1. The British Veterinary Association (BVA), the Northern Ireland Veterinary Association (NIVA) and the Association of Veterinary Surgeons Practising in Northern Ireland (AVSPNI) welcome the opportunity to respond to this consultation.

2. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom and has over 13,000 members. Its primary aim is to protect and promote the interests of the veterinary profession in this country, and it therefore takes a keen interest in all issues affecting the veterinary profession, be they animal health, animal welfare, public health, regulatory issues or employment concerns.

3. Between them, NIVA and AVSPNI represent vets working in all areas of the profession in Northern Ireland, and as such are well placed to provide a consensus view on issues of concern to veterinary surgeons.

4. We have also consulted with colleagues from the British Cattle Veterinary Association and the Pig Veterinary Society, both specialist divisions of the BVA, as well as our Ethics and Welfare Group.

5. We are broadly supportive of the content of both the draft welfare codes, which are essentially sound, but wish to raise some points of correction and clarification detailed below.

6. **Welfare Code for Pigs:**

- **Clause 2.1** – states that the larger the size of the unit the greater the degree of skill and care needed to safeguard welfare. We believe that skill and care is needed to safeguard welfare at any unit, regardless of size. We believe it would be more appropriate and accurate in this paragraph to refer to the number of competent stock men required in relation to the size of the unit, rather than the level of stockman ship. This clause also lists a number of animal health and welfare related skills in which a stock keeper should be competent. We believe that on farm emergency slaughter should be included in this list of competencies.

- **Clause 2.2** – refers to minimising the use of electric goads. We believe that electric goads should not be used at all and they are in fact already prohibited under a number of farm assurance schemes.

- **Clause 3.1** – lists items to include in a written health and welfare plan. We believe that this list should also include references to salmonella control, vermin control and euthanasia procedures. The reference to the prevention and control of vices such as tail biting should also include ‘monitoring’.

- **Clause 3.3** – refers to good biosecurity. This section should also refer to the importance of vermin control.
• **Clause 3.8** – refers to the safe disposal of equipment used for vaccination/treatment. We believe this section should refer more explicitly to the requirements of the Department of the Environment for Northern Ireland for the disposal of pharmaceutical and sharps waste.

• **Clause 3.10** – This section refers to the Welfare of Animals (Slaughter or Killing) Regulations (Northern Ireland) 1996 (as amended) which have now been superseded by The Welfare of Animals at the Time of Killing Regulations 2012 (WATOK).

• **Clause 3.11** – refers to record-keeping for medicine use. This should also include a reference to withdrawal periods for food producing animals. This section also refers to conditions which relate to cows rather than pigs – MMA and pre-weaning scour would be more relevant examples.

• **Clause 4.3** – requires the stock keeper to avoid wide or abrupt fluctuations in temperature. We believe this would be better phrased ‘the stock keeper should make efforts to prevent or reduce wide fluctuations in temperature’

7. **Welfare Code for Dairy Cows**

• **Clause 2.0** – we believe it would be helpful to define ‘stock keeper’ and ‘stock handler’

• **Clause 2.1** – we support the reference to training which leads to formal recognition of competence. We believe this could go further and require ongoing CPD. This clause also states that a stock keeper should be expected to know when veterinary treatment is required. We believe this should be adjusted to state that a stock keeper should know when to seek veterinary advice. The reference to ‘a planned herd health programme’ should be ‘in consultation with a veterinary surgeon and regularly reviewed’

• **Clause 2.2** – we support the reference to Grandin for understanding flight zones

• **Clause 4.2** – the requirements for cubicle size should include some specific dimensions, and examples of appropriate bedding material should be provided

• **Clause 4.7** – refers to ventilation requirements. There is data available specifying minimum outlet per kg of cow

• **Clause 4.11** – contingency for prolonged sub zero temperatures should be included, including back-up power for milking

• **Clause 6.2** – the requirement for regular inspection needs a definition of regular, and will depend on the life stage of the animal

• **Clause 6.6** – the worming program should be devised ‘in consultation with a veterinary surgeon’

• **Clause 6.7** – the dosing gun should be maintained according to manufacturer’s instructions and calibrated before use

• **Clause 6.8** – isolation pens should have easy access to handling facilities for treatment purposes. This section also refers to the Welfare of Animals (Slaughter or Killing) Regulations (Northern Ireland) 1996 (as amended) which have now been superseded by The Welfare of Animals at the Time of Killing Regulations 2012 (WATOK). It could be helpful to clarify that emergency slaughter, by definition, should take place within 24 hrs.

• **Clause 6.9** – frequent turning of downer cows should specify ‘at least every two hours’

• **Clause 8.0** – calving aids should only be used by appropriately trained operatives

• **Clause 9.8** – we believe this section should include reference to the importance of good on farm biosecurity, purchasing protocols and on farm isolation procedures

• **Appendix A** – links to other useful sites should include BCVA’s Emergency Slaughter [http://www.bcva.eu/bcva/sites/default/files/ES%20Booklet%202010(2).pdf]

8. Given the short time allocated for developing this response, we would be happy to discuss any of the points above in more detail as necessary. As welfare codes are dynamic documents in need of ongoing review we would be keen to contribute to future drafts.