



Llywodraeth Cymru Ymgynghoriad – Crynodeb o Ymatebion

Cod Ymarfer er Lles Moch

Gorffennaf 2020

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

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Crynodeb Gweithredol

- Cafodd deuddeg wythnos yr ymgynghoriad cyhoeddus ar y Cod Ymarfer newydd er Lles Moch (y 'Cod') ei lansio ar 2 Mawrth 2020. Cyhoeddwyd yr ymgynghoriad ar wefan Llywodraeth Cymru.
- Roedd yr ymgynghoriad yn gyfle i'r diwydiant, asiantaethau gorfodi, grwpiau buddiant a'r cyhoedd ymateb i'r Cod newydd.
- Gofynnwyd i'r ymatebwyr ystyried arddull, diwyg a chynnwys y Cod, ac unrhyw effaith ar yr Iaith Gymraeg.
- Cafwyd pum ymateb i'r ymgynghoriad.
- Roedd croeso i ymatebwyr gynnig eu sylw ar unrhyw ran o'r Cod. Cafwyd argymhellion ar wella arddull a chynnwys y Cod, gan gynnwys yr wybodaeth, y cyngor a'r arweiniad ynddo.

1. Yr ymgynghoriad

1.1 Gwybodaeth Gefndir

Mae'r Cod hwn yn berthnasol i Gymru yn unig. Mae'n cymryd lle'r Cod Argymhellion er Lles Da Byw: Moch, a gyhoeddwyd yn 2004).¹ Mae'r Cod yn ymdrin â phob mochyn fferm, p'un a ydyn nhw'n cael eu cadw i fridio, i'w magu a/neu i'w pesgi, p'un a ydyn nhw'n o deip "gwyllt" neu faeddod gwyllt sy'n cael eu cadw ar fferm (neu arddangosfa / parc fferm), a ph'un a ydyn nhw'n cael eu cadw bob yn un neu'n nifer gyda'i gilydd. Bydd y Cod yn helpu perchenogion/ceidwaid moch i gydymffurfio â deddfwriaeth lles anifeiliaid, ond ni ddylid ei ddefnyddio yn lle cyngor gan filfeddyg neu gynghorydd technegol arbenigol. Hefyd, er bod llawer o ddarpariaethau'r Cod yn ymwneud yn benodol ag amgylchedd y fferm, gallai'r darpariaethau eraill fod yn werthfawr ac yn berthnasol i unrhyw un sy'n cadw moch, gan gynnwys moch "anwes".

Mae Rheoliadau Lles Anifeiliaid a Ffermir (Cymru) 2007 yn pennu'r amodau ar gyfer cadw pob anifail fferm, gan gynnwys moch (Atodlen 1), a rhaid cadw atyn nhw. Pennir hefyd amodau ychwanegol sy'n ymwneud yn benodol â chadw moch (Atodlen 8). Mae rhai o'r gofynion cyfreithiol penodol yn cael eu hailadrodd yn y blychau yn y Cod hwn. Mae Cyngor Ewrop wedi gwneud argymhellion ynghylch moch fferm hefyd. Os nad ydyn nhw eisoes wedi'u hymgorffori mewn deddfwriaeth, rydym wedi'u nodi yn y Cod.

Hefyd, mae amodau ynghylch cofrestru moch yr Hen Fyd (teulu Suidae) fel baeddod gwyllt a moch dafadennog o dan Ddeddf Anifeiliaid Gwyllt Peryglus 1976 a allai fod yn berthnasol. Gallai deddfwriaeth arall (er enghraifft, eu lles adeg eu lladd, eu lles wrth eu cludo neu dagio anifeiliaid) fod yn berthnasol i les moch. Dylid mynd hefyd ar ofyn arbenigwyr, fel milfeddygon neu gynghorwyr technegol arbenigol, am gyngor. Gweler Atodiad 1.

Mae'r deddfwriaeth lles anifeiliaid berthnasol yn gymwys i berchenogion yn ogystal ag i unrhyw un sy'n gyfrifol am fochyn, boed ar y fferm, wrth ei gludo (gan gynnwys llwytho a dadlwytho) ac yn y lladd-dy. Mae hynny'n cynnwys pobl sy'n gyfrifol am ofal y mochyn am gyfnod byr, gan gynnwys milfeddyg. Er mwyn gwneud yn siŵr fod pawb dan sylw yn glir ynghylch ei gyfrifoldebau o ran lles anifail, gallai contract ysgrifenedig ar gyfer staff parhaol a thrydydd partïon sydd wedi'u contractio i wneud swyddogaethau penodol, fel lladd ar y fferm, fod yn ddefnyddiol. Er hynny, bydd y rhwymedigaethau sy'n cael eu gosod o dan y gyfraith yn dal yn gymwys, p'un a oes contract neu beidio.

Gall agweddau penodol ar hwsmona da byw olygu peryglon i iechyd a diogelwch ceidwad y stoc. Ceir cyngor ar faterion o'r fath gan Arolygydd Diogelwch Amaethyddol y Weithrediaeth Iechyd a Diogelwch.

Mae moch yn anifeiliaid chwilfrydig a chymdeithasol sy'n addasu'n rhwydd i amodau newydd, ond mae'n dal yn bwysig cadw golwg ofalus arnyn nhw wrth newid eu hamodau ar adegau gwahanol o'u bywyd. Gellir cadw moch o dan amrywiaeth o amodau magu, o'r awyr agored i unedau dan-do. Mae ceisio gofalu am les mochyn o dan yr amodau gwahanol hyn yn herio'r perchennog/ceidwad mewn ffyrdd gwahanol.

Dylai moch gael eu trafod mewn ffordd briodol a phositif o'u dyddiau cynharaf. Dylen nhw ymateb â chwilfrydedd i bobl, gan gynnwys y rheini nad ydyn nhw'n gyfarwydd â nhw. Ond

¹ Code of Recommendations for the Welfare of Livestock: Pigs (2004):
https://gov.wales/sites/default/files/publications/2017-11/pig-welfare-code-of-practice_0.pdf

dylen nhw ddim cael eu defnyddio i greu sioe neu wrthdystiad cyhoeddus os byddai hynny'n debygol o niweidio eu lles, gan gynnwys eu hiechyd. Yn ogystal â thrwyddedau symud, mae yna ofynion trwyddedu eraill wrth arddangos anifeiliaid i'r cyhoedd am resymau addysgol neu at ddiben diddanu fel rhan o fusnes.

Mae'n bwysig ystyried lles yr anifail cyn gosod unrhyw gyfarpar newydd. Rhaid i'r system hwsmona a ddefnyddir a maint y genfaint fod yn briodol i'r math o fochyn a ddewisir ac i unrhyw gyfyngiadau amgylcheddol ar y tir, gan gynnwys maint y fferm. Bydd yr amser sydd gan y staff a'u sgiliau a'u cymwyseddau i reoli'r system dan sylw hefyd yn dylanwadu ar hyn. Dylai dyluniad adeilad neu offer newydd neu newidiadau amgylcheddol neu reoli eraill bob amser anelu at gynnal neu wella lles y moch.

1.2 Ymgynghoriad Cyhoeddus

Cafodd deuddeg wythnos yr ymgynghoriad cyhoeddus ar y Cod ei lansio ar 2 Mawrth 2020². Cyhoeddwyd yr ymgynghoriad ar wefan Llywodraeth Cymru ac roedd ar gael mewn fformatau gwahanol o ofyn amdanynt.

Roedd yr ymgynghoriad yn gyfle i'r diwydiant, asiantaethau gorfodi, grwpiau buddiant a'r cyhoedd ymateb i'r Cod newydd.

Bwriad y Cod yw annog pawb sy'n gyfrifol am foch i godi'u safonau hwsmonaeth. Mae'n esbonio beth sydd ei angen i berson ei wneud i fodloni'r safonau gofal y mae'r gyfraith yn gofyn amdanynt. Yn ei hanfod, os ydych yn gyfrifol am anifail, mae dyletswydd gyfreithiol arnoch i gymryd camau rhesymol i ddiwallu anghenion lles yr anifail hwnnw. Rydym yn ddiolchgar i gynrychiolwyr y diwydiant am ein helpu i baratoi'r Cod.

1.3 Cwestiynau'r Ymgynghoriad

Gofynnwyd i'r ymatebwyr ystyried pedwar cwestiwn:

1. Cwestiwn 1:

Mae'r ymgynghoriad hwn yn holi barn ynghylch arddull, cynllun a chynnwys y cod a'r wybodaeth, y cyngor a'r canllawiau y mae yn ei gynnwys. Mae'n bwysig eich bod yn rhoi cymaint o wybodaeth a thystiolaeth â phosibl i gefnogi eich barn. Bydd hyn yn helpu inni sicrhau cywirdeb ac ansawdd y Cod. Mae croeso i sylwadau ar unrhyw ran o'r Cod.

2. Cwestiwn 2:

Hoffem wybod eich barn ar yr effeithiau y byddai'r Cod Ymarfer ar gyfer Lles Moch yn eu cael ar yr iaith Gymraeg, yn benodol ar gyfleoedd i bobl ddefnyddio'r Gymraeg, a peidio â thrin y Gymraeg yn llai ffafriol na'r Saesneg. Pa effeithiau rydych chi'n credu y byddai? Sut y gellid gynyddu effeithiau positif a lliniaru effeithiau negyddol?

3. Cwestiwn 3:

Eglurwch hefyd os gwelwch yn dda sut rydych chi'n credu y gall y polisi arfaethedig Cod Ymarfer ar gyfer Lles Moch gael ei lunio neu ei addasu er mwyn cael effeithiau positif ar gyfleoedd i ddefnyddio'r Gymraeg ac ar beidio â thrin y Gymraeg yn llai

² Llywodraeth Cymru, Ymgynghoriad ar God Ymarfer ar gyfer Lles Moch (2020): <https://llyw.cymru/cod-ymarfer-lles-moch>

ffafriol na'r Saesneg; a pheidio â chael effeithiau andwyol ar gyfleoedd i ddefnyddio'r Gymraeg ac ar beidio â thrin y Gymraeg yn llai ffafriol na'r Saesneg.

4. Cwestiwn 4:

Rydym wedi gofyn nifer o gwestiynau penodol. Os oes gennych unrhyw faterion cysylltiedig nad ydyn ni wedi mynd i'r afael â nhw, defnyddiwch y lle hwn i wneud hynny:

2. Ymatebion i'r Ymgynghoriad

Daeth pum ymateb i'r Ymgynghoriad i law. Cafwyd tri dros yr e-bost a dau ar yr holiadur ar-lein. Rhestrir y mudiadau a ymatebodd yn Atodiad A.

Ni wnaeth pob ymatebydd ateb pob cwestiwn. Gyda'r rheini, ac at ddiben y ddogfen hon, mae'r ymatebion wedi'u neilltuo i'r cwestiynau y maen nhw'n cyfateb orau iddyn nhw. Hefyd, lle cafwyd atebion i gwestiynau penodol, mae'n bosibl ein bod wedi neilltuo rhannau o'r ateb hwnnw i gwestiwn arall y mae'n cyfateb yn well iddo.

2.1 Cwestiwn 1: Mae'r ymgynghoriad hwn yn holi barn ynghylch arddull, cynllun a chynnwys y cod a'r wybodaeth, y cyngor a'r canllawiau y mae yn ei gynnwys. Mae'n bwysig eich bod yn rhoi cymaint o wybodaeth a thystiolaeth â phosibl i gefnogi eich barn. Bydd hyn yn helpu inni sicrhau cywirdeb ac ansawdd Y Cod. Mae croeso i sylwadau ar unrhyw ran o'r Cod.

Adran 1 – Argymhellion sy'n berthnasol i bob mochyn

Llwytho, dadlwytho a chludo

- *'To strengthen this section of the document, we strongly recommend that the code should require that all third parties and owner/keepers responsible for the transport of pigs are familiar with the Humane Slaughter Association's guidance on the [Transport of Livestock](#) and our position on the [welfare of livestock during transport](#).'* (Cymdeithas Milfeddygon Prydain)

Dangosyddion cyflwr

- *'We support the animal-based approach. Evidence based indicators of positive welfare should be incorporated into welfare outcome assessments when possible, as promoted by the Farm Animal Welfare Committee (FAWC)'s "good life" framework. For example, behavioural opportunity for animals can be a key differentiator between some assurance schemes, which is linked to the potential for good animal health and welfare when delivered with excellent health and welfare outcomes. The standardised assessment of health and welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct assessment'.* (Cymdeithas Milfeddygon Prydain)
- *'To improve clarity and understanding, consideration should be given (yn y fersiwn Saesneg) to using the term "outcomes-based" rather than "animal-based". "Outcomes" contrasts more clearly with the "inputs" mentioned in paragraph 46, and reflects the language being proposed for postCAP agricultural policy in the recent "Sustainable farming and our land" consultation'.* (Cymdeithas Milfeddygon Prydain)

Ymladd ac ymddygiad ymosodol

Paragraff 50: Os gellir eu hadnabod, dylid cymryd moch cyson o ymosodol o'r grŵp ar unwaith a rhaid symud moch sy'n cael eu hanafu'n dost i gorlan filfeddygol iddynt gael eu trin a chael gwella, neu eu lladd heb boen. Gweler Atodiad 1 a pharagraffau 166 i 168.

- *'This paragraph does not mention who should treat the pigs in the hospital pen. If the injuries require more than medical treatment/minor surgery (not involving entry into a body cavity), then treatment would be reserved for a veterinary surgeon only. Given that this paragraph references 'serious injuries' which could require treatment beyond what the exemption provides for, we suggest adding a note that anything beyond medical treatment/minor surgery (not involving entry into a body cavity) is reserved for a veterinary surgeon.'* (Coleg Brenhinol y Milfeddygon)

Cloffni a briwiau ar y coesau

Paragraff 57: Nid yw moch sydd ddim yn gallu cerdded heb boen a moch sydd â briwiau agored difrifol neu brolaps yn cael eu hystyried yn ffit i deithio. Gall anifeiliaid sâl neu wedi'u hanafu gael eu hystyried yn ffit i deithio os ydy'r anaf neu'r salwch yn fach ac na fyddai'r daith yn achosi rhagor o ddioddefaint: os nad ydych chi'n siŵr, holwch filfeddyg. Os nad yw anifail cloff yn ymateb i driniaeth ar ôl ichi gael cyngor milfeddyg, rhaid ei ladd heb boen ar y fferm cyn gynted â phosibl yn hytrach na'i adael i ddioddef. Gweler paragraffau 62 i 66.

- *'We consider that making euthanasia a requirement after poor response is unjustified – it would be more appropriate for the paragraph to read 'seek further advice from the veterinary surgeon or consider culling'.* (Cymdeithas Milfeddygon Prydain)

Gofalu am anifeiliaid sâl ac wedi'u hanafu

Paragraff 58: Dylech gymryd camau ar unwaith os oes gennych fochyn sy'n ymddangos yn sâl neu wedi'i anafu. Dylech gysylltu â'ch milfeddyg os oes gennych unrhyw amheuan ynghylch achos yr afiechyd neu ynghylch y driniaeth orau, gan gynnwys mesurau i leddfu poen.

- *'This could be interpreted as supporting farmers in making their own diagnosis and deciding themselves what the appropriate treatment should be, which is not permitted under the VSA (1966). We recommend that this is reworded so as to avoid the suggestion that farmers can diagnose/decide on the most appropriate treatment.'* (Coleg Brenhinol y Milfeddygon)
- *'We welcome the code's recommendations to seek appropriate veterinary advice where relevant and ensure that veterinary advice is available when needed...The text should clarify that owners and keepers can achieve what the document sets out with relevant advice and expertise from appropriately qualified professionals, such as their veterinary surgeon, as opposed to requiring that owners and keepers possess all the skills listed in the document themselves, in isolation'* (Cymdeithas Milfeddygon Prydain)

Lladd ar y fferm

- *'There are many other sources of information on this very important area of pig welfare e.g. those from the [Humane Slaughter Association](#). We recommend that these are referenced in the document.'* (Cymdeithas Milfeddygon Prydain)

Defnyddio meddyginiaethau'n gyfrifol a chadw cofnodion

Paragraff 69: Dim ond milfeddyginiaethau sydd wedi'u hawdurdodi yn y DU y caniateir eu defnyddio a rhaid dilyn cyfarwyddiadau'r gwneuthurwr. Unrhyw beth yn wahanol, rhaid cael caniatâd y milfeddyg.

- *'We recommend changing the last two lines to say that POM-V medicines must be prescribed by a veterinary surgeon and administered in accordance with veterinary advice, and unauthorised veterinary medicinal products or authorised human medicinal products may only be used if prescribed by a veterinary surgeon under the prescribing cascade.'* (Coleg Brenhinol y Milfeddygon)

Llety

- *'Within the actual regulations extract –(c) see other pigs, except- (i) where the pig is isolated for veterinary reasons; or (ii) in the week before the expected farrowing time and during farrowing, when sows and gilts may be kept out of sight of other pigs; 14. Since these Codes are to be applicable to all keepers of pigs, there needs to be guidance to pet pig keepers about the keeping of single pet pigs as can commonly be the case – the regulation as it stands does not allow this.'* (Cymdeithas Milfeddygon Prydain)
- *'At paragraph 73 we would recommend the following small change in wording to ensure that the value of veterinary advice in terms of advising on appropriate accommodation is clearly articulated and opportunities to safeguard animal welfare are seized: 'Owner/keepers should seek appropriate welfare advice from a veterinary surgeon and technical advisor when new facilities are to be constructed or existing facilities are modified.'* (Cymdeithas Milfeddygon Prydain)

Cyfoethogi'r amgylchedd

- *'The new material on enrichment is a very positive addition and we urge that this is not diluted. The paragraph on objects such as footballs and chains is very helpful in outlining that certain objects should not be used alone as a means of enrichment. The table in paragraph 83 showing which objects are optimal, sub-optimal and of marginal interest is extremely clear and helpful to producers. It is based on many years of peer-reviewed research and practical experience and should remain in the Code.'* (Compassion in World Farming)
- *'Para 84: This paragraph is very helpful in outlining that enrichment needs to sustain interest. In the sentence: "should always be available and in sufficient quantity to allow all pigs the opportunity to interact" it would be helpful to add the words 'without competition' at the end. This is to avoid an interpretation that this means all pigs can interact with the enrichment at some point, and to make it clear that all pigs should be able to do so simultaneously if desired. In wild or outdoor-farming situations, pigs forage extensively and often all at the same time. Given that enrichment material in indoor systems is to enable natural foraging behaviour, it should be provided in sufficient quantities to allow all pigs to use it simultaneously.'* (Compassion in World Farming)

Tocio cynffonnau

Paragraff 128: Os oes angen tocio cynffon, rhaid ei wneud yn unol â'r gyfraith gan berson cymwys hyfforddedig cyn y seithfed dydd ym mywyd yr anifail, neu gan filfeddyg. Mae'n bwysig bod yr holl offer a ddefnyddir yn cael eu glanhau a'u diheintio rhwng toreidiau o foch.

- *'We recommend adding 'after the seventh day of life' immediately after 'surgeon' at the end of the first sentence.'* (Coleg Brenhinol y Milfeddygon)
- *'Although tail-docking is discouraged in the draft code, factory farms commonly perform it routinely instead of offering adequate substrate and enrichment. Used as a money-saving tool, tail-docking may cause pigs to develop neuromas – nerve damage in the tail stump – leaving them in constant pain.'* (People for the Ethical Treatment of Animals)

Rheoli a lleihau'r risg o frathu cynffonnau

- *'The new sections regarding how to avoid tail docking are extremely positive and greatly welcomed and we urge that these are not diluted.'* (Compassion in World Farming)
- *'The frustration and stress of extreme confinement can drive [Pigs] to engage in aggressive behaviour such as tail-biting. As a result, farmers cut off their tails and grind down their sensitive teeth, usually without painkillers – even though UK law prohibits the routine performance of these mutilations.... Wales must follow the lead of countries such as Norway, Sweden, and Switzerland and ban confinement systems of all kinds – including farrowing crates.'* (People for the Ethical Treatment of Animals)
- *'We strongly support recommendations for owners and keepers to work collaboratively with their veterinary surgeon to produce Farm Health and Welfare plans, carry out routine animal-based measures to monitor welfare and identify strategies to prevent and manage tail biting. We believe that the management and prevention of tail biting, which is a complex and multifactorial problem, are essential goals, given their impacts on animal health and welfare and the reputation of the pig farming industry. We are supportive of the information included in the code, and pleased to note that environmental enrichment is not being portrayed as a panacea, nor have environmental adjustments been identified as consistently or universally successful.'* (Cymdeithas Milfeddygon Prydain)

Rhygnu/tocio dannedd

- *'Large litters are a root cause for multiple health and welfare problems including injuries to piglets' faces and sows' udders. Teeth clipping is a mutilation employed to minimise this damage. We feel strongly that more detailed information on the effects of large litters should be given to help producers avoid many health and welfare problems, including how to comply with the legal ban on routine teeth clipping or grinding.'*

Paragraph 148 mentions that injuries to teats are reduced if extremely large litters are avoided, but it would be helpful if further detail on what constitutes 'extremely large' is given, in order to reduce ambiguity.' (Compassion in World Farming)

- Cafwyd crynodeb gan Compassion in World Farming o'r ymchwil i faint toreidiau.
- *'Some suggested altered wording for para 148: "...Injuries are reduced if sows are lactating well and do not have extremely large litters (above approximately 12 piglets). Cross fostering piglets from very large litters may help avoid injuries but can cause additional welfare problems for the nurse sow and piglets and therefore should not be seen as an alternative for breeding for responsible litter sizes. Sows genetically selected for excessive litter size should not be used. The number of piglets should not exceed the number of functional teats. Avoiding extremely large litters is shown to reduce piglet mortality, increase piglet weaning weights, reduce variability in piglet weights, and reduce the need for farrowing crates, cross fostering and teeth reduction".* (Compassion in World Farming)
- *'Tooth reduction must only be carried out upon the recommendation of a veterinary surgeon.'* (Coleg Brenhinol y Milfeddygon)
- *'As a result [of biting due to extreme confinement], farmers...grind down their sensitive teeth, usually without painkillers – even though UK law prohibits the routine performance of these mutilations.'* (People for the Ethical Treatment of Animals)

Ysbaddu

Paragraff 151: Dylai ceidwaid stoc bwysu a mesur yn ofalus a oes angen ysbaddu moch. Mae ysbaddu yn anffurfio'r corff a dylid ei osgoi os medrir. Rydym yn eich cyngori i ddefnyddio analgesia wrth ysbaddu perchyll llai na 7 niwrnod oed, nid dim ond moch sy'n 7 niwrnod oed neu'n hŷn. Gellir defnyddio dulliau heblaw ysbaddu, fel defnyddio brechlyn, er mwyn osgoi gadael i 'flas baedd' ddatblygu ar gig baeddod trymach.

- *'We too recommend that anaesthetic is used for all piglets and thus castration consequently being reserved for veterinary surgeons only, even where the Regulations permit a farmer/owner to castrate piglets under 7 days old.'* (Coleg Brenhinol y Milfeddygon)
- *'We strongly agree that mutilations should only be carried out having sought appropriate advice on possible alternative interventions in each case and not as a routine practice. The code should also reference that they should only be carried out to improve the welfare of pigs and that they must be undertaken by a trained and competent person.'* (Cymdeithas Milfeddygon Prydain)

Adran 2 – Argymhellion penodol ychwanegol

Hychod perchella a pherchyll

- *'The sentence that 'the aim is for farrowing crates to no longer be necessary' is a very positive step in terms of progress in pig welfare and this should not be diluted. The evidence that farrowing crates severely impair sow welfare is well established and accepted; furthermore a range of commercially proven free farrowing systems*

now exist that protect both sow and piglet welfare, whilst also achieving equal, or lower, piglet mortality rates compared with crates. Indeed, free farrowing systems designed and produced in Britain are successfully being used commercially in the UK, Ireland, Spain, USA, Australia and South Korea. Please see briefing by CIWF for more detail.’ (Compassion in World Farming)

- *‘A couple of weeks before they give birth, mother pigs are commonly confined to farrowing crates so small that they can’t even turn around – let alone fulfil their strong urge to build a nest – causing them severe discomfort and distress... Wales must follow the lead of countries such as Norway, Sweden, and Switzerland and ban confinement systems of all kinds – including farrowing crates. The Farm Animal Welfare Committee favours the universal use of free-farrowing systems, and although it is impossible to afford pigs all the Five Freedoms while farming them, not subjecting them to intensive confinement would spare them some of the most egregious suffering they currently endure.’ (People for the Ethical Treatment of Animals)*

Baeddod

- *‘As applies to other pigs within the Code, we suggest adding a paragraph to advise that: “Boars must be given a sufficient quantity of bulky or high fibre food as well as high-energy food to satisfy their hunger and need to chew. As with all pigs, effective enrichment material must be provided to boars.”’ (Compassion in World Farming)*

Moch sy’n cael eu cadw mewn systemau awyr agored

- *‘I would like to add to the code in respect to accommodation of pigs in outdoor husbandry.*

The concerns already expressed for ventilation and coolness have not been defined as applying to hot sunny weather. Although avoidance of frost has been mentioned a definition of the type of structure (besides flooring) has not been adequately defined for use during freezing winter conditions. More definition for the protective structure for outdoor pigs and piglets needs to be given. This should be a windproof and rain proof shelter without gaps that let in icy weather as easily as sunshine. It should also have bedding to enable keeping warm and dry in winter weather.

I say this as pallets are unsuitable for providing accommodation in wet, very cold and windy conditions but too often used for 3 sides of a to open structure. Specifically knocking together pallets should be against the code unless slat gaps are filled adequately.’ (Dienw)

Sylwadau ychwanegol

Archwiliadau heb rybudd

- *‘Authorities must also monitor conditions on farms via regular unannounced inspections and take stringent action against any facilities that fail to comply with welfare guidelines, including by seeking the prosecution of the workers involved. Currently, the inspections carried out by farm assurance schemes and government bodies are pitiful. They are very rarely, if ever, unannounced, so inspectors do not see a true representation of the routine welfare abuse and law-breaking taking place on farms all over the country.’ (People for the Ethical Treatment of Animals)*

- *Less than 1% of Red Tractor inspections are unannounced, and a 30-minute warning is given even for these. The RSPCA inspects ""RSPCA Assured"" farms once a year, and a minimum of just 30% of farms get a further unannounced inspection. It should not be down to animal protection organisations to do the job of these agencies. It is commendable that the Welsh government wants to update its code of practice for pigs, but it must ensure that inspections to enforce these standards are regular, unannounced, and thorough. Those who are ignorant or neglectful of legislation on the protection of the animals they raise must be subject to harsh penalties, and anyone abusing animals must receive a custodial sentence.'* (People for the Ethical Treatment of Animals)

Baeddod gwyllt

- *'We would recommend that the draft code also considers the farming and keeping of wild boar. In many cases, wild boar are shot on farm in an approved farm slaughter facility before being transported to an approved slaughterhouse. These processes result in additional handling risks and potential for escapes that could result in the development of feral populations. The draft code would present an opportunity to recognise and address these risks.'* (Cymdeithas Milfeddygon Prydain)

Rhannu'r cod newydd

- *'Welsh Government should work collaboratively with the professional and representative organisations of the stakeholders outlined at the start of this consultation to promote the code across their various communications channels, aiming to reach keepers and owners directly and those that work closely with these groups to ensure the high welfare of the pigs under their care. Further, consideration should be given to extracting certain sections of the Code of Practice, e.g. strategies for identifying, managing and preventing tail biting and the table on suitability of materials for providing enrichment and how this information could be meaningfully presented as quick reference resources to facilitate compliance from owners and keepers. In addition, thought should be given as to how to reach owners who keep pigs as pets with the messaging and best practice that is set out in the draft code'.* (Cymdeithas Milfeddygon Prydain)

2.2 Cwestiwn 2: Hoffem wybod eich barn ar yr effeithiau y byddai'r Cod Ymarfer ar gyfer Lles Moch yn eu cael ar yr iaith Gymraeg, yn benodol ar cyfleoedd i bobl ddefnyddio'r Gymraeg, a peidio â thrin y Gymraeg yn llai ffafriol na'r Saesneg. Pa effeithiau rydych chi'n credu y byddai? Sut y gellid gynyddu effeithiau positif a lliniaru effeithiau negyddol?

Dim ond Cymdeithas Milfeddygon Prydain (BVA) atebodd y cwestiwn hwn. Nododd y BVA yn ei hymateb ei bod yn bwysig sicrhau bod yr holl ganllawiau a dogfennau eraill am y mater hwn ar gael yn y ddwy iaith:

- *"BVA is aware of the Welsh language act and the importance of the Welsh language in Welsh communities, particularly in rural areas likely to be most affected by agricultural policy. Our high animal health and animal welfare standards rely on effective communication between farmers, their own vets and government vets, for example to enable effective disease surveillance to be carried out. Welsh language is an essential aspect of this communication and it is important for animal health and*

welfare that farmers in all parts of Wales are able to access information and guidance in their chosen first language.” (Cymdeithas Milfeddygon Prydain)

- 2.3 Cwestiwn 3: Eglurwch hefyd os gwelwch yn dda sut rydych chi'n credu y gall y polisi arfaethedig Cod Ymarfer ar gyfer Lles Moch gael ei lunio neu ei addasu er mwyn cael effeithiau positif ar gyfleoedd i ddefnyddio'r Gymraeg ac ar beidio â thrin y Gymraeg yn llai ffafriol na'r Saesneg; a pheidio â chael effeithiau andwyol ar gyfleoedd i ddefnyddio'r Gymraeg ac ar beidio â thrin y Gymraeg yn llai ffafriol na'r Saesneg.**

Ni chafwyd atebion i'r cwestiwn hwn.

- 2.4 Cwestiwn 4: Rydym wedi gofyn nifer o gwestiynau penodol. Os oes gennych unrhyw faterion cysylltiedig nad ydyn ni wedi mynd i'r afael â nhw, defnyddiwch y lle hwn i wneud hynny:**

Roedd ymatebwyr wedi sylwi ar gamgymeriadau fformadu yn y Cod newydd.

Mae ymatebion eraill i'r cwestiwn hwn wedi'u nodi yn y crynodeb o atebion i Gwestiwn 1 gan eu bod yn cyd-fynd yn well i'r cwestiwn hwnnw.

3. Camau Nesaf

Mae'r holl sylwadau a'r ymatebion i'r ymgynghoriad wedi'u dadansoddi. Caiff sylwadau a newidiadau a gynigir eu hymgorffori yn y Cod os gwelir bod hynny'n briodol. Caiff y Cod newydd ei adolygu gan y Pwyllgor Lles Anifeiliaid sy'n cynghori Llywodraethau Cymru a'r Alban ac Adran yr Amgylchedd, Bwyd a Materion Gwledig (Defra) ar les anifeiliaid.

Caiff drafft terfynol o'r Cod ei osod ger bron y Senedd am 40 niwrnod. Os na fydd y Senedd yn penderfynu diddymu'r drafft o fewn y 40 niwrnod hwnnw, bydd Gweinidog yr Amgylchedd, Ynni a Materion Gwledig yn cyhoeddi'r Cod yn y ffurf y'i gosodwyd ger bron y Senedd.

Atodiad A – Rhestr o'r mudiadau a ymatebodd i'r ymgynghoriad

Coleg Brenhinol y Milfeddygon (RCVS)

Compassion in World Farming (CIWF)

Cymdeithas Milfeddygon Prydain (BVA)

People for the Ethical Treatment of Animals Foundation (PETA)

Ynghyd ag ymateb dienw