REGULATORY APPRAISAL

ANIMALS, WALES

ANIMAL HEALTH

THE ANIMAL BY-PRODUCTS (WALES) REGULATIONS 2006

Background

- Regulation (EC) No. 1774/2002 concerning animal by-products has applied in Member States since 1 May 2003. The aim is to protect public and animal health and maintain consumer confidence in the livestock industry, by ensuring that animal by-products are used, processed or disposed of safely. Enforcing Regulations were introduced in all Member States as a result of this EU Regulation. This was introduced in Wales by The Animal By-Products (Wales) Regulations 2003, which came into force on 31 October 2003.
- 2. The EU Regulation provides for the European Commission to propose suitable transitional measures and amendments to the existing annexes to the Regulation.
- 3. Information on many of the proposals was circulated widely on 9 June 2003 and made available on the Assembly website; <u>www.countryside.wales.gov.uk</u> Discussions with interests have also taken place throughout negotiations on the EU measures.
- 4. The purpose of the EU Regulation is to protect animal and public health. It is based on a number of opinions of the EU Scientific Steering Committee, which addressed the risk to animal and public health from certain uses or disposal methods for animal by-products. These were primarily concerned with the risks from BSE, but also took account of the risks from other pathogens that may potentially be introduced or spread by animal by-products. These include exotic animal pathogens such as foot and mouth disease and classical swine fever (which are not present in Wales but may enter in illegally imported meat) and endemic animal and human pathogens (which are present in Wales) such as Salmonella, E. Coli and botulism.
- 5. The EU Regulation divides animal by-products into three risk categories and specifies the permitted treatment or disposal routes for each category of material and the standards of operation of the permitted outlets. The Regulation also provides for the European Commission to exercise its own competence to amend the Annexes to the Regulation and to introduce transitional measures. If the Commission wishes to do so, it must first consult the relevant scientific body where necessary, and then secure the agreement of a qualified majority of member States to its proposal.

Purpose and Intended effect of the measure

- 6. The intended effect of these Regulations, which apply in relation to Wales, is to revoke and re-make the Animal By-Products Regulations 2003, which made provision in Wales for the administration and enforcement of Regulation (EC) No. 1774/2002 of the European Parliament and of the Council laying down health rules concerning animal by-products not intended for human consumption, (OJ No. L273, 10.10.2002, p1). The EC Regulation will be administered by the State Veterinary Service (SVS) who will carry out site visits and inspections of Animal By-Product proposed sites The Assembly issues approvals or rejections based on recommendations by the SVS.
- 7. In addition, these Regulations repeal those provisions of the Slaughterhouses Act 1974 relating to knackers' yards (premises licensed by the local authorities for receiving dead stock and producing flesh from this for feeding dogs) in so far as they apply in Wales, as knackers' yards are now regulated under these Regulations. They repeal section 6 of the Dogs Act 1906 in so far as it applies in Wales, which related to leaving carcases in such a way that dogs could gain access to them, and replace it with a provision in regulation 11 prohibiting farmed livestock from access to unprocessed animal by-products. They also revoke the Rendering (Fluid Treatment) (Wales) Order 2001 and replace it with Schedule 2 to these Regulations.
- 8. These Regulations clarify and relax the position on the feeding to farmed animals catering waste or feed materials containing or derived from catering waste, which would allow farmers to feed catering waste to their livestock.
- 9. They also permit intra-species recycling for the feeding of fish with processed animal protein derived from the bodies or parts of bodies of fish (other than farmed fish of the same species).
- 10. It is an offence to take any animal by-product to premises where livestock is kept, however, these Regulations allow for the return of hides/skins to the place of origin, provided that there is an assurance by the person in control of the by-products that livestock do not have access to the by-product.
- 11. These Regulations lift previous restrictions on land as they define the use of pasture land that is intended to be used for grazing or cropping for feedingstuffs following the application or deposit of organic fertilisers and soil improvers. This provides greater freedom for landowners.
- 12. The Regulations defines the areas in Wales namely Bardsey and Caldey Islands, that are considered to be remote. In effect, this would allow livestock owners to bury carcasses in these areas. It also sets out the procedure for disposal of animal by products in the event of a disease outbreak situation.
- 13. The Regulation sets out transitional conditions that should be met to allow gelatine to be authorised for the manufacture of photographic products and the collection, transportation, processing, use & storage of milk, milk based products and milk derived products. Amongst other things this allows farmers to feed surplus milk to their livestock under certain conditions. Transitional

measures on the collection, transportation and disposal of former foodstuffs shall cease to have effect on 1 January 2006.

- 14. Operators who do not comply may face prosecution. Prosecutions may result in a fine of up to £5000 and three months' imprisonment for cases heard in a magistrate's court or an unlimited fine and up to two years imprisonment for cases heard in the Crown Court. In addition, in the event of non-compliance, the Regulations provide for the suspension of an operator's approval, thus preventing the premises from receiving animal by-products.
- 15. In Wales enforcement of these Regulations is carried out by the Meat Hygiene Service in Slaughterhouses and by Local Authorities elsewhere. These bodies already undertake this role.

Risk Assessment

16. If this legislation were not introduced in Wales the implication for Welsh farmers would be that they could not, for instance, feed their livestock with surplus foodstuffs thus increasing their costs and putting them at a disadvantage to farmers in other Member States.

Options

17. In respect of this legislation the "Do Nothing" option is not an option as it would lead ultimately to infraction proceedings against the national Assembly for Wales by the European Commission. Therefore, the "Make the Legislation" option, to implement the changes required to comply with European legislation, is being recommended.

Make the Legislation

18. The purpose of this Regulation is to bring into effect clarification and deregulation negotiated with the EU the effect of the changes is primarily deregulatory and remove some requirements, which are now considered to be unnecessary.

Benefits

- 19. The Implementation of the Regulations will benefit farmers as they will be allowed to feed catering waste and surplus livestock (under certain conditions) to their livestock. In addition, they will also be permitted to bury carcasses in areas considered as remote (i.e. Bardsey and Caldey Islands).
- 20. Producers of hides and skins will be permitted to return them to place of origin, thus removing the need for the involvement of third parties, who currently carry out the role of processing hides and skins.

Costs

- 21. There are no financial implications for the Assembly as a result of the making of the proposed Regulations they are primarily deregulatory.
- 22. There would be costs savings to farmers as they would be able to feed catering waste and surplus foodstuffs to their livestock instead of buying in processed feed for livestock. These savings cannot be quantified as it would

vary from farm to farm. There would also be cost savings in relation to the production of hides and skins as livestock farmers would not need to pay a third party to process hides and skins. However, this figure will be difficult to quantify as it would depend on the different processes for treating hides and skins in different plants.

23. In addition there would be costs savings to farmers in either Bardsey or Caldey Islands as they will be permitted to bury their livestock on those islands. Previously, removal of the livestock would mean that farmers were required to charter a boat, with lifting equipment to take the carcasses to the mainland and have them disposed of at an approved disposal plant.

Business sectors affected

24. In the UK, the measures could have an impact on some pig farmers, 25,000 dairy farmers, plus 200 medium or large processors of milk, many hundreds of small processors of their own milk, producers of dairy products and the animal feed industry. Other producers of animal by-products such as 8,300 food manufacturing premises, and 35,000 retail outlets may be affected if they send surplus foodstuffs containing products of animal origin for feeding to livestock. There may also be an impact on the waste disposal industry if there is a need to secure alternative outlets for this material.

Issues of equity and fairness

25. Under section 106 of the Government of Wales Act 1998, a Community obligation of the United Kingdom to implement EU legislation is also an obligation of the Assembly. The Commission's Food and Veterinary Office has begun a programme of inspections to assess the application of the controls in all member States.

Consultation

With Stakeholders

26. A UK wide consultation on the proposed changes to the Animal By-Products Regulations 2003 was undertaken by the Department for the Environment, Food and Rural Affairs (Defra) between 23 July 2004 and 15 October 2004. There was broad support for the changes. A list of consultees is attached at Annex A and the consultation documents can be found at: www.defraweb.defra.gsi.gov.uk/corporate/consult/animalbyprod2/index.htm.

27. As the effect of the changes are primarily deregulatory the Minister for Environment, Planning and Countryside agreed that there was no need for a separate consultation in Wales. However, Stakeholders were informed of the proposed changes to legislation by a letter of information, which was sent out on 14 November 2005. A list of the recipients is attached at Annex B.

With Subject Committee

28. These Regulations have been notified to the Environment, Planning and Countryside Committee, via the list of forthcoming legislation on 2 February 2005 (EPC(2)- 02-05 (p.3) Part 2, the item was not numbered) and has remained on the list ever since. However, the title of the legislation was stated

as the Animal By-Products (Wales) (Amendment) Regulations 2005. The Regulations were not identified for detailed scrutiny.

Consultation with small businesses: the Small Firms' Impact Test

29. Some of these affected by the measures are small businesses, primarily those farmers who feed their livestock on this material. The relevant industry organisations and some businesses in Wales have been consulted throughout negotiations on the EU measures.

Enforcement and sanctions, monitoring and review

- 30 Approvals under these Regulations are issued by the National Assembly for Wales. Inspections are carried out by the State Veterinary Service and enforcement is carried out by the Meat Hygiene Service in slaughterhouses and by local authorities elsewhere. These bodies already undertake this role.
- 31. The Welsh Assembly Government is keen to avoid the introduction of requirements for operators who process or feed milk or biscuit etc waste to be subject to approval or registration. Such a requirement would have significant resource implications for the Welsh Assembly Government as well as for those operations, which required approval or registration.

Sanctions under Animal By-Products (Wales) Regulations 2006 (which apply Regulation (EC) No 1774/2002)

- 32. Operators who do not comply may face prosecution. Prosecutions may result in a fine of up to £5000 and three months' imprisonment for cases heard in a magistrate's court or an unlimited fine and up to two years imprisonment for cases heard in the Crown Court. In addition, in the event of non-compliance, the Regulations provide for the suspension of an operator's approval, thus preventing the premises from receiving animal by-products.
- 33. Discussions on the measures continue at EU and national level on the controls on animal by-products.

Summary

34. These Regulations are being implemented because they seek to achieve a solution, which provides certainty about the controls that apply to the feeding of the relevant material and applies them in a proportionate manner.

Annex A – List of Consultees to 2004 Consultation

A T Animal Products Abbott Analytical ABHI ABM ADAS Gleadthorpe ADAS Lyme Building AFRC Institute of Food Research (IFR) Agricultural & Food Research Council Agricultural Training Board Air Spectrum Environmental Ltd Alpheco Limited Alver Veterinary Group Amber Valley Borough Council Anglo European Livestock Animal Health City of Bradford MDC Animal Health Trust Animal Health, North Yorkshire Anitox Limited Anwick Laboratory ASDA Ashford Borough Council Association of British Abattoir Operators Association of Circus Proprietors in Great Britain Association of Independent Meat Supplies Association of London Authorities Association of Meat Inspectors (GB) Ltd Association of Private Pet Cemeteries and Crematoria Axiom Veterinary Laboratories Axis, Chester Enterprise Centre Barmsley Borough Council Barrette's Mill **Beeford** Laboratories Bernard Matthews Foods Ltd Biffa Waste Services Limited **Big Food Group Plc Birmingham City Council Markets** Bishop Burton College of Agriculture **Blue Print Mushrooms** Board of Deputies of British Jews **BOCM** Pauls Limited **Bolton Emery Partnership** BPC **Brightstar Environmental** Bristol University (Animal Service) British Association of Canned & Preserved Food Importers & Distributors British Association of Food British BioGen British Cattle Veterinary Association

British Coloured Sheep Breeders Association British Eggs Industry Council British Free Range Egg Producers' Association British Frozen Food Federation British Hospitality Association British Independent Grocers Association British Institute of Innkeeping British Institute of Regulatory Affairs British Leather Confederation **British Meat Federation** British Meat Manufacturers Association British Milksheep Association British Multiple Retailer Association **British Organic Farmers** British Overseas Trade Board **British Pig Association British Ports Association British Poultry Council** British Retail Consortium **British Sandwich Association British Trout Association British United Turkeys** British Veterinary Poultry Association **Broadland District Council Bromley Reference Library** Buckinghamshire Health Authority **Business Environment Association** Butler Kelly Ltd Butterworths Law of Food and Drugs **Cambridge Recycling Services** Camden Food and Drink Research Association CAMR Caterers Association of Great Britain Catering Industries Liaison Council Catering Waste and Animal Feed Central Laboratory Central Science Laboratory Chartered Institute of Environmental Health CHC Waste Management Chilled Food Association City of London Central Markets Authority CLC CO - Operative Union Ltd Cobb Breeing Company Limited College of the Distributive Trade **Combustion Engineering Association** Community Composting Network **Composting Association Consumer Association**

Cookery and Food Association Co-operative Wholesale Country Landowners' Association County Councils Association County Mulch Ltd Croda Colloids Ltd Croda Universal Ltd Crowshall Veterinary Services

DAFO 318 Technical Index's Danish Bacon & Meat Council **Deer Initiative** Department of Agriculture & Food, Dublin Department of Agriculture Economics and Food Marketing Department of Economy & Environment, Cleveland Department of Environmental Social Sciences Department of Local Government & Environment Department of Trading Standards Dept. of Food Commodities Devan Laboratories Limited Devro plc Diary Industry Association Ltd **Diary Industry Federation Ltd Division of Food Animal Services** DNV Don Whitley Science Limited Dundas Bros Ltd Durham County Waste Management Company Ltd Earthkind Eastwood Central Laboratory **Eclipse Scientific** ECOM Technology Limited Ellendale Engineering **English Nature Environment Agency Environment Agency Wales Environment Resources Management** Environment, Health and Consumer Services Environmental Friendly Systems 2000 Ltd **Environmental Health Services** Environmental Health Services Cannock Chase Council Environmental Products & Services Limited **Environmental Service Association Environmental Services Directorate** Environmental Services West Wiltshire District Council Environmental Services, Devon Envirowaste Euro Biodiesel Euro Environmental Containers Supports European Oleochemicals & Allied Products Group

European Public Policy Advisers European Trade Group Evans Universal Ltd Evesham Food

Faccenda Chicken Limited FACE Farm & Food Society Farm Animal Welfare Co - Ordinating Farm Livestock (Welfare) Advisory Group Farmatic Farmers' Weekly Federation of Bakers Federation of Food & Drink Manufacturers Federation of Fresh Meat Wholesalers Federation of Wholesale Distributors Feed Fat Association Feering International Fenland Sheepskin Co. Ltd Fertiliser Manufacturers Association Fish & Meat Spreadable Products Association Food and Drink British Retail Consortium Food and Drink Industry and Council Food and Drinks Federation Food and Health Research Food from Britain Food Manufacturers Federation Food Standards Agency Food Technology Centre Freehold Community Association

Gary Odlin Premier Poultry Global Environment Ltd Gloucester Laboratories (Vet) Limited Graham Bolton Planning Grain & Feed Trade Association Gray's Waste Services Ltd Graystone Abattoir Greendale Veterinary Laboratories Limited Guest Farm

Halal Food Authority Hartlepool Borough Council Heinz Kendal Holsworthy Biogas Ltd Hoofmark Organic Limited Horncastle Laboratories Horticultural Research International Hospital Caterers Association Hotel and Catering Training House of Common Library Housing and Environment Services Human BSE Foundation Humberside Wastewise Waste Management

Imported Meat Trade Association Independent Food Retailers Independent Organic Tanner Information Bureau AEA Technology Institute for Animal Health (IAH) Institute of Environmental Health Officers Institute of Fisheries Management Institute of Food Science & Technology (UK) Institute of Grocery Distributors Institute of Waste Management C/O Norfolk Environmental Waste Services Ltd Interfish Limited International Laboratory Services Limited International Meat Trade Association Intervention Board Executive Agency

J Sainsbury PLC Joint Nature Conservation Committee

K J Engineering Kent County Council Kerry Ingredients Kirklees Council

Leatherhead Food Research Association Leeds Veterinary Laboratories Leicester City Library Licensed Animal Slaughterers' & Salvage Association Livestock Auctioneers' Association Livestock Auctioneers Market Committee for England and Wales Livestock Marketing Commission NI Livestock Trades Association of Great Britain Ltd Lloyd Maunder Limited Local Authority Catering Association Local Authority Co-ordinating Body On Trading Standards (LACOR) Local Authority Recycling Advisory Committee Local Government Association London Borough of Bromley

M & D I Kemp & Sons Marks and Spencer Plc Marshall Farmer Ltd Martin Cook Associates Master of Draghounds Association Master of Foxhounds' Association McKey Food Service Ltd Meat and Livestock Auctioneers' Association

Meat and Livestock Commission Meat Industry Liaison Group Meat Trade Journal Meat Training Council Microbiological Consultants Services Microbiology Cerestar (UK) Limited Microbiology Laboratories Microcheck Technical Services Micro-Search Laboratories Limited Microspec Laboratories Limited Milbury Systems Ltd Mobile & Outside Caterers Association Nanteague Farm National & Local Government Association National Animal Health & Welfare Panel National Association of Catering National Association of Catering Butchers National Association of Market Bakers National Association of Pharmaceutical National Birds of Prey Centre National Consumer Council National Consumers Protection Council National Council of Women of Great Britain National Farmers Union National Federation of Anglers National Federation of City Farms National Federation of Consumer Group National Federation of Fish Fryers National Federation of Meat and Food Traders National Federation of Meat Traders National Federation of Wholesale Grocers National Federation of Wholesale Poultry National Federation of Women's Institutes National Federation of Zoological Gardens of Britain & Ireland National Joint Council for Local Authorities National Office of Animal Health National Pharmaceutical Association National Pig Association National Pig Breeders Association National Renderers Association National Sheep Association National Trust Norfolk Environmental Waste Services Limited North Dorset District Council North Lincolnshire Council North Warwickshire Borough Council North Western Laboratories Limited Northern Counties Animal Health & Welfare Group Northern Hygiene Laboratories

Nutretch Ltd

Open University Organic Resource Agency Ornamental Aquatic Trade Association

Petfood Manufacturers' Association PHLS Communicable Diseases Centre Pig Disease Information Centre Ltd Pig Veterinary Society Piper Farm Pizza & Pasta Association Plymouth City Council Port of London Health Authority Poultry Health Services Limited Poultry World Precision Analysis (North West) Limited Premier Fresh Foods Limited **Proper Job Limited** Prosper De Mulder Public Health (Commercial) Department Public Health Laboratory Services (PHLS)

Q Laboratories Limited Quality Meat & Livestock Alliance

Rare Breeds Survival Trust Reading Scientific Services Limited Real Sheepskin Association Reference & Information Library **Regulated Incinerator Operators RES** Agriparts Ltd **Restaurant Association Retford Poultry Partnership RHM** Technology Rochdale MBC Royal College of Veterinary Surgeons Royal Society of the Commonwealth & Royal Association of British Dairy Farmers Royal Veterinary College **Rural Services Network** Rural Society of Health

Safeway Salamon & Seaber Limited Salmon and Trout Association Sandwell Information Service Scientific Services Sci-Tech Laboratories Scotch Premier Meat Ltd Scottish Environmental Protection Agency Seed Crushers and Oil Processors Association / National Edible Oil Distributors Shank Chemical Services Division Shellfish Association of Great Britain Silliker Limited, Essex Sim Engineering Ltd Slate Hall Veterinary Practice Small Abattoir Federation (SAFE) Smithfield Market Tenants Association Smithfield Superintendents Office Society of Public Health Ltd Soil Association Somerfield South Ayrshire Council South East Institute of Public Health South Gloucestershire Council Staffordshire County Council Sun Valley Foods Ltd Sun Valley Poultry Limited Sustainable Biowaste Solutions Swanson House Farm

Tag Environmental Limited TESCO Stores Ltd Thornton Dean Environmental Health Trade Union Congress Trading Standards Department Trading Standards Institute Travena Trouw (UK) Limited

UK Agricultural Supply Trade Association UK Association of Fishmeal Manufacturers UK Association of Frozen Food Producers UK Egg Producers' Association UK Renderers' Association **UK Retailers Association** UK Waste Management UK Ltd **UKEP** Union of Muslim Organisations Unigema UNISON (Trade Union) University Federation for Animal Welfare University of Bristol University of Hull University of Leeds University of Liverpool University of Newcastle University of Southampton

VAL Preston

Veterinary Laboratories Agency Veterinary Public Health Association Waitrose Limited Ward Enterprises (Uttoxeter Ltd) Warrington Borough Council Waste Food Feeders Association Waste Link UK Ltd Waste Management Agency Waste Management and Technical Engineering Department Waste Spectrum Environmental Ltd Waste Strategy Division (DEFRA) WCTS Weald Laboratories Limited Wealden District Council West Dorset District Council West Lancashire District Council Western Group, Environmental Health Committee Wickham Laboratories Limited William and Rigby Sons William Forest Son (Paisley) Ltd William White Fabrications Ltd Wincanton Laboratory Limited Women's Farming Union Women's National Commission Worshipful Company of Butchers WRc-NSF Ltd Wright Environmental Management (UK) Ltd Wye Borough Council Wye College (University of London)

Zoological Society of Great Britain

Annex B - Stakeholder List

ADAS

Brecon Beacons National Park British Veterinary Association (N) British Veterinary Association (S) Celtic Pride Country Landowners Association Countryside Council for Wales Cymru Breeding Services Environment Agency Farmers Union of Wales Federation of small Businesses Food Standards Agency Guild of Welsh Lamb & Beef Hybu Cig Cymru Institute of Rural Health MLC – Wales Nation Sheep Association Wales National Beef Association Wales National Farmers Union Cymru / Wales National Trust NFU-Cymru/Wales Organic Farming Centre Wales Pembrokeshire Coast National Parks Red Meat Strategy Group Royal Welsh Agricultural Society RSPCA Snowdonia National Park Veterinary Laboratories Agency Wales Wales & Marches Goat Society Wales Council for Voluntary Action WDA Welsh Lamb & Beef Suppliers Welsh Livestock Auctioneers Association WLGA / LACORS Wool Producers of Wales

ABP applicants

Aber Valley Fox Hounds Abernant Hunt Amman Valley Hunt B Watkins & Son Banwaen Fox Shoot Banwen Miners Hunt Biffa Waste Services Biozyme Laboratories Ltd Bitfael Valley Hunt Black Bag Energy Ltd Black Mt Red Kite Feeding Station Brecon Hunt Kennels British Quality Pigs Caerphilly & District Farm Hunt **Cambrian Pet Foods Capeston Organic Poultry** Carmarthen & District Farmers Hunt Carmarthen County Council Carmarthenshire Hunt Cheshire Beagle Hunt Chetwynd Animal By Products **Clutton Agriculture** Clyttir Farm Ltd Coed Y Glyn Fox Hounds Colwyn Bay Zoo Conwy Valley Fox Hounds Corbett Farms Ltd Cranberry Foods Ltd, Dingestow Cranberry Foods Ltd, Gobion Cranberry Foods, Broadaxe Cranberry Foods, Crossgates Cranberry Foods, Llanafan Cranberry Foods, Notron Cross Inn Honds Curre Foxhounds Hunt Kennel Cwmni Gwastraff Mon-Arfon Cwn Hela Eryri Cwn Hela Glyndwr Cwn Hela Hiraethog Cwn Hela Maescoch Cwrt Y Cadno Hunt **D** B Roberts D Coventry D Thomas **DAR** Jones David Davies Hunt Kennels David Gethin **Deans Food** DJJ Watkins & Co DL Organ **Dragon Seabaits** Dwyfor Hunt Dysynni Valley Fox Hounds EP and LM Powell Euro/DPC F Horman & Co F M Caine & sons Factory Yard Ltd Flint & Denbigh Hunt Kennels G & J James & Sons G Vaughan & Co Geidd Hunt Kennels Gelligaer Farmers Hunt Glamorgan Hunt

Glyncelyn Beagles Graig Cefn Park Fox Destuction Grampian Country Chickens Rearing Ltd Gwendraeth Valley Hunt HL&EFWilliams H M Jones **H P Evans** Harford Fox Hounds **HLC Waste Management Services** Hollander Hyams Ltd International Technology Traders Ltd Iolo Owen IR & SM Rattray Irfon and Tywi Hunt Ithon Valley Hunt J Elwyn Evans J Watkins & Son J Williams-Wynne & Son Jamesmor Kennels Jim Douglas & Sons Lafarage Cement UK Lamby Way Landfill Site Llanarmon Fox Hounds Llangeinor Hunt Kennels Llanwnen Fox Hounds Lleyn and eifionydd Hunt M A Pipkin M Davies & Co M&S Livestock Feeds M/S A R Edwards & Son M/S T Goddard & Sons Melin y Glyn Hunt Micropharm Ltd Mid Wales & Glam Mink Hound Monmouthshire Fox Hounds Morph Solutions Mountain Hare Knackers Yard Nantcol Valley Fox Hounds Neal Environmental Newport County Council Owen G Owen Ltd P B Gelatins UK Ltd P Jones **P** Roberts Pant Y Waun Foxhounds PCM and NM Pugh Pembrokeshire County Council Pembrokeshire Hunt Pencefn Livestock Ltd Penlanau Valley Fox Destruction Society Penrhiwfer Fox Hounds Pentyrch Hunt Kennels Phillip Murrell Protein Product Ltd Pwllcarn Hunt Kennels Pwllwatkin Waste Site R Bevan R G & M & R G Parry R M Eckley Recyclo Ltd Rhydcwmerau Hunt Roger Ellis Trading Ltd RSR Ltd S Hav S W Brace & R S Parker School of Biological & earth Sciences Sennybridge Farmers Hunt SG Davies & Sons Sir Watkin Williams Wynn Hunt South Pembs Hunt Summerleaze Pet Crematorium Sun Valley Foods Ltd T B and F M Vesey **Tanatside Hunt Kennels** Teifiside Hunt Teme Valley Hunt Tesco Store Ltd The Animalarium The Incinerator Doctor The Pembrokeshire Meat Co Ltd The Pet Cemetery Tregynon & Cefn Coch Hunt Vale of Clettwr Hunt Vet Teaching Hospital Veterinary Investigation Centre Vital Earth Group Volac International Ltd W A James W Bedell W J George Butchers Ltd W P Evans WJN Collard Wool Producers of Wales, Brecon Wool producers of Wales, Denbigh Wool Producers of Wales, Newton Wool Producers of Wales, Porthmadog Wormtech Ltd Ystrad Hunt Kennels