK does not produce all the grain and oilseeds it requires. Imports are a necessary part of the supply chain, and while they must meet UK feed and food safety standards, they typically do so through contractual requirements, product testing, in-depth analysis and mutually recognised schemes such as Good Manufacturing Practice Plus (GMP+) and European Feed and Food Ingredients Safety Certification – Good Trading Practice (EFISC-GTP). These are benchmarked as equivalent to the AIC's Trade Assurance Scheme for Combinable Crops (TASCC), in contrast with the UK's current reliance on farm assurance as a core control mechanism.

Products which carry the Red Tractor logo must contain 100% UK assured goods, but very few products within the combinable crop sector only contain UK grown crops. Therefore, is there an option that a farm assurance label can be used, if, for example 30% of the final product is imported?

Imported crops, while not necessarily produced under an equivalent farm assurance scheme to the UK are produced meeting the same legal food and feed safety standards by comparable schemes and trade assurance. The statement refers to products carrying the Red Tractor logo – and the Flour Millers wonder is there a similar need for the Scottish Quality Crops logo and if retailers been consulted on the viability of additional labelling on pack?

Recommendation 7.04: Reviewing international standards by government (page 107)

All government departments with responsibility for the farming and food industries should ensure that they reconsider their approach to ensuring that standards for imported food are equivalent to those of UK farm assurance schemes, and that changes in international standards are kept under close review to assist in the export of UK food products. The work proposed must be conducted by the AHDB and NFUs, to maintain oversight of international food assurance standards and should be used as evidence to support this recommendation. It should be seen as a refocus by government departments on developing and supporting a new, comprehensive, UK food export strategy.

Action: Relevant government departments, together with the AHDB and NFUs

Timescale: 9 months

	1	2	3	4	5	6	7
NFU	Х						
NFU Scotland			Х				
NFU Wales	X						
UFU				Х			
AHDB			Х				
Natural Resources Wales						Х	
FSA	Х						
Welsh Government			Х				

The **NFU** has a proposed solution for government, with a suggested set of "core standards" for production, setting out the most important animal welfare and environmental protections that UK food producers observe. This would enable the NFU to ensure that the food we eat, whether produced here or abroad, meets the high expectations of British consumers.

NFU membership of the **Trade and Agriculture Commission** also allows it to make these policy "asks" during the process of scrutinising trade deals. The NFU's International Trade Hub provides analysis and scrutiny of new and emerging trade deals, including a critique of the recent 'blueprint for trade' launched by government.

The **AHDB** has led work across its levy paying sectors looking at international assurance standards comparisons. The NFU is endeavouring to do the same, where possible, for sectors such as fresh produce, but this will be a lighter touch process. Initial findings have shown much closer alignment in fresh produce between the UK and other sources of supply, due to the more international nature of many horticultural businesses and the seasonal nature of produce.

NFU Scotland has had initial discussions with **Scotland Food and Drink** to make them aware of the UKFAR report and its recommendations. It intends to have further conversations with the Scottish Government in this regard. NFUS also provided feedback to the AHDB on its project specification on imported grain and has recently met with them on the final version. It is happy to remain engaged in this project as needed and has been pro-actively engaging with members on this issue as this is something that it is very concerned about. On imported meat, NFUS remains invested in the Shelf Watch project, which monitors what products retailers are making available to consumers. The most recent iteration has evidence of imported beef by some retailers, and this is something that will be taken up directly.

The **UFU** agrees this is a vital area, as there is a need to ensure high standards are not undermined by cheaper imports. The UFU is working with the other NFUs and the AHDB to support a more comprehensive UK food export strategy and is proactively engaging with government departments to highlight the need for equivalent standards for imported goods. It is committed to ensuring our standards are not eroded by imports that do not meet equivalent levels of welfare, traceability, and environmental protection, and is also highlighting how a strong UK assurance scheme can be used as evidence to

support a new, comprehensive UK food export strategy. Given the global nature of fresh produce, it is undertaking work, along with other UK Farming Unions, to analyse international assurance standards to ensure that any imported produce aligns with high domestic standards.

NFU Cymru has long been calling for a set of "core standards" for production that the UK government should consider when negotiating trade deals. These core standards would set out the most important animal welfare and environmental factors that UK food producers observe and thus, the UK Government would ensure that the food we eat, whether produced here or abroad, meets the high expectations of British consumers. Further to this, membership of the TAC allows the NFU to make these policy requests during the process of scrutinising trade deals. For example, it has recently fed into the inquiry on the UK/India trade deal. NFU Cymru works closely with other colleagues in the NFU International Trade team to analyse and scrutinise trade deals during negotiation and post agreement. It is also a member of the WG Trade Policy Advisory Group and uses its seat on the group to highlight the opportunities and threats for Welsh farmers in international trade.

Regular meetings are taking place between the NFU, the AHDB and DEFRA. The **AHDB** is still, however, awaiting a DEFRA formal response to the UKFAR recommendations. It will continue to highlight the findings of ongoing standard comparison studies to DEFRA and other relevant stakeholders.

The **FSA** does not have any evidence that UK farm assurance schemes hold UK farmers accountable to a higher standard than international farmers. While scheme standards are developed independently, for schemes to be approved as an AAS, the FSA only asks schemes to meet requirements that are mapped to relevant legislation, in a process referred to as "legislative mapping". This provides the basis on which FSA allows a reduction in frequency of official controls.

The FSA's earned recognition policy is aligned to the latest principles and guidelines of the Codex Alimentarius Commission for the Assessment and Use of Voluntary Third-Party Assurance Programmes. These international guidelines aim to harmonise and strengthen the use of voluntary third-party assurance schemes and allow it to recognise the role of independent accreditation and certification services in verifying the credibility of AAS.

The **Welsh Government** noted that there is recognition that this exercise needs to be undertaken. The Head of Farm Assurance and Food Certification will be liaising with the AHDB and NFU to make progress.

Recommendation 7.05: The Trade and Agriculture Commission (page 107)

The UK Government should reconsider the way in which the TAC operates, so that it can provide advice during the negotiation process on free trade agreements where those agreements cover aspects of agriculture and food production, not just on the post-agreement impact of any Free Trade Agreement(s) (FTA) on the UK farming and food industry. The advice provided by the Trade and Agriculture Commission may be regarded as non-binding, but it should at least be considered to help inform the UK Government's negotiating position.

Action: UK Government

Timescale: 12 months

	1	2	3	4	5	6	7
UK Govt via DEFRA							Х

There was no response from DEFRA at this stage.

In response to Strategic Recommendation 7, **LEAF** noted that it supports UK brands and retailers with data to underpin positive messaging about the environmental impact of the LEAF Marque certified supply base. This is particularly relevant for some retailers, whose commitment to LEAF Marque extends solely to products grown or sourced from the UK. In addition, LEAF is engaged with retailers outside the UK about how LEAF Marque may support their environmental sustainability programmes,

which could potentially create a bigger market for UK based LEAF Marque certified producers in the future.

Strategic Recommendation 8: All farm assurance schemes must review, and, where necessary, improve their methods of communication with the farming industry.

Recommendation 8.01 A 'farmer first' approach to communications (page 108)

Farm assurance schemes must continue to review the way in which they communicate with farming members to ensure that their institutional culture(s) deliver a "farmer first" approach to the delivery and development of their farm assurance scheme. This process should be revisited on a regular basis to ensure that scheme staff understand the importance of farm member communications and that their means of communication remain effective.

Action: Farm Assurance Schemes

Timescale: 3 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G			Х				
SQC			Х				
QMS	Х						
Red Tractor	Х						
RSPCA			Х				
WLBP	Х						
Soil Association	Х						
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC	Х						

SQC undertook a full review of its communications in 2022. They produced a communications strategy, that prioritised engagement with their growers. This is renewed quarterly. It includes a member's newsletter, technical updates on scheme developments, text messages for priority information, social media to engage with other stakeholders on delivering and explaining key messages, a SQC website (currently under full redesign), reporting and scheme documentation designed to support preparation for assessments.

Since 2022, **Quality Meat Scotland** has undergone a restructure. This included reviewing its communications team, bringing this activity "in house", and which is reviewed bimonthly, along with assessing stakeholder sentiment. There was also a governance review of the quality assurance schemes, focusing, not least, on communications around standards setting, so that members are consulted about changes to standards before any "sign off", and there is minimum period between standards being launched and "going live" to give members time to familiarise themselves. There is also a minimum of 50% of farmer representation on standards setting committees.

Red Tractor noted that it is totally committed to ensuring their farmers "see, hear and feel" real change. Since March this year, its newly appointed Director of Communications and Engagement has reviewed its communications activities, consulting with technical, communications and leadership staff, Board and farming stakeholders, including the NFU and the AHDB, and specialist agencies to identify areas for improvement.

This has underpinned the development of an upgraded comprehensive communications strategy, which seeks to strengthen communications with all stakeholders, with a particular focus on building farmer trust. This was presented to the Board of Directors in May. Key elements of the communications strategy include face to face farmer meetings, appointing a communications agency to add value to farmer-facing communications, improvement to digital communications to farmers - including the RT website and newsletters, better cascading of information to farmers, training for farmer-facing spokespeople

and a review of farmer-focused research. The recruitment of a digital communications manager is also underway.

The **RSPCA** also has a strategic plan in place, set out before the full outcome of the UKFAR was published. The strategy incorporated the findings and recommendations of the Crowe Review and an independent review of the scheme's effectiveness. It is reported to be progressing well against the strategic objectives, however, it may not be fully aligned with the timescales of this review.

The **Soil Association** also reported that it already has a long-standing process in place for standards development that ensures all stakeholders are represented and consulted. The Soil Association currently produces a wide range of communications with farmers.

LMCNI, in conjunction with the NIBLFQAS industry board, has recently developed a strategic plan for 2025 - 28, which outlines the strategic priorities that its stakeholders wish to see progressed in the next 3 years. These align with the strategic recommendations outlined in the UKFAR. In response to Recommendation 8, it is driving an electronic communications plan, with the aim to improve communications with farmers. This is proving somewhat challenging now, due to the cost of investment required and demographics.

LMCNI also recognises the need to tailor its services to support its traditional producer/stakeholder base, whilst building more dynamic relationships with up-and-coming technology and "data savvy next generation" farmers. This is aimed at being carried out in the latter years of the strategic plan. LMCNI also noted that communicating with farmers and fully recognising their input when it comes to delivering effective farm assurance has been, and always will be, a priority in Northern Ireland. The Ulster Farmers' Union, National Beef Association, National Sheep Association and Northern Ireland Agricultural Producers' Association are all represented on the NIBLFQAS Industry Board and Standard Setting Committee.

As a result, farm stakeholder bodies are at the very heart of the decisions taken in delivering a farm assurance scheme that fully recognises the structure of the local beef and sheep sectors. The report outlined that there are lessons to be learned from the devolved nations where schemes work better together and where they have a more constructive relationship with farmers. LMCNI operates the beef and lamb farm quality assurance scheme on behalf of the entire livestock sector. The reality is that primary producers are co-owners of farm quality assurance in Northern Ireland, where there are c.11,500 farm quality assured beef and sheep businesses at the present time.

SEDEX noted that it is already compliant in this area. Its approach, solutions, governance and operations reflect its responsibilities to its full range of members. These include both UK farmers and other international industries. In total, it serves 95,000 business members across 180 countries and 35+ sectors. The audit process, therefore, is deliberately a global and sectoral agnostic methodology to facilitate standardised, comparable data from across regions and industries, streamline data-sharing and enable supply-side businesses to share one audit with multiple diverse customers.

The **BEIC** represents the entire egg sector supply chain. Its governance structures include attendance and discussion of the following meetings of these organisations:

- British Egg Association (BEA) which includes representatives from the NFU, BFREPA (British Free Range Egg Producers Association, producers, packers and pharmaceutical companies. It meets quarterly
- British Egg Products Association (BEPA): this association represents processors and marketeers
 of egg products and meets quarterly. Pullet Hatcheries & Breeders Association (PHBA): Association
 representing the interest of UK hatching businesses. It meets three time a year
- Pullet Rearers Association (PRA): representing the interest of UK pullet rearers. It meets three time
 a year
- National Egg Marketing Association (NEMAL): a group representing UK sellers of eggs (packers)
 that meets 3 times a year. This primarily includes Lion Subscribers (i.e. the businesses that make
 financial contributions to fund the activities of the BEIC and the assurance scheme)

 The BEIC Council which includes representatives from all farming unions in the UK, BFREPA, BEA, PHBA, PRA, BEPA and the National Egg Marketing Association Limited. The Council meets quarterly and discusses industry wide issues and the Lion Scheme

In addition, BEIC has several sub - committees – a Technical Committee, Environmental Committee, Executive Committee - that discuss and consider live issues and the detail of the Lion Standards. Finally, BEIC communicates in trade publications, sends out regular newsletters, presents at conferences, has stands at industry trade shows and attends BFREPA Board meetings and on occasions the NFU Poultry Board. It carries out a great deal of communication with the egg sector, including producers. BEIC discusses and reviews the methods of communication regularly with a view to continuously improve and ensure it is making use of the most up to date communication methods available.

Recommendation 8.02 Implementing the Commission's recommendations (page 109)

All farm assurance schemes must publish an initial report on the implementation of recommendations contained in the UKFAR report and ensure that this is made available to farming members and to the wider farming community. Where certain recommendations have not yet been implemented, a clear timetable for their completion must be provided in the report, and updates made available to the farming industry on a guarterly basis until the implementation work is complete.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G	Х						
SQC		Х					
QMS		Х					
Red Tractor	Х						
RSPCA		Х					
WLBP		(Х		
Soil Association				Х			
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
BEIC				Х			

SQC has completed work to produce two new documents since the release of the UKFAR, which will be shared with all (assured) growers and key stakeholders, and made more widely available on the new SQC website. These documents outline the strategic recommendations along with a view from SQC, and actions for which farm assurance schemes have a responsibility, as well as a traffic light labelling system, for progress made. It noted that this plan will be reviewed on a 6 monthly basis.

QMS noted it has limited resource to make progress on these actions from the UKFAR recommendations, but has liaised regularly with NFU bodies and focused on ensuring feedback was provided for this stage of the report.

Red Tractor reported that it is committed to providing regular updates on the delivery of the UKFAR recommendations every 2 months, following board meeting updates. These updates will be publicly available on its website. The latest update at the time of this report is the July 2025 publication, where it is noted that to ensure continued progress, Red Tractor has begun working on enhancing audit efficiency to reduce the burden on farmers, leveraging new technology to improve efficiency and ease demonstrating compliance and strengthening communication with farmers and growers.

The **Soil Association** does not intend to publish a report on the update of the actions associated with the UKFAR recommendations, due to legal limitations within the Soil Association status as both a charity and certification body. However, it is prepared to cooperate with the UKFAR and any resulting initiatives.

BEIC noted that the requirement to issue an initial report within 6 months and then provide quarterly updates is onerous and unnecessary for the Lion Code of Practice. Its communication structures already ensure that all stakeholders are involved in discussions about the impact of the UKFAR on the BEIC. Timelines and processes for any changes to be considered are fully discussed in these forums.

Recommendation 8.03: Using Features/Advantages/Benefits statements (page 109)

The finance and insurance sectors produce a Features/Advantages/Benefits (FAB) statement for each of their products, setting out in plain English, and in a consistent way, the nature of the product and the way in which it will operate.

Using the statement on good practice in farm assurance provided in the UKFAR report as a starting point, farm assurance schemes must produce a similar FAB statement to make clear what is required from farmers by the scheme, the standards in the scheme's operation that farmers can expect, as well as aspects that the scheme will not cover.

This will establish a clearer understanding of what it is that farm assurance is expected to deliver, and, importantly, what the farm assurance scheme will not provide.

Action: Farm Assurance Schemes

Timescale: 6 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G					Х		
SQC		Х					
QMS	Х						
Red Tractor		Х					
RSPCA						Х	
WLBP			Х				
Soil Association				Х			
Agri Audit	Х						
LMC NI						Х	
SEDEX	Х						
LEAF						Х	
BEIC				Х			

SQC already provides this documentation via its website which, as stated previously, is currently under redesign.

QMS already produces and publishes a benefit to members document, and when next reviewed, this recommendation is set to outline any changes made.

Red Tractor noted that it will work with the UKFAR Commissioners to understand expectations and structure for FAB statements before developing them. Also, within Red Tractor's new communication strategy, it is ensuring that developing strong messaging and value propositions are a clear deliverable.

SEDEX provides various assets and materials on the features and benefits of all of its solutions, including **SMETA** - on its website that explains the benefits from supplier and SMETA membership to specific guidance and dedicated training on SMETA. These materials are created with reference to and

applicability for its range of members across regions, industries and supply chains globally, including UK farmers, with English being the standard language (though materials and training are also provided in several other languages).

The benefits of the Lion Code of Practice are seen to be well known and understood. The **BEIC** reinforces these messages through its communication methods outlined earlier.

Recommendation 8.04: Avoiding "mission creep" to address third party requirements (page 109)

We have already recommended changes to the way in which farm assurance standards are introduced to ensure that their origin is clearly stated. In cases where changes to farm audits that purport to relate to farm assurance requirements fall outside the accepted purpose and scope of farm assurance contained in this report, they must be subject to full industry consultation, an independent impact assessment and an agreed method to share the cost of implementation and operation. These actions must be undertaken collaboratively, to achieve a collective decision on whether, and how, such changes are to be implemented, and how the costs will be shared across the wider food chain.

Action: BRC with NFUs and the AHDB

Timescale: 6 months

	1	2	3	4	5	6	7
AHDB			X				

The **AHDB** commented that the recent **Red Tractor** Pork consultation process indicates that industry feedback is being taken on board in its standard setting process.

Although **Red Tractor** is the main scheme the AHDB interacts with, it agreed with the need for an independent impact assessment when proposed standards fall outside any scheme's agreed scope. Further agreement on the principles that should underpin such an impact assessment is on the agenda for the next roundtable discussions in September. It is also seeking further dialogue with retailers and BRC.

BRC declined the opportunity to participate in the current UKFAR progress update.

Recommendation 8.05: Implementing culture change (page 109)

Where farm assurance scheme boards do not already do so, they must implement culture change programmes with their respective senior management teams to ensure that the "farmer first" approach advocated in the UKFAR is followed through to all levels within their organisation. This could take one of several forms, including the use of leadership coaches and/or 360-degree appraisal. The outcome of this work must be measured with farmer member feedback at routine intervals so that scheme boards are kept appraised of progress in developing greater levels of trust between farm assurance schemes and their farmer members.

Action: Farm Assurance Scheme Boards

Timescale: 9 months

	1	2	3	4	5	6	7
Global GAP	Х						
OF&G					Х		
SQC	Х						
QMS	Х						
Red Tractor	Х						
RSPCA	Х						
WLBP	Х						

	1	2	3	4	5	6	7
Soil Association				Х			
LMC NI						Х	
SEDEX						Х	
LEAF						Х	
AHDB			Х				

Most assurance schemes reported that they are "already compliant". However, it is often felt that currently there is still not a strong enough farmer led approach, and lack of tangible benefits for members, which first and foremost needs addressing.

SQC noted that it always has supported a farmer first approach, and given their cooperative structure, farmers are at the heart of the scheme, with ongoing feedback encouraged.

QMS also identified its levy payers and members as the number one stakeholder for the organisation, with the QMS board comprising 50% farmers or processors.

Under **Red Tractor's** Action Plan, it is improving efforts to increase engagement with farmers, as part of its leadership culture, implementing an annual survey with sector boards to measure effectiveness of leaderships communication, and continuing to seek feedback from farmers on a regular basis to understand how they feel about RT.

As part of **RSPCA's** work on key strategic aims, it has been working to create a new 'behaviours and mindset framework' and has also invested in leadership development programmes.

SEDEX serves over 95,000 business members across 180 countries and 35+ sectors. The **SMETA** audit is deliberately a global and sector agnostic methodology to facilitate standardised, comparable data from across regions and industries, streamline data-sharing, and enable supply-side businesses to share one audit with multiple diverse customers. The SEDEX approach, solutions, governance and operations reflect its responsibility to the full range of members, including both UK farmers and other industries all over the world.

Recommendation 8.06: The ownership of Red Tractor (page 110)

We considered the current ownership arrangements of Red Tractor, and the merits, or otherwise, of changing to a more independent structure, as suggested in the scheme's evidence submitted to the UKFAR. We recognise that this scheme can be caught between the requirements of its owners and need to implement change or address issues that might prove difficult with one of the industry sectors it serves.

This means that the scheme is sometimes held to account for matters beyond its immediate control, or that change can take much longer than necessary. Coupled with some shortcomings in its approach to communications with farming members, this has contributed to the largely negative feedback we have received from farmers about the scheme and its operation.

However, because the UKFAR concluded that the scheme exists to serve its farming members, and that there would be the possibility of a farm assurance landscape driven by other industry sectors, rather than with the full contribution of farmer members, a change to a more independent structure is not appropriate at this point.

It follows that the current ownership arrangements should remain in place, but these must be balanced by the RT Board being reaffirmed as the primary governing body for the organisation. The owners of the scheme must show greater and more active leadership, to help shape its future direction and organisational culture, but without straying into issues of setting strategic direction and overseeing operational delivery, which should remain with the RT board.

The terms of this arrangement should be established by the Board and the scheme owners and published so that they are clear to members of the scheme, to determine how farmer sentiment towards the scheme has changed because of this programme of work.

Action: Red Tractor Board and Ownership Organisations

Timescale: 12 months

	1	2	3	4	5	6	7
AHDB		Х					
NFU			Х				
NFU Scotland	Х						
NFU Wales		Х					
UFU		Х					
Barbers Cheese			Х				
M&S			Х				
Cranswick	Х						
Dairy UK	Х						
Anglia Free Range Eggs			Х				
Morrisons						Х	
ABP				Х			
British Sugar						Х	
Lidl	Х						
Со-ор						Х	
Arla	Х						

As part of the ownership body, the **NFU** will proactively take on board the comments in this recommendation, working alongside the other owners. It is committed to working with the board and other owners to deliver the best possible balance of active leadership alongside the RT Board's operational delivery to ensure the process happens transparently.

The **AHDB** noted that it will be imminently compliant with this recommendation. It noted that the need for the ownership body to show greater and more active leadership has been discussed internally and with other ownership body members. It aims to make further progress with this over the autumn/winter period.

NFU Scotland noted that as they are not full members at Red Tractor Board, it hampers its ability to input as fully as it would wish, nor does it provide full visibility of board level discussion. due to confidentiality. However, in general, it has seen **Red Tractor** increase visibility and take a more proactive approach to communications.

Dairy UK as a member of the ownership body have accepted the recommendations of the UKFAR in this respect.

A number of retailers and processors commented on this recommendation.

Barbers Cheese noted that it believes ownership is less of a problem, whilst governance is a larger factor.

M&S supports the recommendation for the Red Tractor Boards to act independently of the owners, but would like them to recognise the needs of the customer and consumer as well as farmers.

Cranswick, having members of its staff sitting on the Red Tractor pigs board, have been involved in positive discussions around its role and direction in the future, and are happy with plans for the future.

ABP noted that the increased focus on farmer support and engagement cannot be to the exclusion of other players in the supply chain, including consumers. In recent times, the balance between consumer, customer and farmer has been too far out of balance, with too much focus on the former and not the latter. Activities are underway by the **Red Tractor** board to correct this imbalance. but it should not result in farmers being the sole focus.

Lidl is happy to support this recommendation where possible. It will support this by extension of its **BRC** position on one of the sector boards.

The Co-op noted that any proposal for change ways of working would have to go through BRC (part of the ownership body) for it to consider.

Strategic Recommendation 9: The Red Tractor (RT) scheme must complete the implementation of recommendations in the Campbell Tickell report.

Recommendation 9.01: Reviewing progress with the Campbell Tickell report (page 111)

Red Tractor must publish a report on the way in which it has implemented the recommendations of the Campbell Tickell report and ensure that this is made available to farming members and to the wider farming community.

Where certain recommendations have not yet been implemented, a clear timetable for their completion must be provided in the report, and updates made available to the farming industry when these elements have been addressed.

Action: Red Tractor Board

Timescale: Initial report within 3 months of publication of the UKFAR report

	1	2	3	4	5	6	7
RT Board	Х						

Red Tractor noted that it has implemented all of the recommendations of the Campbell Tickell report and committed to publishing a report detailing how these recommendations had been implemented by May 2025. This was published early June. The scheme's governance now incorporates the recommendations made in the Campbell Tickell review.

Recommendation 9.02: A formal assessment of changes to Red Tractor (page 111)

Even though the Campbell Tickell report may address current issues concerning the governance of the RT scheme, it remains to be seen if, in the longer term, the measures in that report, together with those in the UKFAR, have successfully repaired the levels of trust necessary to create a more positive relationship between the scheme and the farming community. To this end, the sponsoring bodies for the UKFAR must conduct a formal assessment of the outcome of both reports, to determine how farmer sentiment towards the scheme has changed because of this programme of work.

Action: NFU and the AHDB

Timescale: 12 months

	1	2	3	4	5	6	7
AHDB		X					

It is expected that the independent reports being carried out by the Monitoring and Reporting Commissioner will provide information on progress. In addition, the **AHDB** is considering the possibility of further analysis on farmer sentiment towards Red Tractor in early 2026.

5.3 Summary Assessment of Progress and Engagement with the Monitoring Exercise

This section provides an overview of some of the major features emerging from the evidence submitted to the first UKFAR monitoring round. It is not intended to cover every recommendation in detail, but to draw out some key points of progress, and to identify where further progress is required before the second monitoring round next year.

Submissions to the monitoring exercise were variable in their nature and content. Many addressed the recommendation at hand, providing helpful background information and reporting on recent progress or indicating their compliance with the recommendation, either with new work or actions previously taken.

In other instances, the submissions were not as clear. Some of the graded responses to the recommendation did not entirely match the corresponding narrative statement. In others, the submission did not refer to action taken to implement the recommendation, but rather to a general view about issues with the farm assurance system. These issues had largely been addressed in the original UKFAR report so did not need repeating at this stage.

Yet others took issue with the recommendation as either being impractical or not in accordance with their business model or current decision-making structures. It will be for those organisations, and their members, to ultimately determine whether a change of approach is required to address the concerns raised in the UKFAR report. For the time being, the monitoring exercise has simply recorded the responses so that they can be compared to others across the farm assurance system.

There were also instances of submissions being notable by their absence. Three of the 4 UK Governments have yet to make a substantive response on recommendations where their action was requested, or even a progress report on their work to date. As a result, there is currently a gap in analysing progress on key aspects of the Review that it is hoped can be addressed in the second monitoring report in the Spring of 2026.

It should be noted that this was always intended to be an exercise in self assessment. It was made clear that the monitoring round was seeking information on actions taken, or progress towards actions being taken, so that the wider industry could judge whether the UKFAR recommendations were being appropriately addressed.

At the same time, it was understood that it would not be necessary for respondents to follow each recommendation to the letter. Where alternative, but equally helpful, actions had been made, in the spirit of addressing the issue at hand, we asked for them to be reported. This took account of the fact that some organisations had already implemented changes closely related to the recommendation and that it would not be necessary to reinvent the wheel. We saw evidence of such responses in a number of submissions.

The point has been made elsewhere that with the publication of the UKFAR report towards the end of January 2025, the 6 month timescale for certain recommendations would have been over towards the end of July. Whilst this is correct, the need to take action, and only then to report on what had been done, meant that the survey period, from mid-July to the end of August, fitted naturally with this timescale.

That said, it was recognised that the UKFAR recommendation timescales were, in some instances, challenging. The Commission provided an explanation of the rationale behind the timescales in the UKFAR report, principally noting the need to maintain momentum with the process of improving the farm assurance system.

A number of respondents reported that the timescales would not work for them, but that they were addressing the recommendation and simply needed a longer period in which to make progress, with some providing an indication of when the action would be taken. In other cases, the timetable for action was not clear, and a more general statement was provided, indicating that it would happen at some point in the future. It is hoped that more specific timing and action reporting will be provided by all

respondents in the second monitoring report. It would be even better if, at that stage, more of the 6 month timescale actions, across a wider range of organisations, could be reported as closed.

A number of submissions reported that actions were being taken in September or October. The cut-off point for submissions to this monitoring round was 1 September, so these actions are not included at this stage, and a report on progress is anticipated in the second monitoring round.

The different starting points for improvements to the farm assurance system were evident in the submissions received from farm assurance schemes, a point noted previously in the UKFAR report. In particular, changes had already been made by schemes in some of the devolved nations that meant that they had addressed the recommendation or had developed alternative, but closely related, approaches.

That is not to say that they were in agreement with all of the UKFAR recommendations, or did not have more work in hand, but progress appeared to have been made and seemed likely to continue. In the case of Northern Ireland, time had been taken to develop a new strategy that is closely related to the UKFAR recommendations and holds the promise that a context-specific approach to farm assurance improvements will be taken in the coming months. A report on progress will be an important element of the second monitoring report.

The nationally focussed schemes presented a more mixed response. It is recognised that some have been through a recent review and, whilst supportive of the UKFAR, need time for their new systems to "bed in". Others feel that the recommended changes are not for them, because their system is well tried and tested and supported by their members.

Red Tractor reported that it has prioritised its actions such that some have been taken, or are in hand, whilst others require further consideration or information. It has also been active in seeking engagement with other schemes on those recommendations requiring a system-wide response, and with other organisations, such as farming regulators, to consider improvements to the organisation of farm assurance audits and regulatory inspections. Others with international or multi-sectoral footprints reported that they have limited room for change with regard to some of the UKFAR recommendations but that they were mindful of the improvements being sought, for example with regard to farmer communications, and willing to address them where possible.

In some instances, responses pointed to the difference between the standards holder (the farm assurance scheme) and certification bodies charged with conducting farm audits, noting that changes could only be made by the latter bodies altering their practices. This distinction was addressed in the UKFAR report, where the view was taken that certification bodies are commissioned by farm assurance schemes, and that it is the schemes, ultimately, that have the responsibility to ensure that these bodies are acting in accordance with their requirements. It is hoped that this further clarification will enable schemes to work with their certification bodies to deliver more of the improvements set out in the UKFAR recommendations.

In general, the responses provided by the farm assurance schemes were positive and many have shown action taken to implement the UKFAR recommendations, albeit at differing paces and with differing priorities. The fact that responses were sometimes provided to recommendations with later timescales indicated that the schemes are willing to consider longer term issues as well as to seek, or maintain, improvements in the day-to-day operation of their schemes.

The real test of improvements will, however, be the day-to-day experience of farming businesses undergoing their respective farm assurance audits, together with regulatory inspection processes where the latter have the potential to overlap. To this end. it remains a strong recommendation of this stage of the UKFAR that farmers be asked directly by the UKFAR sponsoring bodies whether they have witnessed positive changes to their farm assurance processes when the second monitoring round has been completed.

The submissions from the AHDB and NFUs indicated that they are maintaining a spotlight on farm assurance developments and taking action to comply with the requirements of the relevant recommendations. Whilst as sponsoring bodies for the UKFAR, this might be expected, it is nonetheless good to see the embedding of farm assurance in other aspects of their work, including with

farm assurance schemes in their respective jurisdictions. In other instances, a first step has been to commission further research to address a recommendation (such as on imported product standards) or to engage across the system to seek agreement on how to respond to a recommendation (such as in the case of redefining the purpose of farm assurance). These steps are necessary to provide the evidence, and/or consensus, required to make certain of the recommendations work, even if they will take more time to implement than might have previously been anticipated.

It will, however, be important for this focus on improving the farm assurance system to be maintained, in light of the many other policy issues presently facing the farming industry. The second monitoring report will provide an opportunity for these organisations to demonstrate the actions they have been able to implement at that stage, together with their plan for addressing outstanding, or ongoing, work on relevant recommendations.

It was encouraging to see the detailed response provided by FSA, outlining the work it is undertaking, sometimes in conjunction with farm assurance schemes, to clarify its role in the regulatory inspection regime, how this operates with the farm assurance system and improvements on which it is working. The full results of these initiatives remain awaited, but will hopefully help demonstrate, in the second monitoring round, that regulators are willing and able to reduce the burden on farm businesses of overlapping audit and inspection regime requirements.

It was also interesting to see that the Welsh Government has appointed a new Head of Farm Assurance and Food Certification. It was previously reported to the Commission that the Welsh Government would welcome closer links with farm assurance in the principality and it remains to be seen how this development will help shape that agenda in light of emerging farming policy in Wales.

There appears to be a willingness amongst farm assurance schemes to develop technologies to assist the delivery of audits, gather data on audit performance, and to ensure that it helps to reduce the overall effort associated with the assurance system for the farming industry. Again, assurance schemes are at different stages with this work and much remains to be done to provide a consistent approach to the "tell us once" principle noted in the UKFAR report. The AHDB's Farm Data Exchange project may assist in that endeavour, and we were also informed about the AgriAudit approach to farm assurance data management. AgriAudit was therefore invited to submit its views to the monitoring exercise, and those with a bearing on the use of technology can be found in the main body of the report.

There remains work to be completed on the issue of data ownership, and whether a large scale data co-op is feasible for the farm assurance system. At the moment, individual schemes are either introducing audit portals or, where they are already available, have sometimes taken the view that it should be for farmers to decide if they wish to use such technologies, rather than this being a mandated approach. It follows that the recommendation about supporting farmers with this transition also varies in its implementation, though there are signs that work is in hand, by some schemes, to address this issue. It will take a joined up approach to encourage the use of technologies, even as basic as an audit portal, if the efficiency gains from these systems are to be realised. This will involve more farmers being able and willing to use these systems as much as it will involve auditors being required to use the information held on them before visiting a farm.

There also remains work to be done to deliver a proof of concept for alternative farm assurance methodologies. It was noted that the AHDB is supporting AIMS with the development of its Vetasure product to meet this objective. The recommendation to regularly review emerging technologies of this nature has not yet been addressed, but it was helpful that both AgriTech E and the UK Agri Tech Centre are willing to assist with this initiative when others in the farm assurance system are ready to take this step.

Progress has been reported by the AHDB on compiling a statement of direct environmental legislation, (for its mandated sectors) which was to have been refined further at a meeting with farm assurance schemes in September. The next step will be to determine, with Government and its regulators, where there is scope to achieve greater compliance by the industry, but not necessarily as part of the farm assurance system. The AHDB reported that this was a complex area of work and required further discussion with the NFUs on the best approach to take.

The possibility remains that food chain organisations relying on a farm assurance based approach to meet their reporting obligations on environmental matters might decide to adopt alternative routes, leading to further fragmentation in data collection and increased workloads for farm businesses. It is therefore important for the farming industry to support the AHDB and NFUs in their work on this topic to see if a more streamlined and coherent approach can be achieved.

Food chain businesses responding to the monitoring exercise have taken a variety of views, some noting that they already recognise performance on a variety of measures in their contractual arrangements or by others means (such as access to advice and consultancy to help improve the farm business). Other organisations took the view that the cost-sharing approach for environmental data suggested in the Review's recommendations was something that would not be supported, and it would be for farm businesses to meet reporting obligations or look elsewhere to sell their products.

This view was particularly strongly held by Sainsburys, who in correspondence with the UKFAR, felt that the setting of a premium for environmental reporting above the legal baseline was the wrong approach, because businesses "in any supply chain should be aiming to operate sustainably and improve sustainability, it makes business sense as it drives business resilience".

The first recommended step of providing greater clarity on the legal baseline on environmental matters in farming therefore looks to be helpful in determining what it is that farmers <u>must</u> do, rather than <u>what they are being asked</u> to do above this baseline in their contractual arrangements with other food chain businesses. It is not the case that such arrangements are wrong, or that farmers may not wish to deliver them to fulfil a contract, but at least information to support the decision taken by the farmer might be clearer and the reward mechanism, whatever that might be, for any additional work or data of value, can be more transparently established and agreed.

This principle extends to the concept of "earned recognition" where the Commission called for greater clarity around arrangements with Governments and their regulatory agencies. As yet, there is no clear indication that the concept of "earned recognition" is being progressed by DEFRA, and we await further news on this aspect of the Review's recommendations. Further information from DAERA and the Scottish Government would also be welcome during the second monitoring round.

The regulatory agencies are, however, taking steps in this direction, as noted earlier with the work of the FSA and the Environment Agency, though a complete picture on these developments is yet to emerge. Other agencies, such as the NRW, though not having a current policy with regard to farm assurance, would welcome the opportunity to understand better how farm assurance scheme assessments are conducted and non-compliances managed. The door is open for further engagement should farm assurance schemes not already working with the NRW wish to take up this offer.

The UKFAR report also made a number of recommendations about communications with farmers and the culture change necessary in some farm assurance schemes to ensure that the "farmer voice" was taken into greater consideration. As noted in the report, this was not the case amongst all schemes, but it was required in some instances to rebuild trust between the schemes and their farming constituencies. We received detailed responses setting out the various ways in which farm assurance schemes interact with their farming members, with the prospect of improvement where this had not previously been regarded by farmers as a strength of the scheme.

There were also indications that the issue of culture change had been taken on board, though much will depend on how this extends to the practice of farm assurance, the future avoidance of "mission creep" and the implementation of earlier recommendations arising from the Review about, for example, the nature and conduct of farm assurance and the setting of scheme standards.

Although the recommendation about a "loose federation" of farm assurance schemes is not included in this report, given the longer term timescale for implementation, we are aware that early stage discussions are taking place about the feasibility of this approach and we await the results with interest.

It was also evident that consideration is being given to the ownership arrangements for Red Tractor, though it was disappointing to see that the BRC would not engage in the Review to help address various improvements to the scheme where it could play a key role. It is hoped that, seeing the work now in progress, the BRC might wish to engage, even at this late stage. Once again, the door remains open

to its participation in helping to deliver a renewed approach to farm assurance that will support, equally, all parts of the agri-food system.

More positively, it was encouraging to see that Red Tractor has fully implemented the findings of the Campbell Tickell report. It now rests with the NFUs and the AHDB to assess, for the next monitoring round, whether the changes in the scheme's governance have helped to begin a more positive relationship between the scheme and the farming community.

Section 6. Next Steps

6.1 Preparing for the Second Monitoring Round

A second monitoring round is scheduled under the terms of reference for this stage of the Review. Respondents will be asked to update any actions taken since their submission to the first round of monitoring. A number of reported actions were to take place towards the end of 2025 and an update on these items will be sought.

In addition, respondents will be asked to provide further information on recommendations that were to be completed within 12 months of the publication of the UKFAR report.

The second monitoring round will provide an opportunity for respondents to report on the implementation of recommendations that have, for either internal or external reasons, not met the 6 month reporting deadline. It is expected that the additional time for implementation will enable these actions to have been completed or for good progress towards completion to have been made.

Responses will be sought, again, from organisations that did not respond to the survey conducted for this report. It is hoped that these organisations will play a full role in the reporting exercise at that point so that recommendations where they have a role to play can be addressed and a full report to the farming industry can be made on the actions they have taken.

6.2 Disseminating the Results of the Monitoring Exercise to the Wider Industry

Whilst the monitoring exercise was commissioned by the NFUs and the AHDB, it was always intended that it would be published so that the wider farming industry might gain a view about progress with the implementation of the UKFAR recommendations.

It is important to put on record that the organisations commissioning the monitoring exercise have not had any editorial input to this report, and that their submissions to the exercise have been treated in the same way as others. In this way, the report has remained independent of the commissioning bodies.

It should be noted, also, that the monitoring exercise is based on self-assessments by responding organisations and that their submissions, including their indication of the status of their work on the recommendations, form the basis of this report. It is too early to tell whether or not the actions taken to date will result in changes being witnessed by the farming industry in the nature and conduct of the farm assurance system.

Nonetheless, it is hoped that the progress shown in this report will indicate a willingness of many of the respondent organisations to improve the system as a whole, and to enable the farming industry, in due course, to benefit from the changes being made.

Annex 1: The Characteristics of Good Farm Assurance

The characteristics of good farm assurance identified in the UKFAR Report were as follows:

Strong leadership - clarity of purpose - those schemes showing greatest success in delivering value throughout the food system had clear objectives - making a well understood and transparent offer on the guarantees offered by scheme membership and maintaining their focus through strong leadership and a refusal to be sidetracked by political expediency. Several respondents we spoke with described this as the importance of a strong "controlling mind".

Regular review - farmers reported the best experience where schemes were prepared to flex to reflect developments (e.g. to offer best practice in inspections, or to reflect the developing legislative framework). This kind of flexibility is a factor in securing producer confidence and avoiding a sense of "mission creep", where standards constantly accumulate but those that are no longer relevant are not removed at the same pace.

Transparency - we heard a great deal about the importance of transparency – offering clarity about how standards are set at whose request and why, and about the importance of honest engagement of all interested parties, to ensure that standards are practical and to avoid the scope for duplication.

Collaboration - we heard very favourable feedback about those instances where different players within the food system had collaborated to share standards and assurance processes – whether this was Government relying on assurance schemes to meet statutory requirements, or retailers relying on established schemes for assurance. Where this had been possible, those involved spoke about the ways in which clarity about standards, implementation, enforcement and transparency had helped to build necessary trust.

A focus on delivering value to participants - many of those we spoke to talked about the ability, or otherwise, of schemes to deliver a market premium to farmers. This was especially difficult in those sectors (e.g. combinable crops) for which there is no consumer-facing label, or where there is poor consumer recognition of the value of assurance schemes. The best schemes focus on trying to deliver value - whether through a price premium or using data and advice on best practice to enhance farm performance. They also focus on the scope for scheme membership to improve market access, and to strengthen product integrity, including in export markets (although we heard from some that there is greater scope to think strategically about assurance in relation to exports).

Consistency and continuity - scheme participants valued an approach which allowed data to be transferred only once, where inspection practices were clear and predictable and where schemes were able to build a picture of the circumstances of individual businesses. Scheme portals have played an important first step in offering this kind of consistency, but there was an appetite for them to go further. And there is a significant appetite for all the players engaged in farm inspections to make greater efforts to co-ordinate their activities and to take proper account of information provided pre-audit to reduce the time burden of audit visits.

A clear, transparent and proportionate approach to enforcement - we heard compelling accounts from farmers about the extent to which a binary 'pass/fail' approach to inspection contributed to the overall stress of the farm assurance process. We also heard from Government Departments and Agencies about the importance of clarity about enforcement and penalties in deciding whether to rely on schemes for official/regulatory purposes. Schemes with mature and transparent policies on enforcement and a proportionate approach to penalties fare best on both counts.

Healthy competition - farmers and other consultees favoured a degree of choice over which scheme to join as offering a stimulus to improve scheme conditions for participants. By contrast, where participation in a particular scheme had effectively become a gateway to market participation, farmers often felt less confidence that schemes would carry out this improvement.

Annex 2: The 56 UKFAR Recommendations Summary Table

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Annex 3: Monitoring and Reporting Phase Terms of Reference

The Terms of Reference for the Monitoring and Reporting Phase of the UKFAR were as follows:

- 1. To monitor, with the assistance of an administrative team and (if required) occasional specialist input from other UKFAR Commissioners (for initial access to organisations, for example) the implementation by the identified organisations of the 9 strategic and 56 operational recommendations contained in the UKFAR Report (published January 2025)
- 2. To initiate contact with the identified organisations to determine:
 - a. Their initial understanding of the UKFAR report and the recommended roles and responsibilities assigned to them
 - b. Their understanding and acceptance of the role of the Monitoring & Reporting Commissioner
 - c. The name of a contact person(s) with responsibility and authority to act on behalf of the organisation in coordinating their response and reporting back to the Monitoring & Reporting Commissioner
 - d. Their view on any major obstacles to the implementation of assigned UKFAR recommendations and how these might be addressed (and not avoided)
 - e. A stock-take of recommendations where the identified organisation believes they are already compliant and can provide written evidence to this effect
- 3. To maintain, with the assistance of the administrative team, a record of assigned recommendations and actions already taken to comply, actions planned within the UKFAR Report's identified timescales and actions that would lead to compliance but might miss the specified timescale. Updates on these actions will be required from the identified organisations by way of an online reporting template to be assembled by the administrative team
- 4. To use Items 2 and 3 above to compile two independent reports for the sponsoring bodies on progress with the implementation of the UKFAR Report recommendations, together with steps taken to encourage further action, more timely action or improve coordination of effort in the implementation of group-related recommendations. The reports should be produced in the early Autumn of 2025 and the early Spring of 2026, to allow time for the 6 month and 12-month target recommendation deadlines to pass, for evidence of progress to be gathered and for the reports to be compiled
- 5. Once the reports at Item 4 have been submitted to the sponsoring bodies, to publish an independent "comply or explain" progress report, on the same two timescales as in Item 4 above, so that information about actions taken, missed through timing or avoided by the identified organisations is made publicly available
- 6. To engage, independently and actively, with press and other media organisations on progress and issues arising from the publication of the reports at Item 5
- 7. Where UKFAR recommendations require a group response, to encourage those organisations involved to coordinate their efforts, to identify a lead organisation/person and an appropriate reporting mechanism back to the Monitoring & Reporting Commissioner so that actions and updates are provided to the administrative team in a timely manner
- 8. To end the appointment as Monitoring & Reporting Commissioner on publication of the 12-month public report (Item 5 refers) and on agreeing with the sponsoring bodies whether such an appointment should continue further terms to be agreed or should be concluded

Annex 4: Monitoring and Reporting Commissioner Biography

Dr David Llewellyn CBE FRAgS FlAgrE was the Principal of Harper Adams from 2009 to 2012, and then, when Harper Adams received university title, its first Vice-Chancellor from 2012 until his retirement in 2021. From 2018 to 2021, amongst other appointments, he was Chair of Guild HE, one of the two higher education national representative bodies.

David is Chair of the Lantra Board, Patron of the Douglas Bomford Trust and was a member of the Expert Panel for the 2022/23 Independent Review of Labour Shortages in the Food Supply Chain. In 2024 he was the Lead Commissioner for the UK Farm Assurance Review.

David is a past President of the East of England Agricultural Society, a Fellow of the Royal Agricultural Society and a Fellow of the Institution of Agricultural Engineers. He was the recipient of the 2022 IAgrE Award for Contribution to the Land Based Sector.

In 2022, David was also awarded a CBE for services to Higher Education, the Agri-Food Chain and Rural Industries.

Annex 5: Operating and Independence Principles for the Monitoring and Reporting Phase

The UKFAR process was conducted in accordance with a set of operating and independence principles agreed at the start of the Review between the sponsoring bodies (the NFUs and the AHDB) and the Commissioners. To maintain the independence of the UKFAR process the same principles were agreed between the sponsoring bodies and the Monitoring and Reporting Commissioner for UKFAR Phase 2.

The agreed principles, as amended for this Phase, are set out below:

Independence

 Phase 2 of the UKFAR, and its conduct, must have, and maintain, independence from the commissioning bodies (the farming unions (NFUs) and the AHDB). The Monitoring and Reporting Commissioner has been selected for his independence, and maintaining the independence of the process and results will be key to the credibility of the Monitoring and Reporting exercise and of the commissioning organisations

Protecting the interests of the NFUs and the AHDB

- 2. The bodies that have commissioned this Phase of the Review have legitimate interest in the following areas:
 - Cost, financing, and value for money. As the funding bodies for the Review, the NFUs and the AHDB will need to be assured that the work is affordable, that the funding requirements are predictable and that they offer value for money
 - Coverage, stakeholder engagement, timeline, and direction of travel. It will be important to offer full transparency on these points: although the conclusions of the Commissioner and the Monitoring and Reporting exercise must be independent, the bodies that have commissioned this Phase will need to understand the process by which those conclusions have been reached, the breadth of stakeholder coverage, and the expected timeline for completion of the exercise

Operating Principles

- 3. With points 1 and 2 in mind, this Phase should follow these rules:
 - The NFUs and the AHDB should be involved in the process for the **selection of the Secretariat** although the final decision/choice of Secretariat shall remain with the Commissioner
 - The Secretariat, once selected, will report monthly to the NFUs and the AHDB on financial outgoing and commitments, but other aspects of reporting will remain the responsibility of the Commissioner
 - The Commissioner will report as required to the Farm Assurance Review Leadership Group (FARLG) on his activities. The role of the FARLG will be to provide assurance and observations given the independence of this Phase, and it is not intended that the FARLG will steer the Commissioner's work
 - Although it is intended that the FARLG shall be the main vehicle for contact with the Monitoring and Reporting Commissioner, the Boards and Office Holders of the commissioning bodies may at any time request updates from the Commissioner
 - The Commissioner will liaise with the respective communications teams of the NFUs and the AHDB to ensure that they remain aware of the Commissioner's activities and contacts with the press and other media, but such contacts, and their contents, will not be prescribed by the NFUs and the AHDB and will remain the responsibility of the independent Commissioner. Information about this Phase released by the NFUs and/or the AHDB will make clear that the Monitoring and Reporting exercise remains independent of the commissioning bodies, but that it will receive

evidence to support the Monitoring Reports and their conclusions from, amongst others, the commissioning bodies and, if required, their members

Annex 6: List of Organisational Participants in the Monitoring Exercise

- 1. ABP
- 2. Agri-Audit
- 3. Agriculture and Horticulture Development Board
- 4. Agriculture Industries Confederation
- 5. AIMS
- 6. Anglia Free Range Eggs
- 7. Arla Foods
- 8. Barbers Cheese
- 9. British Egg Industry Council
- 10. British Sugar
- 11. Co-op
- 12. Cranswick
- 13. Dairy UK
- 14. DEFRA
- 15. Food Standards Agency
- 16. Global GAP
- 17. LEAF
- 18. Lidl
- 19. Livestock and Meat Commission Northern Ireland
- 20. Louise Manning on behalf of the DEFRA data group
- 21. Marks & Spencer
- 22. Morrisons
- 23. National Farmers Union
- 24. National Farmers Union Scotland
- 25. National Farmers Union Wales
- 26. Natural Resources Wales
- 27. Organic Farmers and Growers
- 28. Quality Meat Scotland
- 29. RABI
- 30. Red Tractor
- 31. RSABI
- 32. RSPCA Assured
- 33. Scottish Quality Crops
- 34. SEDEX
- 35. Soil Association
- 36. TIAH
- 37. UK Flour Millers
- 38. Ulster Farmers Union
- 39. Welsh Beef and Lamb Producers
- 40. Welsh Government

The responses from LMCNI, SEDEX, AIC, BEIC, LEAF, and UK Flour Millers were received as written documents, as opposed to an official response to the monitoring survey. Responses and updates from several individuals commenting on the monitoring round are not provided in the above list, but their contributions were equally welcome.

Annex 7: Supplementary Questions and Responses by Respondent Group

Respondents to the monitoring survey were asked a series of additional questions to provide further context for their contributions about progress with the UKFAR recommendations. The questions were grouped according to the respondent categories outlined in Section 2.3 and are presented in this Annex in accordance with those respondent categories.

Farm Assurance Schemes

What aspects (either positive or negative) of collaboration and coordination with other farm assurance schemes (or other relevant organisations) have you encountered when addressing the UKFAR recommendations?

Global GAP - through the benchmarking programme, collaboration and coordination takes place.

OF&G – CB's are there as cash cows to multinational businesses. They are efficient but now resent investing due to falling returns. Organic CBs are miles behind the game and not fit for purpose. None ever cooperate and never will. Everybody wants to muscle in, but none through the right objectives. We need an inspection body for everything.

SQC - SQC have no additional comments to add on this matter.

QMS - have found some of the collaboration from both other assurance bodies and levy boards challenging due to the lack of collaboration with devolved organisations. On multiple occasions, meeting dates have been dictated, at short notice, in the middle of Scottish holidays, with no options for other dates which is frustrating and doesn't allow them to participate as well as they would like.

QMS have asked for meetings to be set by doodle poll and dates considered further in advance to support their engagement. The recommendations in some areas being muddled between certification body and farm assurance also doesn't help identify and clarify who is expected to undertake what.

The UKFAR timelines set were unrealistic and have placed unacceptable levels of stress on us as a small team with already full workloads. This workload issue is greater in the devolved areas as they, by nature, have smaller teams.

For QMS, the confusion of some recommendations at whether they are aimed at QMS as a levy board or standard owner has been a challenge. QMS have also been disappointed by some stakeholder's attitudes to some standard owners, deliberately being left out of meetings that they have activity within, and negative comments being made in public documents.

Red Tractor - Our ongoing liaison with SQC, LEAF and the devolved beef and lamb schemes continues to be positive and is further informed by the recommendations of the UKFAR

For example, with SQC they have been working to maintain seamless membership of the Renewable Energy Directive, which provides an additional market for UK grain growers.

Red Tractor met with the RSPCA after the publication of the UKFAR to discuss opportunities for collaboration on inspections to reduce audit burden on farmers. However, RSPCA were less open to this suggestion, as they see the independence of RSPCA inspections as a USP.

Challenges that Red Tractor encountered when speaking with other organisations have been the different interpretations of the UKFAR recommendations and a sense among many that this is a review of Red Tractor, not of all assurance schemes, and therefore not relevant to them.

In addition, they have also found that some customers/retailers are reluctant to engage on the topic of UKFAR as they see it as a distraction and not a priority for their business.

WLBP - Since its inception and publication they can't say there has been a collaboration with anyone in the true sense of the word which has concluded in a specific outcome. They have however had numerous useful discussions with industry and government stakeholders and farmers that may help

shape some of our intentions moving forward in Wales. They have been a party to a framework agreement between Livestock Assurance schemes in the devolved nations of the UK. They report that in their opinion that it has had limited success, due to the perception that the devolved nations were not regarded as relevant as they should have been.

What can be done to improve collaboration and coordination across the farm assurance system and how would you suggest that this be achieved?

Global GAP - more schemes benchmarked with Global GAP will improve industry collaboration and coordination.

OF&G – stated there is a need for an inspection body for everything. Not for profit organisations should handle all inspections and training. They feel that UKAS is not needed, as it achieves little apart from increasing costs, unnecessarily. The organic sector needs deregulating and auditing like every other scheme and a new regenerative farming scheme is needed to be run independently to increase production, while improving biodiversity, wildlife and quality. It is possible if soil health is included but will never happen with the current structure.

SQC - feels that there is adequate collaboration and coordination but agrees that improvements could be introduced to benefit all. The set up of a "farm assurance federation" would assist with this if all parties are committed. There must also be recognition that schemes can only align so far when considering devolved nations and regulation; they have different markets and conditions.

QMS - think this area is much more complicated than most people seem to think. As recommendations in the UKFAR report showed there is little understanding from some stakeholders as to the difference and roles of standard owners, and certification bodies, and how that contractual relationship works.

This is further complicated by different approaches in the devolved countries, for example with QMS as both a levy board and a standard owner which is a NDPB. This means governance is set in a different way and decision making must be set as per a framework agreement and scheme of delegation.

Red Tractor - the meeting of the "loose federation of assurance schemes" in October is an opportunity to discuss and secure collaboration between schemes. They would welcome the support of the Monitoring and Reporting Commissioner in helping to secure buy-in from everyone in attendance.

WLBP - for collaboration and coordination to succeed, each autonomous scheme will need to be treated as an equally important contributor.

AgriAudit - the biggest step to improve collaboration would be for farm assurance schemes to commit to a single shared portal, rather than each operating its own. At present, duplication across multiple systems wastes farmers' time and adds unnecessary cost. A "tell us once" model - where compliance data is uploaded once and then recognised across schemes and regulators - would be the most effective way to demonstrate real coordination.

What action(s) are you taking to connect with relevant government departments and/or regulatory agencies to help ensure that overlaps in farm assurance audits and government/regulatory agency inspections are removed?

Global GAP - is a member of various organisations. IAF, EA and others.

OF&G - noted that they are trying to launch their own "not for profit" regenerative agricultural scheme, but it is hard as most people are protecting themselves and are not in it for the good of the industry.

SQC - refer to their responses under Recommendations 2.02 and 2.08. SQC hopes that through the UKFAR and related recommendations regarding collaboration with relevant government departments and regulatory bodies, these agencies will place greater emphasis on working with farm assurance schemes.

QMS - as an NDPB this is something they feel that happens naturally for them.

Red Tractor - met with Daniel Zeichner, Baroness Hayman and the Welsh Government to discuss opportunities for earned recognition on farm inspections. They also have been engaging with the European Commission and Department for Transport to ensure their continued accreditation to the renewable energy scheme, enabling an additional market for UK grain growers. Red Tractor staff have engaged with and been involved in a UK Food Strategy development and attended a multi stakeholder workshop. Jim Moseley has liaised with Minette Batters on the Farm Profitability Study.

Red Tractor's Board Director, James Russell, has been appointed to the TAC to review the impact of future trade deals on the UK. Red Tractor has also engaged with DEFRA on mandatory animal welfare labelling to reduce demands on the food supply chain. They plan to recruit a Senior Public Affairs Manager later this year to oversee engagement with government and public sector organisations.

Despite Recommendation 5.1 in the UKFAR for government agencies to identify a clear principle point of contact and engage more with farm assurance schemes, they have seen no evidence of this and have not been approached by any agencies in relation to the recommendation. This makes it very challenging for Red Tractor to progress in this area.

WLBP - this has already been addressed in previous responses and is based on the principle of mutually recognised "earned recognition" and will need to treated as such by regulatory authorities. WLBP will resist any inferences of acting as a "policeman" for regulatory bodies.

Soil Association – noted that they have engaged in this dialogue for many years but have seen little progress.

What data/evidence to do you hold on farmer sentiment about the changes you have made/are making in response to the UKFAR recommendations? Are you prepared to share this data/evidence at this stage of the UKFAR monitoring exercise?

Global GAP - https://www.globalgap.org/news-and-press/news

OF&G - 30 years' experience and knowledge of the assurance industry with global experience. It is so hard to "knock down" walls and silos, but we are happy to share it all for free to improve our industry.

SQC - SQC does not hold any specific evidence on farmer sentiment with regard to our response to the UKFAR recommendations. Since the publication of the report, SQC has made mention of it within 2 newsletters which have been circulated but we have not received any specific feedback - positive or negative.

SQC have been surprised at the lack of interest from our farming press and farmers. They have invited engagement, but there appears to be no desire within the membership for direct involvement. They have discussed the topic at all SQC board meetings which have taken place since the announcement of the UKFAR and are aware that SQC does not appear to come in for the negative coverage that is seen for some others within the UK farm assurance system.

SQC have also asked for feedback from SQC assessors (that they have received from farmers) and in general, it has been positive towards the SQC scheme. SQC growers appear to appreciate the simplicity of the scheme, the SQC structure and governance model.

One other area of concern for SQC is the continued confusion around who does what - the differences between a farm assurance scheme (i.e. the scheme owner) and its certification body and the difference between inspections and audits (i.e. legislative versus voluntary). SQC noted that they have worked hard over the last three years to bring more visibility to SQC and have it recognised as the Scottish Quality Crops Assurance Scheme - not just a farm assurance scheme. This is perhaps something which could be addressed via this review.

QMS - none at this stage, as it is too early, but QMS is happy to share when they get to that stage. QMS completes an annual QA survey: they have the 2024 results and will be due to conduct a 2025 survey later this year.

Red Tractor - since the publication of the UKFAR, Red Tractor has conducted the following:

- A survey amongst Sector Board members. They are currently analysing the results and would be willing to share these with the Monitoring and Reporting Commissioner once complete. A similar survey was conducted by Campbell Tickell as part of their Review in 2024
- 2. A post assessment survey which is sent to all Red Tractor members following a Red Tractor audit. This survey includes questions related to perceived transparency; assessment efficiency; value and experience. The latest data shows a positive trend across all these measures since Q3 2024. Below are the figures for Q3 2024 compared with the figures for Q3 2025 to date.

Perceived transparency:

- Positive perception ("Good" + "Excellent") rose from 57% → 66% (a 9% overall improvement)
- Negative perception ("Poor" + "Very Poor") fell from 20% → 13% (a 7% improvement).

Perceived assessment efficiency:

- Positive perception ("Good" + "Excellent") rose from 61% → 63% (a 2% overall improvement)
- Negative perception ("Poor" + "Very Poor") fell from 13% → 10% (a 3% improvement)

Perceived delivery of value:

- Positive perception ("Good" + "Excellent") rose from 42% → 46% (a 4% overall improvement)
- Negative perception ("Poor" + "Very Poor") fell from 26% → 21% (a 5% improvement)

Overall experience of Red Tractor membership:

- Positive perception ("Very Positive" + "Positive") rose from 50% → 57% (a 7% overall improvement)
- Negative perception ("Very Negative" + "Negative") fell from 21% → 14% (a 7% improvement)

In addition, Red Tractor has issued a request for proposals for research agencies to work to ensure they have accurate, credible and informative insights to help measure farmer sentiment and inform work to build farmer trust. The deadline for proposals is mid-September. They anticipate that part of this work will include more comprehensive farmer sentiment research, including focus groups.

WLBP - We have no evidence to suggest that the farmer sentiment that was reported in the UKFAR reflected a high proportion of members of the FAWL scheme in Wales.

Please provide any other comments relating to the UKFAR and the current monitoring exercise that might assist with the implementation of the UKFAR recommendations.

OF&G - "We need a complete overhaul of all assurance schemes. It is a complete mess, although Red Tractor is a good brand, but it needs a total rethink. We need to cut inspections and let's merge all inspections into one to save time and money. Let's have one independent certification body, a brand that commands a premium and that pushes down the line to the supermarket shelf. DEFRA could save a fortune by pushing this through but there are very few people out there with the knowledge and experience to deliver this. We are happy to help. We think the UKFAR has missed many salient points."

SQC - would only ask that we are kept up to date with next steps and that consideration be given to a greater sharing of good practice – rather than what we perceive as a focus on issues. SQC remain concerned that due to the focus on "UK farm assurance" as a whole, all schemes are being seen as at fault, when this may not be the case. SQC agree though that through greater collaboration and sharing of ideas, improvements can be made by all – and to the benefit of all.

QMS - this monitoring exercise has been extremely painful due to the way it has been presented. As we had already undertaken our own monitoring exercise, we have effectively had to duplicate the information in here. As the technology hasn't always been stable QMS had to dedicate a full day and late night to compete this in one sitting - not a great use of time. We have also found the communication

from Promar a little insensitive - when a deadline is set, we do not need multiple emails telling us to complete or asking us why we haven't completed it when the deadline is still several days away.

Red Tractor - it would be helpful for the UKFAR to provide examples of good practice so that it's clear for farm assurance schemes and all stakeholders what good looks like.

WLBP - supports the process relating to the UKFAR if this does not result in a watering down of the overall integrity of the assurance process. WLBP notes that participation in this process is time consuming and hence costly and has been initiated because of some poor management and decision making by some assurance schemes regionally within the UK. This has resulted in significant unrest among some of the producers in these regions. WLBP is concerned that due to this unrest among producers, some less robust schemes with minimal assurance expectations are being proposed.

WLBP remains concerned that the process could still result in a contagion of reputational risk. WLBP believes its farm assurance schemes is a robust and regionally tailored assurance model that embodies the values of transparency, farmer trust and market credibility.

The UKFAR presents an opportunity to evaluate assurance systems through producer-driven governance, practical technological and digital solutions, and clear value driven communication. WLBP stands ready to collaborate in co-designing the reform-actioned in Welsh livestock realities and supportive of UK-wide trust.

Soil Association - some of the recommendations of the UKFAR are challenging or not relevant, due to the legal underpinning of basic requirements for organic standards and certification.

The AHDB

What measures have been taken to join up the responses of the AHDB and other UK Levy Boards when addressing the UKFAR recommendations? Have these measures been effective and, if not, what would be your suggested approach to make them effective?

The **AHDB** - representatives from QMS, LMCNI and HCC were invited to the farm assurance scheme roundtables, and they have also been invited to the FALRG meetings. The AHDB has also held individual conversations as appropriate. Each levy board faces different dynamics and the AHDB also recognises that the red meat assurance schemes meet regularly (two of which are delivered by the relevant levy board).

What steps have you taken to engage with your respective government departments and regulatory agencies to address any overlaps in the farm assurance audit and regulatory inspection requirements?

The **AHDB** - have initiated regular meetings between the NFU, the AHDB and DEFRA and have shared progress updates and the outputs from the farm assurance schemes roundtable held in May. They are awaiting DEFRA's formal response to the UKFAR recommendations to ascertain where opportunities exist for earned recognition.

Industry Regulators

What steps have been taken with your respective regulatory agencies to ensure that there is greater clarity around their engagement with the farm assurance system?

NRW - Prior to the meeting with UKFAR on 2 June 2025 and this feedback, NRW has not been approached in relation to the Review. NRW has a long-standing relationship with Farm Assured Welsh Livestock, with regular meetings and have provided training for assessors. We would welcome the opportunity of developing similar engagement with other farm assurance schemes who operate in Wales.

Red Tractor Board

What progress has been made, from the perspective of the RT Board, on addressing the relationship between the Ownership Body and the Board, to ensure that their respective roles and responsibilities are clear to all concerned?

Red Tractor Action Plan (March 2025)

- Red Tractor welcomes the UKFAR recommendation that the RT Board is reaffirmed as the primary
 governing body for the organisation
- The RT Board also welcomes the recommendation that the owners of the scheme must show greater and more active leadership
- The RT Board is committed to consulting with the Ownership Body as to how to progress this
 recommendation. Discussions started at a meeting of the Ownership Body on 18th March 2025 and
 will continue at meetings over the coming months

Progress

- The RT Ownership Body announced the appointment of Alistair Mackintosh as Red Tractor Chair on 23 May. At the time, it also accepted the recommendation that it should take a more active role and "will support the Chair as the AFS Board considers the recommendations of both Reviews"
- Since his appointment, the Chair has had meetings with some of the Ownership Body representatives and will meet more in September to discuss. Changes in the AHDB leadership and other priorities within farming bodies have taken priority

DEFRA Data Group (Food Data Transparency Partnership)

What can be done to ensure that farm assurance is considered as part of farming and food chain data developments within policy making?

DEFRA Data Group - the industry/academic members of FSA and DEFRA committees, and work going on with IGD etc. need to make sure that farm assurance is central to discussions and any concerns over duplication of data requests from farmers. The Batters Profitability Review needs to reflect on their recommendations and the implications for farm assurance.

TIAH

Where else do you think that TIAH might have a role in supporting the implementation of the UKFAR recommendations?

Inspection as a career path - an Auditor Job Profile has been written, together with input from the Red Tractor team. Filming of a case study took place in August and is currently being edited prior to the whole profile being published on TIAH's careers section of their website in the next couple of weeks. It will appear here when it is complete: https://tiah.org/job-profiles

Risk based inspection - an additional area that TIAH is working on is to support farmers through the creation of one set of training resources accessible by all farm assurance members to assist them in avoiding the most commonly occurring non-conformances. It is envisaged that this content will be signposted from audit scheme owner websites.

Supporting farmers in a digital world - TIAH would also like to support farmers in a digital world, providing signposting to relevant training to help farmers increase the take up of current technologies used within the audit process. This could be a "learning hub" hosted on our learning portal.

Combinable Crops Sector

What steps are you taking to explain to, or update, the farming industry on the steps being taken to assure the standards of imported grain products?

AIC

- AIC Webinar
- Podcast
- Website FAQ
- Supply Chain Round table discussion with NFUS and NFU

AIC has detailed information freely available on its website which explains how crops are traded globally, why crops are imported, and how equivalent assurance schemes and rigorous testing mean crops from overseas are verified as meeting the same legal food and feed safety standards as UK-grown crops.

It is imperative that any crop imported to the UK from overseas meets the same legal food and feed safety standards as domestically produced crops. This requirement is written into legally binding contracts between parties trading grain and other crops.

Crops grown in another country are also typically covered by an equivalent international trade assurance scheme which confirms they have met the same legal food and feed safety standards as domestically grown crops.

Further information is available via the following link:

AIC | FAQs: Standards for traded crops imported to the UK explained

UK Flour Millers - in 2023, UK Flour Millers produced a position statement regarding the milling sector's use and assurance of imported wheat. This was communicated to relevant supply chain stakeholders and the farming press. This statement is being reviewed to ensure it continues to reflect the state of play.

What impacts on assurance of imported grain products appear likely to you from recent trade agreements struck by the UK Government? How are you intending to address them, and how do you plan to communicate your actions across the food supply chain?

AIC

Australia–UK FTA (since May 2023)	80,000 tonnes/year duty-free quota; tariffs eliminated over 4 years
Ukraine–UK Partnership Agreement (effective)	Full tariff-free trade on wheat and other grains until at least 2029
UK-EU Trade Reset (May 2025)	SPS/checks removal eases wheat imports from EU
India-UK FTA (signed July 2025)	Not yet clear if wheat is included
Turkey–UK FTA (ongoing)	Negotiations underway; wheat not confirmed

Imported wheat meets high assurance standards: aside from Red Tractor (for UK-grown grain), imported grains often go through even more rigorous testing - sampling for contaminants, pesticide residues, mycotoxins, and third-party oversight - often at the seller's expense.

Multiple assurance schemes exist: TASCC, GAFTA, and other recognised schemes support traceability, quality verification, and food safety for imports.

Contracts and international standards enforce consistency: Legal requirements in supply contracts and trade assurance schemes ensure that imports adhere to UK safety thresholds, regardless of origin.

Assurance is unlikely to be impacted by trade agreements between the UK government and other countries, as there is a network of assurance schemes worldwide, with many being connected by a reciprocal recognition of similar standards and practices. This is how legal food and feed safety standards are upheld from country to country. These robust international standards have been refined over many decades, ensuring that both domestically produced and imported crops meet the same legal requirements.

The AIC communicates with its members daily and will consult with them to ensure the industry is accurately represented.

UK Flour Millers - UK milling wheat and flour plays a significant role in national food security. This is a message that UK Flour Millers highlights to government on a regular basis. We advocate for productive UK agriculture and highlight to government the economic and food security impact of displacing UK flour production. We regularly report and discuss these actions with relevant supply chain stakeholders.

Food Chain Businesses/Industry Representatives

If you operate a farm assurance scheme as a "bolt-on" to the use of another scheme, what is your reason for doing so and what does it add to your commercial offering to (a) your supply chain and (b) your consumers?

Barbers Cheese - We bolt on our own standards and the certification audits to these standards at the same time as the Red Tractor audit. Yes - it adds to the proposition, and we can reward our farmers with a higher milk price as a result.

M&S - M&S Select Farm standards underpin our "food offer", are a market differentiator and allow us to go further and faster in standard developments than Red Tractor Standards have historically delivered. We will continue with our own standards.

Cranswick - N/A; but we do operate our own welfare assessments and run the TWA scheme internally.

Dairy UK - Dairy UK operates the DTAS scheme which is part of the dairy sector assurance chain.

Anglia Free Range Eggs - RSPCA is an additional requirement to Lion, required of all supplying farms due to customer specification requirements for which the majority of our products are supplied.

Supply chain: We enjoy a long-term retail contract (5 years) which includes a feed linked tracker.

Consumers: enjoy product with assurance of Food Safety (Lion) & animal welfare (RSPCA) and two of our customers have bolt on standards: Tesco and M&S. These are not particularly onerous but just require another audit - but more paperwork for the packer auditor than the farm. Both customers require the completion of KPI (outcome/measure) data monthly/quarterly with flocks' statistics as a measure of welfare objectives. This includes mortality, antibiotic usage etc. This is time consuming with each using their own platform. This is in addition to Lion KPI metrics.

Morrisons - Farm assurance schemes, including Red Tractor cannot be agile or responsive enough, soon enough, to changing consumer and customer demands and expectations. If they were, bolt on standards would not be necessary. The industry needs to recognise what other schemes in other countries are delivering (e.g. Bord Bia/Origin Green) and come together to find a way to deliver these.

British Sugar - We don't operate a farm assurance scheme as a bolt-on.

Co-op - additional requirements are a business decision and driven by our own priorities. We work with our farmers to deliver them, which can include incentives.

Arla - we operate farm assurance schemes, but as 'stand-alone' and not a 'bolt-on'. Our reason for doing it is to align our farmer owners from all countries, manage our risk and fulfil our commercial obligations (and of course, create a point of difference between us and our competitors). We also have a UK specific customer welfare programme - higher level animal welfare and continuous development.

How best do you believe that new mandatory reporting requirements within the retail and processing sectors could be delivered if not through the farm assurance system (for example, if the scope of the system became more focussed on food safety, animal welfare and good food production practices)? What impact would this have on your relationship with the current farm assurance system and what approach would you then take to obtain the mandatory reporting information you require?

Barbers Cheese - we would need to see what evolved, but we would be comfortable with mandatory reporting.

M&S - continue as is, with Red Tractor as a foundation of our own M&S Select Farm Standards.

Cranswick - keep it simple, the best way is via the farm assurance system, do not underestimate the additional complexity of linking to other systems on a large scale.

Dairy UK - this is a complex area and without a detailed explanation of what mandatory reporting requirements are being referred to and the alternatives open to the sector, then it can be presumed that farm assurance is the only appropriate solution.

Anglia Free Range Eggs - hard to imagine an effective system for collating information outside of the farm assurance system, due to sheer number of sites involved & resource required. The resource also required to process detail from that many sources would be considerable. If a generic reporting system was not accepted by all, then we would still be operating multiple systems. Some customers are not interested in such reporting, whilst others are. Each have their own requirements as retailers and want to demonstrate a point of difference, where they take an interest in their supply base with trusted suppliers. We can't see this working. Collating the info is generally more onerous for the packer in our case, as we try and make the request for data for the farms as pain free as possible.

Morrisons - mandatory reporting requires robust, reliable and accessible data, preferably across platforms which save on duplicated effort at farm level. Independent verification is also required for objective reporting. Red Tractor works, as it reaches across a wide farming base with independent accreditation. It just needs to improve data management and auditors who can focus on what data uploading will not find.

ABP - are already reporting under Task Force on Climate-related Financial Disclosures (TCFD) and have sufficient data sources without using any farm assurance data sources. Similarly, with European Union Deforestation Regulation (EUDR) or UK Forestry Risks Commodities (UKFRC) reporting, we are not envisioning any requirement for farm assurance data being used. In short, we do not see this as an issue and have other ways and means currently of fulfilling our requirements via other sources. However, having a close understanding and relationship with Bord Bia/Origin Green we are admirers of this activity and would welcome the same within the UK.

British Sugar - Red Tractor is best placed to act as a trusted platform to support compliance with emerging UK mandatory reporting requirements. The "legal baseline" itself is tightening, and schemes like Red Tractor can help ensure that delivery of these enhanced standards is consistent, credible, and fair across the supply chain. Its existing assurance framework could be adapted to provide verified data for environmental and climate obligations under the UK Sustainability Disclosure Requirements (SRS), Net Zero commitments, and the Environment Act, including soil health, water quality, and biodiversity targets such as 30x30. It could also support delivery of Agriculture Act requirements on sustainable land management, as well as underpinning mandatory corporate ESG disclosures under CSRD and SECR for businesses, operating in the UK and EU.

Better data collection and verification would bring benefits at every level - helping farm businesses demonstrate the value of their practices, improve productivity and financial resilience, and access new opportunities, while giving processors and customers the assurance they need for reporting, transparency, and compliance. In this way, improvements in environmental and animal welfare standards are both recognised and supported, on farm and across the wider supply chain.

If these requirements were not delivered through a recognised farm assurance system, such as Red Tractor, the likely impact would be duplication of audits, fragmented data collection, increased reporting

costs, and greater burden on farm businesses. This would risk disengagement at farm level and reduce the efficiency and credibility of supply chain reporting. By embedding enhanced standards into an existing, independent, and trusted scheme, the industry can demonstrate that farm businesses are fairly supported, while also ensuring consistent data, minimising additional cost, and delivering collective progress against environmental and sustainability goals.

Co-op - farm assurance is part of our reporting requirements but does not cover everything. We work closely with our processors to understand our supply chain. We don't see the industry moving away from farm assurance, even if the scope may change.

Arla - aim to fulfil any reasonable requirements that provide our customers (and consumers) with confidence. We already provide detail to some of our customers. This information is generally animal welfare related but can also be antibiotic related. We regularly must complete information requests from customers and in turn their customers. Some of the information requests include information covered by Red Tractor standards, others go further and include quality or sustainability measures. If Red Tractor did not exist, this reporting could increase. What is not in place outside of Red Tractor is earned recognition status with local authorities.

National Farming Unions (NFUs)

What measures have been taken to join up the responses of each of the National Farming Unions when addressing the UKFAR recommendations? Have these measures been effective and, if not, what would be your suggested approach to make them effective?

NFU - Since the publication of the UKFAR, the UK farming unions have maintained our regular "leadership group" meetings to share information and updates and we have continued to share the platform with all assurance schemes at our farm assurance roundtable events. For the NFU, getting an understanding from the other UK farming unions of perception and implementation of farm assurance has been tremendously valuable and has supported the variation by nation highlighted in the UKFAR.

NFU would also like to highlight the amount of thought and development that has gone into shaping work around Recommendation 1.01 which they have viewed as foundational to delivery of many of the other recommendations. This work has been carried out shoulder to shoulder with the other unions and the AHDB along with input from assurance schemes. Building consensus though, is a challenge.

NFU has aimed to involve other organisations in development of Recommendation 1.01 and on environmental standards, "mission creep" and data for example, but have occasionally been met with 'it's not a priority for us' in response. The next version of our 'purpose and scope' paper for Recommendation 1.01 will be completed shortly after our next Farm Assurance Schemes roundtable discussion in September 2025.

NFU Scotland - the main vehicle for collaboration is the FARLRG, which NFUS participates in. This provides a regular opportunity to engage on UKFAR issues and to keep issues moving forward. Capacity to progress actions is a challenge for NFUS, however we remain committed to the group and to progress. As well as this, there is regular dialogue between farming union staff, which further cements collaboration.

UFU - since the publication of the UK, the UK farming unions have maintained regular "leadership group" meetings to share information and updates. We have also continued to share the platform with all assurance schemes at our farm assurance roundtable events. Getting an understanding from the other UK farming unions of their perception and implementation of farm assurance has been tremendously valuable and has supported the variation by nation highlighted in the UKFAR. We continue to work shoulder to shoulder on the foundational recommendations.

NFU Cymru now attends a briefing session with the Chief Executive of Red Tractor, alongside the other UK farming unions, following the main Red Tractor board which has provided a further opportunity for joint working. This briefing session and 'leadership group' meetings are in addition to our regular UK farm unions meetings which take place at every level, from the Presidential team through to policy advisers on subject or commodity specific issues. In many of these meetings, farm assurance and coordination of work around the UKFAR is on the agenda.

What steps have you taken to engage with your respective government departments and regulatory agencies to address any overlaps in the farm assurance audit and regulatory inspection requirements?

NFU - we have met with FSA, EA and Trading Standards, but a core DEFRA group has been more elusive. It has been clear, especially post spending review, that this is a low priority for DEFRA with feedback that each regulatory area is quite unique. This links heavily to how earned recognition is understood and recognised by all parties.

Other NFU activities

The UKFAR and its recommendations have become embedded in day-to-day work. While much of this has been strategic (e.g. 'purpose and scope'), there have been some specific areas where a 'one size fits all' is less appropriate and this is exemplified by the need for our sector/commodity boards to take a bespoke approach based on their individual needs and demands.

Boards have made farm assurance a priority work area (for example the NFU Livestock Board sets its priorities for the next two years) and depending on sector need, have begun new workstreams relating to the UKFAR.

The horticulture board have had a particular focus on consistency of assurance and retailer "mission creep", particularly in relation to SEDEX, while the combinable crops board have been most active in this sphere, not least because they are the only sector to have a UKFAR recommendation that picks out the need for reform. Part of the combinable crop's activity has included a bespoke blog/update piece from the board chair, a crops specific response.

Although not specifically relevant to this question, we should also highlight that **NFU Cymru** has been active in trying to ensure better representation for Welsh farmers and wider recognition of differences in devolved policy areas. This in turn should help address any inadvertent overlaps which may come about because of a lack of understanding of devolved policy.

We have started regular quarterly catch ups with Red Tractor technical managers to discuss areas of devolved policy. We have also recently been invited to join the Red Tractor Dairy TAC, which is a step forward, as we were previously not involved with this group.

Annex 8: List of Abbreviations

The following abbreviations are used in this document:

AAS - Approved Assurance Schemes

ABP - Anglo Beef Processors

ACTSO - Association of Chief Trading Standards Officers

AGM - Annual General Meeting

AHDB - Agriculture and Horticulture Development Board

AIC - Agricultural Industries Confederation

AIMS - Association of Independent Meat Suppliers

APHA - Animal and Plant Health Agency

BEA - British Egg Association

BEIC - British Eggs Industry Council

BEPA - British Egg Products Association

BFREPA - British Free Range Egg Producers Association

BFU - British Farming Union

BPS - Basic Payment Scheme

BRC - British Retail Consortium

CAP - Common Agricultural Policy (of the EU)

CB - Certification Body

CPD - Continuing Professional Development

CSRD - Corporate Sustainability Reporting Directive (of the EU)

DAERA - Department of Agriculture, Environment and Rural Affairs of Northern Ireland

DEFRA - Department for Environment, Food & Rural Affairs

DSA - Data Sharing Agreement

EA - Environment Agency

EU - European Union

ERPG - Earned Recognition Policy Group

ESG - Environmental, Social and Governance

FAR - Farm Assurance Review

FARLG - Farm Assurance Leadership Review Group

FAWL - Farm Assured Welsh Livestock

FCN - Farming Community Network

FCP - Farming and Countryside Programme

FDE - Farm Data Exchange

FIA - Food Integrity Assurance

FSA - Food Standards Agency

FFS - Food Standards Scotland

FUW - Farmers Union of Wales

GAFTA - Grain and Feed Trade Association

GHG - Green House Gas

GLOBAL GAP - Global Good Agricultural Practices

HCC - Hybu Cig Cymru/Meat Promotion Wales

IGD - Institute of Grocery Distribution

ISO - International Standards Organisation

KPI - Key Performance Indicator

LA - Local Authority

LANTRA - Land & Training

LCA - Life Cycle Analysis

LEAF - Linking Environment and Farming

LMCNI - Livestock and Meat Commission of Northern Ireland

M&S - Marks & Spencer

MoU - Memorandum of Understanding

N/A - Not Applicable

NAP - National Agriculture Panel of the FSA

NAP - Nutrients Action Programme (of DAERA)

NEMAL - National Egg Marketing Association

NFCU - National Food Crime Unit

NFU - National Farmers Union

NFUS - National Farmers Union, Scotland

NFU Cymru - National Farmers Union, Wales

NGO - Non-Governmental Organisation

NIFCC - Northern Ireland Food Chain Certification

NIBLFQAS - Northern Ireland Beef & Lamb Farm Quality Assurance Scheme

NDPB - Non-Departmental Public Body

NI - Northern Ireland

NRW - Natural Resources Wales

NSF - National Sanitation Foundation

NTS - National Trading Standards

OF&G - Organic Farmers and Growers

OCVO - Office of the Chief Veterinary Officer

PRA - Pullet Rearers Association

QMS - Quality Meat Scotland

RABI - Royal Agricultural Benevolent Institution

RED -Renewable Energy Directive

RSABI - Royal Scottish Agricultural Benevolent Institution

RSPCA - Royal Society for the Prevention of Cruelty to Animals.

RT - Red Tractor

SA - Soil Association

SAI - Sustainable Agriculture Innovative (Platform)

SAOS - Scottish Agricultural Organisation Society

SAP - Sustainable Agriculture Programme (of DAERA)

SECR - Streamlined Energy and Carbon Reporting

SEDEX - Supplier Ethical Data Exchange

SFI - Sustainable Farming Incentive

SFS - Sustainable Farming Scheme

SMETA - SEDEX Members Ethical Trade Audi

SQC - Scottish Quality Crops

SQCF - Scottish Credit and Qualifications Framework.

SRUC - Scotland's Rural College

STAG - Standards Technical Advisory Group

TAC - Trade and Agriculture Commission

TASCC - Trade Assurance Scheme for Combinable Crops

TCFD - Task Force on Climate-related Financial Disclosures

TIAH - The Institute for Agriculture and Horticulture

TOR - Terms of Reference

VMD - Veterinary Medicines Directorate

UFU - Ulster Farmers Union

UKAS - United Kingdom Accreditation Service

UKFAR - UK Farm Assurance Review

US - United States

WG - Welsh Government

WLBP - Welsh Lamb and Beef Producers Ltd

WRAP - Waste and Resources Action Programme

Annex 9: Acknowledgments

I should like to thank the team from Promar International Ltd, namely John Giles, Lauren Abraham and Lizzie Downes, who provided their services as the Monitoring and Reporting stage secretariat.

I should also like to thank all of the organisations who contributed submissions to the monitoring exercise.

It is recognised that the UKFAR has prompted much discussion and debate about how best to improve the farm assurance system, and your work on helping to implement its recommendations is important and much appreciated.

Dr David Llewellyn UKFAR Monitoring and Reporting Commissioner