

## **BVA Northern Ireland Branch Response to DAERA Consultation on Future Agricultural Policy Proposals for Northern Ireland**

### **Who we are**

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 19,000 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. The BVA's Northern Ireland Branch brings together representatives of local veterinary associations, BVA's specialist divisions, government, and research organisations in Northern Ireland. The Branch advises BVA on the consensus view of the Northern Ireland members on local and United Kingdom issues.

### **Introduction**

3. The future of agricultural support is of great interest to the veterinary profession because veterinary surgeons play an integral part of the agricultural and food sectors.
4. Veterinary surgeons provide preventive healthcare and treatment for livestock, as well as carry out surveillance, promote good biosecurity, promote high animal health and welfare and boost productivity. Authorised Veterinary Inspectors (AVIs) ensure food safety and enable trade in animals and animal products. Veterinary surgeons working in Government provide an important public service throughout the food chain from disease control to safeguarding animal health and welfare.

### **Animal health and welfare**

5. In 2017, BVA set out a veterinary vision for how agricultural policy should look after the EU membership referendum.<sup>1</sup> That document called for the concept of public goods to be at the heart of a new post Brexit agricultural policy to benefit producers, consumers, and wider society. Specifically, we urged for the use of public money to incentivise and support animal health and welfare outcomes as public goods.
6. In our response to 'Northern Ireland Future Agricultural Policy Framework' we noted our disappointment that animal health and welfare had been largely overlooked. We called on DAERA to develop an agricultural policy which would "support animal health and welfare which underpins the reputation of Northern Ireland's agricultural exports."
7. The latest framework has four key outcomes of increased productivity, environmental sustainability, improved resilience, and an effective functioning supply chain. It is again disappointing to see insufficient weight being given to animal health and welfare alongside these aims.
8. Animal health and welfare is interwoven with many social, economic, and environmental outcomes. We would caution against an approach which does not consider animal health and welfare alongside efforts to increase economic or environmental sustainability. Such an approach would fail to maximise the benefits of evident synergies. Agriculture cannot be considered sustainable if it is achieved at an unacceptable cost to animal welfare.

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<sup>1</sup> <https://www.bva.co.uk/media/1179/bva-veterinary-vision-for-post-brexit-agricultural-support.pdf>

9. The interconnections between human wellbeing, animal wellbeing and environmental wellbeing are more pronounced than ever.<sup>2</sup> A 'One Health' approach is critical to addressing health threats in the animal, human and environment interface.<sup>3</sup>
10. The contribution of improved animal health is vast. According to the World Organisation for Animal Health (OIE), over 20% of animal production losses are linked to animal diseases.<sup>4</sup> The cost has already been recognised by DAERA:

*"Bovine Tuberculosis (bTB) has proved a challenging problem for the NI livestock industry. Substantial costs have been incurred attempting to eradicate the disease - annual public expenditure on the bTB Eradication Programme is currently around £40m. It is estimated that Bovine Viral Diarrhoea (BVD) costs industry here in the region of £24m each year."*<sup>5</sup>

11. The Scottish Government has been able to assess the economic benefits of controlling avoidable endemic disease:

*"it is estimated that veterinary interventions have significant economic impact through avoidable costs to the industry and taxpayer. The avoided costs attributable to veterinary services in Scotland for 30 endemic diseases of farm animals were estimated to be between £100m and £154m per annum. The avoided costs due to veterinary control measures stopping exotic disease outbreaks (FMD, Bluetongue and AI) were estimated at £135m per annum. Likewise, avoided costs from controlling and minimising outbreaks of BSE, salmonella, campylobacter and E.coli O157 were estimated at £96m per annum."*<sup>6</sup>

12. Recently, Animal Health Ireland noted that their disease programmes were estimated to have saved Irish farmers and the agri-food industry at least €135m per year by reducing BVD and mastitis.<sup>7</sup>
13. In 2019, DAERA consulted on a draft strategic framework for animal health and welfare policy in Northern Ireland. It is unacceptable that two and half years after the publication of that consultation no post-consultation report or final strategic framework has been published. This is particularly worrying as this framework is not listed alongside other key strategies and frameworks within section 1.4 of the consultation: strategic context.

## Veterinary engagement

14. Veterinary surgeons are uniquely placed to advise and influence sustainable animal husbandry practices at whole-system levels, safeguarding animal health and welfare and influencing sustainable future livestock and food production. No trade in live animals and animal products can take place without veterinary certification and veterinary surgeons are crucial in protecting public health (including food safety).
15. At a local level, the relationship between a farmer and their vet is paramount when it comes to any effort improve animal health and welfare outcomes. A new agricultural policy offers an opportunity to harness the power of this relationship and empower farmers and vets to collaborate to see positive outcomes on farm.
16. Thus, the involvement of the veterinary profession within any system of agricultural support should be an integral part of any policy development, review and implementation. It is very disappointing that the document makes only one mention of veterinary professionals, and we believe it is a significant misrepresentation of the important roles they play. Furthermore, an opportunity has been missed to capture from

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<sup>2</sup> [https://www.bva.co.uk/media/3145/bva\\_one\\_health\\_in\\_action\\_report\\_nov\\_2019.pdf](https://www.bva.co.uk/media/3145/bva_one_health_in_action_report_nov_2019.pdf)

<sup>3</sup> <https://www.euro.who.int/en/health-topics/health-policy/one-health>

<sup>4</sup> Animal Health: A multi-faceted challenge, OIE August 2015

<sup>5</sup> DAERA Consultation Paper: Draft NI Animal Health & Welfare Strategic Framework

<sup>6</sup> <https://www.gov.scot/publications/preliminary-economic-assessment-veterinary-professions-value-scotland/>

<sup>7</sup> <https://www.irishexaminer.com/farming/arid-40799934.html>

the outset the central role of veterinary expertise in increasing productivity, enhancing environmental protection, and improving resilience.

17. Engagement with the veterinary profession in the development of the policy has been limited to date. As a matter of urgency this must be redressed.

## Resilience Measure

18. We recognise the specific context of farming in Northern Ireland. Of the four constituent parts of the UK, Northern Ireland is most reliant on agriculture in terms of the share of Gross Value Added (GVA) and percentage share of total employment. Conversely, however, Northern Ireland also has the smallest average farm size within the UK.
19. Northern Ireland farmers are more dependent on direct payments than their counterparts elsewhere in the UK. It has been estimated that EU subsidies make up between 50 and 60 per cent of farm income in the UK.<sup>8</sup> However, it is estimated, within the Northern Ireland Future Agricultural Policy Framework consultation document, that this provides 83 per cent of total farming income in Northern Ireland. It is therefore understandable that DAERA would wish to maintain a level of area-based resilience payment.
20. It is proposed that the eligibility criteria will include compliance with a new set of Farm Sustainability Standards which will be the proposed replacement for current Cross Compliance requirements (i.e. Statutory Management Requirements (SMR) and Good Agricultural and Environmental Condition (GAEC)).
21. Removing SMRs and replacing eligibility with an environmentally focused set of measures is concerning for the veterinary profession. This is because the majority of SMRs focus on issues of animal health, animal welfare, public health and food safety – all of which are of the utmost importance to the veterinary profession. It will be essential that there is no downgrading in what is expected in relation to animal health, animal welfare, public health and food safety:
  - SMR 1. Protection of Water against Nitrates Pollution
  - SMR 2. Conservation of Wild Birds
  - SMR 3. Conservation of Natural Habitats and of Wild Flora and Fauna
  - SMR 4. Food and Feed Law
  - SMR 5. Restrictions on the Use of Substances Having Hormonal or Thyrostatic Action and Betaagonists in Farm Animals
  - SMR 6. Pig Identification and Registration
  - SMR 7. Cattle Identification and Registration
  - SMR 8. Sheep and Goat Identification and Registration
  - SMR 9. Prevention, Control and Eradication of Transmissible Spongiform Encephalopathies (TSE)
  - SMR 10. Restrictions on the Use of Plant Protection Products
  - SMR 11. Minimum Standards for the Protection of Calves
  - SMR 12. Minimum Standards for the Protection of Pigs
  - SMR 13. Protection of Animals Kept for Farming Purposes
22. Reducing the animal health, welfare and food safety eligibility requirements without proposing any new animal health, animal welfare or food safety measures within the wider consultation document is unacceptable.

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<sup>8</sup> House of Commons Library, EU Referendum: Impact on UK Agriculture Policy, 2016

## Crisis framework

23. We welcome that the department is considered a framework to assess potential risks and determine the most appropriate intervention for a specific crisis. This appears to be a sensible approach to provide some certainty to stakeholders.
24. It is disappointing that there is no reference to animal disease in this section. Animal disease will form a considerable portion of the potential risks that any individual farm business or wider sector is likely to face at both a local and national level. Consequently, it is important to include the veterinary profession in any discussion of a crisis framework.
25. There is a proposal that “farmers will be required to do as much as they can to build resilience into business practices”. Improved health status, biosecurity and husbandry will also reduce disease risk, leading to a more financially resilient sector. However, again there is no reference to any of these aspects of risk-minimisation within this section.

## Headage Sustainability Package

26. There is increasing recognition that animal agriculture can be a contributor to environmental degradation, climate change, habitat loss and waste. Changes in UK animal production and farming practices are necessary to increase efficiency of agriculture and mitigate environmental impact.
27. We support using these payments to incentivise reducing the age of first calving or reducing the calving interval to improve productivity and environmental sustainability through efficiency. DAERA should engage with the veterinary profession to develop this proposal further to ensure animal health and welfare are fully considered.
28. However, it is disappointing that this proposal fails to make any reference to tackling endemic disease. Research shows that “dealing effectively with endemic livestock diseases represents an opportunity to reduce emissions from the livestock sector, often without compromising productivity or farm economics.”<sup>9</sup>
29. As a first step, DAERA should engage directly with the veterinary profession on developing an animal health and welfare proposal as part of the headage sustainability package. BVA and our specialist divisions will be able to draw upon our experience co-designing the Animal Health and Welfare Pathway in England. BVA holds a seat on the Pathway steering group which is mapping out how farmers, vets and government will work together to deliver sustained improvement in animal health and welfare over time.
30. From Spring 2022, annual animal health and welfare reviews will take place in England. The Review is a fully funded vet visit, that farmers will receive on a yearly basis. Farmers’ own vets will carry out diagnostic testing, collect data, and provide bespoke advice. The initial focus will be on improving disease prevention and controlling or eradicating an industry-agreed list of diseases in each species. The vet is primarily there to support the farmer, but the data collected will be shared centrally to give a better understanding of the health and welfare of England’s national and regional herd and flock.

## Farming for Nature Package

31. As a health-centred profession and key stakeholder in the One Health agenda, we support the development of policies that address the use of natural resources, protection and conservation of wild species, habitats and biodiversity in order to better protect the environment which both humans and animals share and reduce the

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<sup>9</sup> [https://www.climatechange.org.uk/media/2031/livestock\\_health\\_and\\_ghg.pdf](https://www.climatechange.org.uk/media/2031/livestock_health_and_ghg.pdf)

ecological footprint of animal agriculture as a whole. As highlighted by the Food and Agriculture Organization of the United Nations:

*“If managed sustainably, agricultural sectors can contribute to important ecosystem functions. These include maintenance of water quality, nutrient cycling, soil formation and rehabilitation, erosion control, carbon sequestration, resilience, habitat provision for wild species, biological pest control and pollination.”*<sup>10</sup>

- 32.** Actions to enhance biodiversity should consider the benefits of effective use of parasiticide products. These products are commonly used in veterinary medicine to prevent and treat for various parasites, including fleas, ticks and worms. As well as preventing animal health and welfare problems, human health risks from associated zoonotic threats have to be considered.
- 33.** Recently, concerns have been raised that some of these medicines are contaminating the environment. Parasiticides could be reaching rivers through wastewater from premises where animals are kept, or from animals entering rivers. Parasiticides may also be excreted in urine and faeces and absorbed into soil. As parasiticides are harmful to a wide range of invertebrates, environmental contamination is highly detrimental to wildlife, ecosystems and biodiversity and there are concerns about how this in turn can impact public health. In the farm animal and equine sectors, there are concerns over high levels of resistance to parasiticide products as a result of misuse and overuse.
- 34.** The use of anthelmintics must be judicious and incorporated within a farm-specific strategic anthelmintic plan based on sound scientific principles, recognising that every application will increase the risk of possible development of resistance to anthelmintics. Incentivising veterinary engagement on farm to develop and implement such plans alongside farmers would be a tangible way to improve biodiversity on farm while maintaining animal health, animal welfare and public health.

## Farming for Carbon Measures

- 35.** Improving animal health and welfare can support the aims of a transition to a net zero economy. As a One Health orientated profession we understand these can be mutually reinforcing aims. Consequently, a transition to a net zero economy offers opportunities for animal health and welfare.
- 36.** In our One Health in Action report, we note:  
*“A degraded environment will have a big impact on human and animal health and welfare. According to The Lancet, climate change is “potentially the biggest global health threat of the 21st century”. These negative health impacts will increase in frequency and severity if the temperature rise exceeds 1.5°C.”*<sup>11</sup>
- 37.** Consequently, it is once again a disappointment to see no mention of endemic disease included within this section. Reducing endemic livestock diseases represents an opportunity to reduce emissions from the livestock sector through increased productivity. Improving animal health data can act as a useful indicator for meeting environmental goals.
- 38.** It would be beneficial for DAERA to more clearly establish the link between improving animal health with increased productivity for the farmer and meeting the environmental aims of the Executive. Endemic disease control is a more tangible goal for farmers, with more direct benefits for the individual farmer. This is also a goal that would be built on the existing support of the vet-farmer relationship.

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<sup>10</sup> FAO, 2017. Sustainable agriculture for biodiversity: Biodiversity for sustainable agriculture. Available at: <http://www.fao.org/3/a-i6602e.pdf>

<sup>11</sup> [https://www.bva.co.uk/media/3145/bva\\_one\\_health\\_in\\_action\\_report\\_nov\\_2019.pdf](https://www.bva.co.uk/media/3145/bva_one_health_in_action_report_nov_2019.pdf)

39. When collecting baseline data to achieve a reduction in greenhouse gas emissions, it is important to accurately assess the global warming potential (GWP) of different greenhouse gases produced by animal agriculture and develop policies to mitigate these emissions accordingly. Research by International Panel on Climate Change (IPCC) scientists from Oxford Martin School, Oxford University has demonstrated that rather than treating all greenhouse gases with a 'one-size fits all approach', there are two distinct types of emissions, and they should be treated differently by using an adapted GWP metric.
40. For example, carbon dioxide (from farm vehicles, buildings, equipment, imported feed) and nitrous oxide (primarily from artificial fertilisers) are long-living pollutants that persist in the atmosphere. Whereas methane (produced from livestock) is a short-living pollutant that reduces over time (over an approximate 10-year cycle), meaning that methane emissions will replace old emissions and have a neutral warming impact (as long as the number of UK livestock remains at the same level).
41. Climate change and agricultural policies should therefore be designed to reflect this difference. To affect the largest change, efforts should initially be focused on reducing the long-living emissions that are produced by animal agriculture eg. carbon dioxide and nitrous oxide. However, the UK's agricultural community must not lose sight of the fact that for methane to continue having a neutral impact, emissions must still fall, but only by 0.3% each year.

## Investment Measure

42. Good animal health and welfare is paramount from farm-to-fork. Grants should support animal health and welfare as goals in and of themselves. Therefore, we welcome the use of grants to improve animal health and welfare outcomes within a new agricultural policy.
43. We welcome that, in this section, animal health and welfare and biosecurity are recognised as DAERA Policy Objectives and thus eligible for consideration.
44. The relationship between a farmer and their vet is paramount when it comes to any effort to improve animal health and welfare outcomes. An animal health and welfare grants scheme presents an opportunity to harness the power of this relationship and empower farmers and vets to collaborate to see positive outcomes on farm.
45. As a first step DAERA should engage directly with the veterinary profession on developing an animal health and welfare proposal as part of the headage sustainability package. BVA and our specialist divisions will be able to draw upon our experience co-designing the grants aspects of the Animal Health and Welfare Pathway in England.

## Knowledge Measures

46. In the Vet Futures report<sup>12</sup> the veterinary profession recognised there is value attached to technology and innovation. There have been significant developments in recent years in the areas of genomic sequencing, big data, remote data collection, pen-side testing and other diagnostic tools, drones, genetically modified organisms, and social media. Vets are closely involved with the development of these technologies. They are also embracing opportunities to create new services, improve the efficiency of, and access to, existing services, deliver quality information to clients and the broader public, and to share learning.
47. We welcome efforts to incentive education, CPD and knowledge exchange. In this arena Northern Ireland has been ahead of other parts of the UK, starting early with the availability of a GCSE in Agriculture and Land Use. There is also a framework providing high quality higher and further education across FE Colleges, CAFRE, Queens

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<sup>12</sup> <https://www.vetfutures.org.uk/resource/vet-futures-report/>

University and Ulster University. This is an opportunity to capitalise upon this existing structure.

48. Opening a new vet school in Northern Ireland could present further opportunities to encourage young people from our local community to pursue a veterinary career as well as building on our strengths in veterinary research and knowledge transfer.
49. Equally as important as commissioning new research, is taking primary research and finding the application in the real world. Vets are well placed to provide this function, even when the primary research has been undertaken by non-vets. There is a need to have channels to disseminate research and new information to vets, farmers, and the public. Consideration should be given to what information is useful to farmers and there should be greater utilisation of behavioural approaches to encourage the application of research findings into practice.
50. Greater application of social science should form a central aspect of a knowledge transfer proposal. Social sciences provide an insight into farmers' decision-making, the application of biosecurity measures on farm, and how decisions that promote disease control can be incentivised.
51. Investment in measures make achieving desirable outcomes and compliance with basic standards easier would be beneficial. For example, investment in a well-conceived programme of CPD for farmers has the potential to positively impact many areas of concern, including animal health and welfare, AMR, productivity and carbon usage.
52. Private veterinary surgeons are trusted advisors to farmers and uniquely positioned to offer advice and work closely with farmers and animal keepers to counsel and signpost to the appropriate course of action. Veterinary involvement ensures biosecurity measures are formulated and implemented appropriately and health and disease threats are monitored and acted upon. Both private veterinary surgeons and Government employed veterinary surgeons, are uniquely positioned to make every on-farm contact count by advising on overall herd health and welfare, wider determinants and, in turn, disease surveillance and prevention.
53. Vets can use their insight and judgement to take new information and apply it to the specific context of each sector, farm, and farmer. The skills necessary for this need to be developed over time. Vets understand that farms are complex systems with many people having a role in decision making.
54. Thus, the involvement of the veterinary profession within any new education and knowledge exchange measure will be integral to converting knowledge into action and thus achieving animal health, animal welfare, environmental and productivity gains.

### **Generational Renewal**

55. We welcome the fact that barriers to women in agriculture is mentioned within this section. However, the experiences and barriers of women within agriculture are not limited to the issue of generational renewal and should be developed further across the framework. The consideration of women in agriculture should consider all professions in agriculture including veterinary surgeons. The veterinary profession has a large proportion of women, and it is essential that their important contribution is valued throughout the agricultural sector.
56. Developing an evidence base would be a meaningful first step to underpin policy and practice in Northern Ireland. We are aware that the Committee for Agriculture, Environment and Rural Affairs has recently completed a survey on "Breaking the 'Grass' Ceiling: Barriers for Women in the Agriculture Sector" which could inform the Department's next steps.

57. This should be connected to the knowledge measures proposals. In Scotland, training and skills development have been the cornerstone of their Women in Agriculture initiative. Much of their learning could easily be adopted here.

### Livestock Genetics and Data

58. Progress has been made in understanding the genetic basis of infection resistance in cattle, enabling genetic selection for higher resistance. This sensible approach could, in the long term, make a valuable contribution to disease control. Scientists have identified genetic traits in cattle that might allow farmers to breed livestock with increased resistance to bTB.<sup>13,14,15</sup> The research demonstrates that resistance of dairy cattle to *M. bovis* is partly heritable. The extensive research was undertaken jointly by the University of Edinburgh, Roslin Institute and Scotland's Rural College (SRUC), and supported by Defra and the Welsh Government.
59. This work showed genetic variation between animals and forms the basis of the TB Advantage, a genetic index utilising data on over 650,000 Holstein cows who have bTB data recorded by APHA. This data has been used to establish breeding patterns and identify more resistant bloodlines. TB Advantage is only currently available for the Holstein breed, but work is under way to establish if the index can be extended in the longer term to other dairy and beef breeds.
60. Breeding cattle with a reduced susceptibility to bTB is a long-term approach to disease control. Furthermore, genetic differences are not the only factor in determining whether or not an animal will become infected with bTB; various environmental factors as well as differences in the bTB bacteria may also affect susceptibility. However, if farmers can choose animals with better genotypes for bTB resistance, then this information can be applied in new breeding programmes alongside other control strategies.
61. There is an opportunity for industry in Northern Ireland to expand on this example to include more species and cover a greater range of factors.
62. It will be imperative to include the veterinary profession within the development of this proposal to ensure animal health and welfare are thoroughly considered at each step of the process including on farm.
63. BVA supports provision of data to farmers and vets to inform their decision making. It will be essential to consider carefully what data should be provided and how that information should be presented to support the desired behavioural change.

### Controls and Assurance

64. The majority of SMRs focus on issues of animal health, animal welfare, public health and food safety – all of which are of the utmost importance to the veterinary profession. It will be essential that there is no downgrading in what is expected in relation to animal health, animal welfare, public health and food safety.
65. In the consultation document it is noted that the exact make-up of the proposed 'Farm Sustainability standards' and the underpinning requirements (replacing the current Verifiable Standards) has not yet been determined. Work is ongoing in this area and will

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<sup>13</sup> Raphaka K, Matika O, Sánchez-Molano E, et al. Genomic regions underlying susceptibility to bovine tuberculosis in Holstein-Friesian cattle. BMC genetics. 2017 Dec 1;18(1):27. doi: 10.1186/s12863-017-0493-7

<sup>14</sup> Tsairidou S, Woolliams JA, Allen AR, et al. Genomic prediction for tuberculosis resistance in dairy cattle. PLoS One. 2014 May 8;9(5):e96728. doi: 10.1371/journal.pone.0096728

<sup>15</sup> Bermingham ML, Bishop SC, Woolliams JA, et al. Genome-wide association study identifies novel loci associated with resistance to bovine tuberculosis. Heredity. 2014 May;112(5):543-51. doi: 10.1038/hdy.2013.137



be discussed in detail during focused discussions with stakeholders. Engagement with the veterinary profession on this matter is vital.

66. As noted above, Northern Ireland is still without a final published strategic framework for animal health and welfare policy. Furthermore, there is no strong statement on the direction for animal health and welfare within this framework document. Without a clear vision, it will be difficult to ascertain what the final form of Farm Sustainability Standards should look like.
67. As the standards and underpinning requirements have not been agreed we are unable to provide support, at this time, for a change of the status quo.
68. Moving forward, there is the opportunity to engage with the veterinary profession to improve upon the compliance regime. It should be predominantly based on outcome safeguards and done in a meaningful way. An outcomes approach should be utilised as a tool to drive continuous improvement of animal management and husbandry practices, thereby promoting high animal health and welfare.
69. A welfare-outcome-safeguards approach contributes to informed considerations of the advantages and disadvantages of different production systems. Thereby, assisting producers and consumers to consider how well a production system holistically meets all of an animal's health and welfare needs. 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.
70. Behavioural opportunities for animals can be a key differentiator between some assurance schemes,<sup>16</sup> 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.

## **Metrics, Monitoring and Evaluation**

71. We understand that this proposal is framed in terms of the four key outcomes of increased productivity, environmental sustainability, improved resilience, and an effective functioning supply chain. We would strongly support the incorporation of animal health and welfare data within the monitoring and evaluation of the framework.
72. Improved animal health outcomes benefit productivity through efficiency. Therefore, collecting animal health data can act as a useful proxy or supplement for productivity data. Improved health status, biosecurity and husbandry will also reduce disease risk, leading to a more financially resilient sector.
73. Research shows that "dealing effectively with endemic livestock diseases represents an opportunity to reduce emissions from the livestock sector, often without compromising productivity or farm economics."<sup>17</sup> Therefore, improving animal health data can act as a useful indicator for meeting environmental goals.
74. As the consultation document notes, a challenge will be to ensure that data collection will be meaningful to stakeholders. One way to make data collection more usable for farmers would be to clearly establish the link between improving animal health and increased productivity for the farmer and meeting the environmental aims of the Executive. This is because endemic disease control is a more tangible goal for farmers, with more direct benefits for the individual farmer. This is also a goal that would be built on the support of the existing vet-farmer relationship.

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<sup>16</sup> British Veterinary Association, BVA Position on Farm assurance schemes, 2017

<sup>17</sup> [https://www.climatechange.org.uk/media/2031/livestock\\_health\\_and\\_ghg.pdf](https://www.climatechange.org.uk/media/2031/livestock_health_and_ghg.pdf)

75. Collection of farm health data would also benefit national disease control efforts. Therefore, we support provision for farm-level health data to be shared and utilised nationally.
76. As a first step DAERA should engage directly with the veterinary profession and industry to establish what health data should be prioritised for collection as part of the baseline audit. BVA and our specialist divisions will be able to draw upon our experience co-designing the Animal Health and Welfare Pathway in England. BVA holds a seat on the Pathway steering group which is mapping out how farmers, vets and government will work together to deliver sustained improvement in animal health and welfare over time.
77. From Spring 2022 annual animal health and welfare reviews will take place in England. The Review is a fully funded vet visit, that farmers will receive on a yearly basis. Farmers' own vets will carry out diagnostic testing, collect data, and provide bespoke advice. The initial focus will be on improving disease prevention and controlling or eradicating an industry-agreed list of diseases in each species. The vet is primarily there to support the farmer, but the data collected will be shared centrally to give a better understanding of the health and welfare of England's national and regional herd and flock.
78. The specific data sources are being agreed between government, industry, and the veterinary profession on a sector-specific basis. From our involvement in the Pathway since 2018, it is apparent that there is significant variation in where the sectors are starting, and which data will need to be prioritised. There is also significant variation within sectors. However, a consistent theme across all sectors is that vets will be critical to utilising data to unlock health and welfare improvements.