

BVA written evidence on animal health for the Welsh Parliament's Climate Change, Environment and Rural Affairs Committee

Who we are

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) BVA Welsh Branch represents members in Wales, bringing together representatives of specialist and territorial divisions, government, academic institutions and research organisations in Wales. The branch advises BVA on the consensus view of members in Wales on Welsh and UK issues.
- 3) We welcome this opportunity to provide evidence in relation to animal health. As this is a broad topic, we have summarised some of our key concerns for Welsh Government to consider.

Antimicrobial resistance (AMR)

- 4) Antimicrobials are essential in veterinary work to treat infectious and zoonotic diseases, safeguard animal health and welfare, and ensure the production of safe, high quality food. We need to safeguard the use of existing antimicrobials and develop new ones.
- 5) The veterinary profession recognises AMR as an issue of critical importance to society. We are committed to providing leadership on this issue within the veterinary profession, and in collaboration with other health sectors. Our overall aspiration is to reduce the use of antibiotics in animals under our care alongside improving the health and welfare of those animals, particularly through good husbandry and disease prevention strategies. We have developed a [7-point plan](#) to promote the responsible use of antimicrobials, and our comprehensive [position on the responsible use of antimicrobials in food producing animals](#).
- 6) There are several important projects working to promote the responsible use of antimicrobials, including the Arwain Vet Cymru programme, which has already established a network of highly trained Veterinary Prescribing Champions across more than 80% of Welsh farm practices. Its success has been recognised beyond Wales, leading to the rest of the UK adopting this model. Welsh Government should continue to support this project and address the concerns highlighted by the prescribing champions.
- 7) Ongoing work by vets, farmers, and industry has already led to significant reductions in sales of antibiotics for use in food-producing animals^{1,2}. We support evidence-based

¹ <https://www.ruma.org.uk/wp-content/uploads/2020/11/SO-469-RUMA-Summary-download-021220.pdf>

² <https://www.ruma.org.uk/wp-content/uploads/2017/10/RUMA-Targets-Task-Force-Report-2017-FINAL.pdf>

targets to further reduce antibiotic usage in animal agriculture, as part of a global solution to address AMR.

- 8) AMR is a global problem and we support the 'One Health' approach to addressing it. Collaboration between the medical, veterinary and environmental stakeholders is a key element of the [UK 5-year action plan for antimicrobial resistance 2019-2024](#).
- 9) BVA is represented on the Wales Animal and Environment AMR delivery group and supports its [5 year implementation plan](#).
- 10) Welsh Government should:
 - incentivise improved husbandry and biosecurity measures on farm, within a system of government agricultural support. The involvement of veterinary surgeons will be essential to any such scheme.
 - prioritise the development of effective and rapid diagnostic tests that can be used on farm and in clinics.
 - continue to work with vets and industry to review and build on the success to date in reducing antimicrobial usage.

Bovine TB

- 11) Bovine tuberculosis (bTB) is a devastating chronic disease of cattle and is a major challenge facing large parts of the UK farming industry today. Bovine TB (*M. bovis*) is a zoonotic disease that can be transmitted to humans and infect other species such as badgers, deer, camelids, goats, pigs, dogs, and cats.
- 12) We support a holistic approach to tackling bTB that makes use of all the available tools in the toolbox. Behavioural science is front and centre of our approach to tackling this devastating disease. At the heart of our recommendations is empowering vets and farmers, and supporting their pivotal relationship. Our [position on the control and eradication of bovine TB](#) includes the following points:
 - rewarding farmers for good biosecurity practices through a framework for earned recognition
 - empowering private vets to advise their clients with timely, localised data
 - better data-sharing and communication between government vets and private vets
 - support for knowledge-based livestock trading
 - long-term funding for bTB advisory services
 - directing research funding to the areas which would have the greatest impact
- 13) We welcomed the creation of the Centre of Excellence for Bovine TB at Aberystwyth University, a hub for national and international research into Bovine TB. [Our position](#) highlights our research priorities, which include the development of a cattle vaccine and improved tests, and a better understanding of the effects of badger vaccination on the incidence of bTB in cattle.
- 14) Well-conceived, collaborative, industry-led programmes of disease eradication which

farmers can easily follow can have positive impacts. The veterinary profession is best placed to deliver such schemes. The Wales [Cymorth TB](#) farmer support programme launched in 2015 is an excellent example of an effective collaboration between private vets, government vets and the farmer.

- 15) Welsh Government should secure the long-term funding for dedicated bTB advisory services, providing permanence and assurance for service users and incorporating lessons from social scientists into the wider design.

Eu-Exit and veterinary capacity

- 16) International movements of live animals, products of animal origin (POAO) as well as pet animals and equines pose a risk as these may carry pathogens that can be a threat to public health and the health of animal populations. Sanitary and phytosanitary (SPS) measures are those measures to protect humans, animals, and plants from diseases, pests, or contaminants. SPS measures form a vital part the wider biosecurity framework and should not be seen solely as a barrier to trade that needs to be overcome.
- 17) The vital role of veterinary surgeons in trade, protecting public health, food safety and animal health and welfare is recognised around the world. Veterinary certification and controls form a vital part of the biosecurity framework for the UK and our trading partners. Now that Britain has left the EU, the volume of paperwork vets need to complete to certify exports of animals and animal products has increased significantly.
- 18) BVA has been raising concerns about veterinary capacity since the EU referendum, as around half of new vets registering in the UK each year are from the EEA. Covid-19 has placed additional pressure on veterinary capacity as fewer vets came to work in the UK during 2020 and capacity within veterinary teams is being stretched by the introduction of working practices to protect against the risk of Covid-19. We are also concerned that the threat of some exotic diseases is currently high – for example Highly Pathogenic Avian Influenza and African Swine Fever – potentially placing additional pressure on veterinary capacity.
- 19) The [BVA assessment of border readiness ahead of the end of the Brexit transition period](#) summarises our key concerns in relation to this issue. The recent trade deal does not remove the need for veterinary export health certification for goods moving in and out of GB. This places an enormous pressure on veterinary capacity and, despite concerted efforts by the veterinary profession and industry, we remain concerned about how we can meet these increased certification demands.
- 20) Eu-exit presents opportunities for the UK to negotiate new trade deals. We must safeguard the UK's high reputation for animal health, animal welfare, and food safety in any new trade deals. Investment at home must not be undermined by UK trade policy, for example there may be concerns that a trade deal with New Zealand could result in over supply of imported lamb, which would be detrimental to the sheep sector³.
- 21) We must continue to recognise and protect the benefits of geographical indications on some products, where those products are valued by consumers at home and abroad. Welsh lamb is a good example of an opportunity to promote high-quality high welfare UK produce to export markets, which Government should look to maximise, as well as

³ <https://www.bva.co.uk/media/3793/bva-submission-to-the-house-of-lords-eu-international-agreements-sub-committee-uk-nz-trade-negotiations-final-v2-for-website.pdf>

seeking to protect and promote local traditional specialities.

Post-CAP agricultural policy

- 22) The new agricultural policy offers an opportunity to improve animal health and welfare in Wales, and should be both ambitious and focussed on delivering outcomes. It is crucial that this new policy offers the best opportunities to develop a strong, competitive and innovative food industry which enjoys the confidence of consumers at home and abroad, and is resilient to the potential changes in our relationships with trading partners following the UK's departure from the EU.
- 23) We are broadly supportive of the Welsh Government's 'Sustainable Land Management' policy framework, and were pleased that the proposals "*explicitly recognise the interaction between food production and environmental outcomes*". It is essential that animal health and welfare are central in any new agricultural policy and should feature more prominently.
- 24) The new Welsh Agricultural policy must make it clear that ensuring the health and welfare of sentient animals is important as a marker of social progress, as well as for the role it plays in achieving other sustainability objectives such as reducing AMR as an environmental benefit. Sustainable animal agriculture is defined as "animal agriculture carried out in a way that meets the needs of the present without compromising the ability to meet the needs of the future". It should be undertaken in a way that is environmentally, ethically, and economically acceptable for consumers, producers, and wider society. Safeguarding the highest standards of health and welfare for production animals must be recognised as a key sustainability objective.
- 25) Under the One Health agenda, policies relating to sustainable animal agriculture must also address the use of natural resources and the protection and conservation of wild species, habitats, and biodiversity, in order to reduce the ecological footprint of animal agriculture as a whole. Changes in animal production and farming practices are necessary to increase the efficiency of agriculture and mitigate its environmental impact. In our [Sustainable animal agriculture position](#), we promote the benefits of properly valuing quality animal-derived products, where quality encompasses good animal health and welfare, food safety, environmental protection, a fair return for producers, and encourage consumers to [#ChooseAssured](#).
- 26) There is a large body of evidence supporting the environmental benefits of various aspects of livestock farming in Wales^{4,5,6,7,8}. These include carbon sequestration in grazing pastures, particularly leguminous pastures, reduction of methane emissions through disease eradication, increased productivity, reduced losses and increased feeding efficiency, and reduced food miles from consuming locally produced food.

⁴ Skuce et al. 2016. Livestock Health & Greenhouse Gas Emissions. ClimateXchange, Scotland's Centre of Expertise on Climate Change. https://www.climateexchange.org.uk/media/2031/livestock_health_and_ghg.pdf

⁵ Llonch et al. 2017. Current available strategies to mitigate greenhouse gas emissions in livestock systems: an animal welfare perspective. *Animal*. 2017 Feb;11(2):274-284. doi: 10.1017/S1751731116001440

⁶ Patra, A.K. 2016. Recent advances in measurement and dietary mitigation of enteric methane emissions in ruminants. *Frontiers in veterinary science*, 3: 39. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4873495/X>

⁷ Statham, J. et al. 2017. Climate change and cattle farming. *In Practice* 39.1: 10-19.

⁸ Pol-van Dasselaar, A. 2017. EIP-AGRI Focus Group Grazing for carbon, Starting Paper.

https://ec.europa.eu/eip/agriculture/sites/agri-eip/files/eip-agri_fg_grazing_for_carbon_final_report_2018_en.pdfX

Recent research published by Oxford University demonstrates that ruminants can offer a viable pathway to net zero emissions from UK agriculture, in keeping with the target date of 2030, which is a key consideration with respect to any decision on which outcomes will be rewarded via direct payments. This research provides further evidence that UK ruminant agriculture can create positive Sustainable Land Management (SLM) outcomes.

- 27) As a minimum, evidence of compliance with baseline legislative requirements should be included in the entry requirements for all farmers with animals applying for the sustainable land management scheme. Improved animal health and welfare, beyond the legal minimum, should also be recognised as an outcome with ongoing financial support being provided for good practice above the statutory requirements and where improvements are made.
- 28) Specifically recognising the importance of animal health and animal welfare as SLM outcomes, within the environmental and social as well as economic benefit categories, would reflect the Welsh government's belief that animal sentience should be enshrined in law⁹, their commitment to the concept of One Health and keeping the people of Wales safe by protecting them from disease, and their recognition that high animal welfare and food safety standards are the foundations underpinning consumer confidence in Welsh produce, both at home and abroad.
- 29) The veterinary profession has a crucial key role to play in rural communities. Veterinary surgeons work with clients to improve animal health and welfare, provide preventive healthcare and treatment, and undertake health monitoring and surveillance. Official Veterinarians (OVs) certify the trade in animals and animal products - contributing to economic prosperity, the protection of public health, and the sustainability of food production.
- 30) As mentioned above, veterinary capacity remains a concern. BVA welcomed the launch of the new Vet School at Aberystwyth University, which will see its first cohort of students arrive for the 2021/22 academic year. With a particular focus on farm livestock and an ambition to train vets to work in Wales which could, in due course, help with veterinary capacity in Wales.

Welfare at slaughter

- 31) Animal health and welfare must be protected throughout the slaughter process (from preparation on-farm, to transport, handling and killing operations at the abattoir) so that animals receive the most humane death possible. We support the Farm Animal Welfare Council's (FAWC) principles of humane slaughter as set out in the [FAWC opinion and reports on the welfare of farmed animals at slaughter or killing](#).
- 32) Slaughter processes should be designed to minimise avoidable pain, distress, fear, and suffering. To build on current legislation and best practice, and ultimately improve welfare at slaughter, [our policy position](#) sets out 67 recommendations for government, industry, researchers, and the veterinary profession across each stage of the slaughter process.
- 33) We are calling on the Welsh Government to introduce mandatory CCTV in abattoirs in all areas where live animals, or animals being slaughtered, are present with unrestricted

⁹ Lesley Griffiths, Cabinet Secretary for Energy, Planning and Rural Affairs, Written Statement - Animal Sentience, <https://gov.wales/about/cabinet/cabinetstatements/2018/animalsentience/?lang=en>

access to real time and stored footage for OV's.

Surveillance

- 34)** The UK veterinary surveillance network is vital to identifying and managing threats to public health, trade, and wider society from animal diseases. Veterinary surveillance and animal health and disease monitoring is equally important across livestock, equine, wildlife, and companion animals.
- 35)** Continued monitoring of new and emerging diseases through data collection, analysis, and sharing across species provides high-quality intelligence on animal health and welfare. This helps policymakers, veterinary professionals, and animal keepers to take decisions to improve animal health and welfare and productivity, as well as identify and manage threats to public health, trade, food quality, the environment, and leisure and tourism.
- 36)** As members of the European Union (EU), the UK benefited from systems that monitor new and emerging disease through data collection, analysis and sharing across species. These provided high-quality intelligence on animal health and welfare that enables policy makers, veterinary professionals and animal keepers to take decisions to improve animal health and welfare, productivity, and identify and manage threats to public health, trade, food quality, the environment and leisure and tourism. Now that we have left the EU, it is important shared surveillance will continue to be a priority, with structures in place to ensure ongoing cooperation and collaboration.
- 37)** A robust surveillance system is vital to the health of UK livestock and the free sharing of animal health surveillance data would benefit such a system. It will be important to ensure that capacity and capability of the domestic surveillance system, which has been under financial pressure in recent years, is maintained at an appropriate level irrespective of legislative requirements post-Brexit.
- 38)** We're calling on the UK governments and other key stakeholders to work collaboratively to modernise and optimise existing animal health and disease monitoring networks across livestock, equine, wildlife, and companion animals. Our key recommendations from our [position on veterinary scanning surveillance](#) are:
- maintain the current level of government resource spent on the scanning surveillance network;
 - adopt new approaches to data collection and feedback, including incentivising the submission and sharing of data;
 - optimise appropriate skills and expertise by reinforcing the role and status of Veterinary Investigation Officers across the UK;
 - rethink traditional approaches to funding and coordination;
 - articulate the value of surveillance reporting to the veterinary profession to increase awareness and participation; and
 - work collaboratively with stakeholders to explore innovative communication strategies.

Welfare during transport

- 39) Any movement of animals will have a potential impact on their health and welfare. Whatever the type and scale of movement, the welfare of animals must be prioritised with the aim of reducing the impact of the movement as far as is reasonably possible.
- 40) The UK government has been clear in its manifesto commitment to control the export of live animals for slaughter and to make improvements to the current regulatory regime. [The Farm Animal Welfare Committee opinion on the welfare of animals during transport was published](#) following a call for evidence in 2018, and we [welcomed the recent announcement of the consultation for England and Wales](#).
- 41) Animals should be slaughtered as close as possible to where they are reared, and should not be exported to countries for non-stun slaughter.
- 42) BVA supports current legal requirements (European Community Regulation 1/2005 and the UK Welfare of Animals (Transport) Orders and Regulations) that are in force to protect the health and welfare of livestock during transport. The implementation of current legal requirements should be improved to ensure that requirements relating to appropriate transport conditions and fitness to travel of animals are adequately enforced.
- 43) We do not support the call to ban live export as this focuses on journey times and distance, instead of the complex picture of animal welfare during transport as a whole.
- 44) We'd welcome additional measures to protect the welfare of animals being transported. Any improvements should be evidence-based, informed by a welfare outcomes approach, and consider how proposals would work in all of the UK administrations. However, additional legal requirements are only beneficial if they are effectively enforced.
- 45) To build on existing legal requirements, in [our policy position](#) we also call for:
- certified training for farmers, drivers, and hauliers;
 - improved veterinary supervision and access to veterinary care during journeys; and
 - no animal to be exported to a destination with unknown welfare standards or exported to be raised in systems banned in the UK due to welfare considerations.