

BVA response to Rural Affairs and Islands Committee's consultation on the Agriculture and Rural Communities (Scotland) Bill

23 November 2023

Introduction

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With nearly 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) BVA Scottish Branch represents 2350 members in Scotland, bringing together representatives of specialist and territorial divisions, government, academic institutions and research organisations in Scotland. The branch advises BVA on the consensus view of members in Scotland on Scottish and UK issues.
- 3) We welcome the opportunity to respond to the Rural Affairs and Islands Committee's consultation on the Agriculture and Rural Communities (Scotland) Bill.

Q1 - Do you think a framework bill is the right approach? yes/no/don't know – Please explain your reasons for this answer

- 4) Yes. Following the UK leaving the European Union, Scotland has the chance to shape its agricultural policy in a way that works best for the country. It is notable that this Bill appears to stick close to the EU Common Agricultural Policy (CAP) schemes that it seeks to replace which may present issues as the other devolved nations look to tailor their agricultural support to their own needs. There could be significant divergence between the nations of Great Britain and Northern Ireland which would create serious issues. Therefore, with the potential for significant change being influenced by many factors including the environment and the economy as well as the need to maintain some consistency across the rest of Great Britain and Northern Ireland, it is important that the Agriculture and Rural Communities (Scotland) Bill is flexible. Laying it as a framework bill will allow Scottish Ministers to tweak and improve the legislation in the face of the emerging challenges but also the potential opportunities outlined above.

Q2 - Does the Bill provide a clear foundation for future rural policy and support? yes/no/don't know – explain your reasons

- 5) Don't know. The Bill goes a long way to establishing a foundation for future rural policy and we are pleased to see more recognition has been given to animal health and welfare, given that increased focus on this area would underpin the wider aims of the vision provided in the document. However, we feel, there are some areas that need strengthening for it to deliver across the whole sector.
- 6) The involvement of the veterinary profession within any future agricultural policy will be vital to all aspects of policy development, review, and implementation. Veterinary surgeons provide preventive healthcare and treatment for livestock. They also carry out surveillance, boost productivity, advise on and adhere to the responsible use of medicines promoting good biosecurity and high animal health and welfare. It is disappointing to note that there is no explicit reference to the vet-farmer relationship at all in the Bill as it currently stands. The relationship between a farmer and their vet is paramount when it comes to any effort to improve animal health and welfare outcomes. Veterinary surgeons are uniquely placed to advise and influence sustainable animal husbandry practices at whole-system levels, safeguarding animal health and welfare and influencing future sustainable efficient livestock and food production. Furthermore, no cross-border 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). 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.
- 7) Therefore, we would need to see more detail on the part that vets will play in the Bill's implementation and monitoring to ensure that the vital relationship between vet and farmer within the wider farm team, incorporating farm advisors, is utilised to deliver across the whole sector.

Section 1 sets out ‘overarching objectives’ of agriculture policy.

They are—

- the adoption and use of sustainable and regenerative agricultural practices,
- the production of high-quality food,
- the facilitation of on-farm nature restoration, climate mitigation and adaptation, and
- enabling rural communities to thrive

Q3 - Do you think these are the right objectives? yes/no/don't know – explain your reasons; if you have answered ‘no’, please set out what other objectives should be set out in the Bill.

- 8) No. We agree with the existing overarching objectives, however, we believe there should be an additional objective on animal health and welfare included as part of the Bill. Animal health and welfare are interwoven with almost all social, economic, and environmental outcomes. It is welcome that they are considered alongside efforts to increase economic or environmental sustainability. Agriculture cannot be considered sustainable if it is achieved at an unacceptable cost to animal welfare. Correct management of animal agriculture can be a key component in protecting the environment and combating climate change. Through regenerative schemes and disease prevention, for example, changes in animal production and farming practices are necessary to increase efficiency of agriculture and mitigate negative environmental impacts. The people of Scotland and the rest of the UK expect animal welfare to be at the heart of food production and UK standards of animal welfare to be maintained.
- 9) The economic contribution of improved animal health has been noted by the Scottish Government. A Government report published in 2020 estimates that veterinary interventions save the economy between £100m and £154m per annum by controlling endemic disease, £135m per annum by preventing exotic disease incursions, and £96m per annum on maintaining food safety by controlling and minimising outbreaks of BSE, salmonella, campylobacter and E.coli O157¹
- 10) The importance of maintaining high animal welfare standards as we transition to more efficient and ecologically conscious agriculture systems cannot be overstated. We fail to see how a plan can produce “high quality food” without also having high standards of animal health and welfare. At the very least, we would like to see animal welfare included in one of the existing objectives if one is not created specifically to highlight its importance in the success of delivering the Bill.

Section 2 provides that Scottish Ministers must prepare a five-year ‘Rural Support Plan’ and Section 3 provides that certain matters must be considered when preparing or amending a rural support plan. These matters include

- The objectives set out in Section 1
- Proposals and policies in the climate change plan which relate to agriculture, forestry and rural land use,
- Any other statutory duty relating to agriculture or the environment, and
- Development of EU law and policy.

Q4 Do you think the requirement that Scottish Ministers must prepare a five-year rural support plan is the right approach? yes/no/don't know – explain your reasons

- 11) Yes. A five-year plan seems sensible as it strikes the balance between allowing enough time for actions to be meaningfully funded and progressed whilst the plans can also be reviewed and rewritten, where appropriate, in a timely manner that would not be available if the plans were mapped out to cover a ten-year period for example. However, we must be conscious that some farming initiatives take 5 years and possibly more. So, for farmers, some of their own on farm plans may not fit within this proposed window if a 5-year approach is agreed.

Q5 Do you agree with the matters to be considered when preparing or amending a rural support plan, as set out in section 3? yes/no/don't know – explain your reasons; if you have answered ‘no’, please set out what other matters you think should be considered by the Scottish Ministers when preparing or amending a rural support plan

- 12) No. Similar to our response to Question 3 we think there needs to be explicit reference to animal

¹ <https://www.gov.scot/publications/preliminary-economic-assessment-veterinary-professions-value-scotland/>

welfare in this section. When rural support plans are prepared or amended, animal welfare must be a key consideration to enable rural communities, which rely on crofting and extensive grazing, to survive and thrive, and for the social licence of Scottish farming to continue. If a plan improves the welfare of animals, then chances should be taken to replicate this across the sector where relevant. Equally if a new programme harms the welfare of animals, then this should be seen as a significant enough factor to warrant the plan being amended.

Q7 Do you agree with the purposes as set out in Schedule 1? yes/no/don't know – explain your reasons; if you have answered 'no', please set out what purposes you think should be set out in Schedule 1

13) Don't know. We agree with the purposes set out in Schedule 1, particularly the specific section on animal health and welfare and the commitment to support training and professional development around topics such as animal health and welfare. We suggest the training should include a particular emphasis on preventative medicine, biosecurity and sustainable use of medicines on farm. Although it is positive to see training incorporated into the Bill we would hope these objectives would be outcome based so progress can be measured. The inclusion of tangible outcomes will go a long way in tracking improvements and highlighting if the training is having the intended impact on the sector.

14) We must also highlight the importance of the vet-farmer relationship within the wider farming team once again. It cannot be overstated how vital a strong working relationship across the whole farming team is, supporting agriculture, food production and boosting the rural economy. We therefore would like to see explicit reference to this in the Bill.

Q8 Do you have any other comments on the provisions in Part 2?

15) No further comments.

Q10 Do you agree with the provisions on a Code of Practice on Sustainable and Regenerative Agriculture? yes/no/don't know – explain your reasons

16) Yes. Providing guidance on sustainable and regenerative agriculture is important to ensure consistency across Scotland. It is important that vets are one of the key stakeholders involved in the discussions around drafting the Code of Practice. As described above, veterinary surgeons are uniquely placed to advise and influence sustainable animal husbandry practices at whole-system levels, safeguarding animal health and welfare as well as human health and influencing future sustainable efficient livestock and food production.

Q11 Do you agree with the power – set out in section 7 – for the Scottish Ministers to make regulations about the guidance contained in a Code of Practice on Sustainable and Regenerative Agriculture? yes/no/don't know – explain your reasons

17) Yes. We agree with the regulations set out under section 7. It is important that the Scottish Parliament is able to scrutinise the guidance on a particular scheme and the guidance should also be published. Under 2b of section 7 “requiring regard to be had by particular persons to the guidance” we must once again stress the importance of involving vets in the decision-making process for the guidance and review of it.

Q12 Do you agree with the provisions around continuing professional development? yes/no/don't know – explain your reasons

18) Yes. We support the inclusion of provisions that focus on continuing professional development. Within the veterinary profession CPD is already well established, compulsory, and benefits the industry immensely so weaving this concept into the new Bill is a positive. Involving vets in the delivery of training could also go a long way to strengthening the important relationship between farmer and vet.

Q13 Is there anything missing from the Bill that you expected or wanted to see? You may wish to consider issues discussed in the Agriculture Bill consultation which are not explicitly referenced in the Bill.

19) We would just like to reiterate, as we did in our response to the Agriculture Bill consultation in December 2022, and in our answers to this consultation, the importance of the vet-farmer

relationship and the role of the vet in helping to deliver agricultural policy reform. Although the Bill can be interpreted as including vets in its description of “persons who provide relevant advice or services” we would expect explicit reference, or at least more attention given to vets and their role in helping to deliver the objectives of the Bill. The relationship between a farmer and their vet within the wider farming team is paramount when it comes to any effort to 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.

Q14 Is this Bill an appropriate replacement for the EU's CAP regime in Scotland? yes/no/don't know – explain your reasons

20) No. This Bill does do a great deal to map out an appropriate replacement for the EU's CAP regime in Scotland. However, our vision for post-Brexit agriculture policy puts animal health and welfare support as public goods at its centre. We are calling for public money to be used ambitiously, maximising its impact and incentivising innovation. Farming support should take into account cross-government priorities. An effective system will benefit other government policies. Within a future post-CAP agriculture policy, we welcome the use of grants or pilot schemes to trial the use of innovative technologies to improve animal health and welfare.

Q15 Are there any issues arising from the interaction of this Bill with other UK and Scottish legislation?

21) We support Scottish Government producing an agricultural plan that is tailored to the specific needs of the country. Devolved administrations have been able to shape agricultural policy within their respective jurisdictions but coordination and oversight on matters of animal health is crucial. With the various devolved governments taking forward their own agriculture policies it is vital that there is some semblance of cohesion in farming policy across Great Britain and Northern Ireland. As we mentioned above, this Bill does seem to align more closely with the outgoing CAP schemes than the agricultural policies of the UK, Welsh, and Northern Irish Governments. There will therefore need to be consideration where decisions on agricultural policy are taken, and how best to coordinate efforts across the nations of the UK.

Q16 Please use the text box below to set out any further comments you wish to make about the Bill.

22) Whilst we appreciate the significance of crofting in Scotland and the very real need to ensure it is supported, we think areas of intensive large scale animal farming should also feature more prominently in the Bill as a more significant amount of agricultural production does come from these farms in Scotland.