

BVA and BVPA response to Defra consultation on proposed remote veterinary inspections in avian disease control zones, in England

October 2023

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 British Veterinary Poultry Association (BVPA) is an active non-territorial division of BVA. The objective of the BVPA is to further the knowledge of its members, who are drawn from academia, research, government, commerce and practice, by holding educational and technical meetings. The Association also offers objective science-based advice and comment on issues affecting its members and the poultry industry in general.
3. We welcome the opportunity to feed into Defra's consultation on proposed remote veterinary inspections in avian disease control zones in England.

Amending the Order

4. **To what extent do you agree (Option 1 or Option 2) or disagree (Baseline) that the Order should be amended to provide powers to permit remote inspections? (Question 9)**
 - Strongly agree
5. **If a change is made, do you consider the change should be limited to: Option 1 (slaughter only) or Option 2 (all types of pre-movement licence inspections)? (Question 10)**
 - Option 2 (all types of pre-movement licence inspections)

During a Highly Pathogenic Avian Influenza (HPAI) outbreak the amount of work asked of the private veterinary surgeon, to enable the poultry industry to continue to provide safe eggs and meat to the public, is markedly increased. This causes issues since the number of experienced poultry vets is limited, leading to very busy vets dealing with highly stressful situations and a high workload. This can increase risk of error and also takes its toll on the mental health of the veterinary professional.

BVPA worked with APHA to draw up the remote inspection trial, which included detailed guidelines for both farmers and official veterinarians. Provision was made to ensure all birds on the premises could be seen, with safeguarding measures put in place. These included a requirement for an initial in-person inspection for each catch period (lasting up to 7 days), for vets to have knowledge and familiarity with the site prior to performing the remote inspection, and for specific information to be included in the video. This trial proved highly successful.

Members of the UK poultry veterinary profession support the proposals to carry out remote (rather than physical) inspection of poultry prior to the birds moving. There are several reasons for this:

- For indicator species such as chickens and turkeys, the initial signs of Avian Influenza (AI) are a change in feed or water intake, followed by increased mortality rates. Moving from physical to remote monitoring of these parameters in appropriate circumstances would not be expected to greatly increase the risk of an incorrect diagnosis. In later stages, birds also show clinical signs such as reduced vocalisation, lethargy, recumbency; these signs can be easily seen and heard on a video.
- In person visits (especially during an AI outbreak) pose an increased risk for biosecurity breaches. The requirement to re-check a premises if catch and transport will be over multiple days also creates a heavy burden of work on the private vet surgeon and increases the risk associated with entering a premises.
- The increased work for private vets is very difficult to resource whilst maintaining strict biosecurity rules.
- When a private vet visits a farm in an AI zone, they are prohibited by APHA rules from visiting a farm in a lower risk zone or a free area for 72 hours (though APHA updated their internal guidance to only 24 hours downtime last season). This makes managing a poultry vet team very challenging in terms of ensuring that the day-to-day veterinary work continues along with the AI related inspections.
- Many poultry practices cover large geographical areas. Remote inspection would reduce the amount of driving required, plus its associated impact on the environment and vet welfare. It also increases efficiency, allowing vets more time per inspection and ensuring inspections are not rushed.
- The time-sensitive nature of inspections (only lasting 24 hours) require some inspections to be early in the morning or late at night. This is more easily and safely resourced via video link since vets are then not required to make long journeys out of hours.
- Video inspection allows increased flexibility to re-inspect birds where there are issues causing last minute changes to catching and transport plans.

We therefore support the proposal for remote inspections to be made available on a permanent basis. We are pleased to see that the suggested preferred option allows for an extended scope, since frequent inspection of breeding flocks prior to movement of hatching eggs posed a significant concern for many vets.

Conditions for permitting remote inspections

6. To what extent do you agree or disagree to the following statement? “Before permitting remote inspections to be used during a specific outbreak, government should consider the evidence for how the disease virus is behaving”. (Question 11)

- Neither agree nor disagree

It is unclear exactly what evidence the government would use to make a decision on how the virus is behaving, ie genomic, clinical behaviour, or transmission patterns. This statement could currently suggest that APHA would need to make a decision on remote inspections for every individual outbreak of AI, which could lead to confusion around the new legislation, making it harder for vets and keepers to implement. We would support APHA having the ability to take a risk-based approach and require physical visits where this is necessary.

7. To what extent do you agree or disagree with the following statement? “Before permitting remote inspections, government should consider the scale of outbreak and the consequential pressure on veterinary resources”. (Question 12)

- Neither agree nor disagree

We support APHA taking a risk-based approach and considering the scale of the outbreak. However, this statement suggests that APHA would need to make a decision on remote inspections for every individual outbreak of AI, which could lead to confusion around the new legislation, making it harder for vets and keepers to implement. We would welcome further clarity on when remote inspections would or would not be permitted, and support APHA having the ability to require physical visits where this is necessary.

8. To what extent do you agree or disagree with the following statement? “Before permitting remote inspections, government should be satisfied that such inspections do not significantly increase the risk of spread of disease”. (Question 13)

- Strongly agree

Limiting the spread of the disease, both between birds and to humans, is the ultimate aim of all measures introduced during an AI outbreak. Avian influenza can be spread by contaminated vehicles, clothing, footwear, equipment, and infected people, so limiting additional visits should support biosecurity controls. With the correct safeguards in place to ensure veterinary professionals have knowledge of the premises and continue to make regular physical visits, including to assess biosecurity measures, we believe the success of the recent trial will continue and remote inspections will be a useful tool. However, should evidence or suspicion arise that remote inspections are resulting in an increased risk of the spread of disease, Government should have the ability to require physical inspections.

9. To what extent do you agree or disagree with the following statement? “Government should be able to permit remote inspection during an outbreak”. (Question 14)

- Strongly agree

As detailed above, we strongly support the proposals to allow remote inspections during AI outbreaks.

Ability to decline remote inspections

10. To what extent do you agree or disagree with the following statement? “If remote inspection is permitted by government, the inspecting veterinarian who is required to make the attestation that disease is unlikely to be present should be able to decline a remote inspection in favour of a physical inspection”. (Question 15)

- Strongly agree

It is essential that veterinary professionals are able to use their clinical judgement to make a contextualised decision regarding inspecting a premises, based on their pre-existing knowledge of the premises, and conversations with the poultry keeper and all relevant stakeholders.

11. “To what extent do you agree or disagree with the following statement? If remote inspection is permitted by government, the keeper who is appointing a veterinary practice to undertake the visit should be able to decline a remote inspection in favour of a physical inspection”. (Question 16)

- Agree

Whilst poultry keepers should be encouraged to follow veterinary advice where possible, it is important to ensure they feel able to engage in the decision-making process for managing AI on their farm. An outbreak can be a stressful time and a lack of ability to contribute to the decision-making process could further heighten stress levels. It is likely that most veterinary professionals will prefer to conduct remote inspections and would have the right to refuse to visit a premises if a keeper does not support remote inspections. Keepers should have clear and justifiable reasons to request a physical exam when a remote exam is offered, and veterinarians should engage in a conversation with keepers to ensure the optimal approach.

12. To what extent do you agree or disagree to the following statement? “If remote inspection is permitted by government, that remote inspection should be mandatory (no discretion)” (Question 17)

- Strongly disagree

It is essential that veterinary professionals are able to use their clinical judgement to make a contextualised decision regarding inspecting a premises, based on risk assessments, the latest available evidence, and conversations with the poultry keeper and all relevant stakeholders.

Prior knowledge of the business

13. To what extent do you agree or disagree to the following statement? “The conducting veterinarian should have good recent knowledge of the business, including the premises, procedures, personnel and stock before conducting any remote inspection”. (Question 18)

- Strongly agree

It is important to ensure that remote inspections remain a valuable additional tool for use in specific situations but must not replace the physical monitoring and verification of animal welfare poultry vets currently undertake.

BVPA worked with APHA to draw up the remote inspection trial, which included detailed guidelines for both farmers and official veterinarians. Safeguarding measures included a requirement for an initial in-person inspection for each catch period (lasting up to 7 days), and only vets with knowledge and familiarity with the site being allowed to perform remote inspection. This trial proved highly successful, and the guidance should continue to be used.