

# BVA Welsh Branch response to Sustainable Farming and our Land - Consultation Response

October 2019

## Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 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 and the wellbeing of the profession.
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.

## Key points

- We welcome and fully support the increased presence of animal health and welfare within this updated proposal, compared with the version consulted on previously.
- However, the weight given to animal health and welfare within the framework is insufficient given the high proportion of livestock farming in Wales. Animal health and welfare should be included as a benefit within the outcomes framework.
- In the current proposals, animal health and welfare standards are only listed as an outcome related to high competitiveness and economic resilience. Being listed as just one of nineteen outcomes does not show the importance of animal health and welfare. This also fails to recognise that animal health and welfare is interwoven with many social, economic and environmental outcomes. We support the Sustainable Land Management approach as a means to incentivise public goods. We welcome the use of a single system that recognizes the mutual benefits of economic, environmental, social and animal health and welfare outcomes.
- We support the outcomes-based approach that will underpin the SLM approach, However, this could be simplified and clarified. Greater clarity is needed to differentiate between the benefits and outcomes.
- The role of the veterinary surgeon is underutilised within the current plan. Vets are regarded as the most influential advisors to farmers within the decision-making process<sup>1</sup>. They should be included within the sustainable farming scheme to reflect this role as trusted advisors on animal health and welfare planning, husbandry, biosecurity, biocontainment and preventative medicine.

## Question 1 - Sustainable Land Management (refer to chapter 3)

### General views on the Sustainable Land Management framework

3. A new agricultural policy 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.
4. BVA supports the principle of public money for public goods. The public goods that will be rewarded by the new scheme must be clearly defined, be based on sound scientific evidence, and should benefit the country as a whole, whilst not having a negative impact on the economies and

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<sup>1</sup> Alarcon, P., Wieland, B., Mateus, A.L.P., Dewberry, C. 2014. Pig farmers' perceptions, attitudes, influences and management of information in the decision-making process for disease control, Preventive Veterinary Medicine, 116 (3): 223-242.

communities that deliver them. The “*sustainable land management outcomes*” in this proposal follow this principle, so we are broadly supportive of the overarching framework.

5. We are pleased that the proposals “*now explicitly recognise the interaction between food production and environmental outcomes*”. We were also pleased to read in 3.6. that “*In particular, the consultation exercise suggested the production of food and other economic goods and the production of environmental goods can be mutually reinforcing, not mutually exclusive.*” We therefore support the decision to utilise a single scheme and not the two schemes proposed previously.
6. However, we are disappointed that animal health and welfare is not prominent enough in the proposed scheme, and not sufficiently recognised as an important public good/Sustainable land management outcome. Although animal health and welfare is now included as a specific action contributing to economic resilience, the proposals do not 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 antimicrobial resistance (AMR) as an environmental benefit. An environmental benefit scheme on land where livestock is kept must include animal health and welfare. For example, a farm with serious sheep scab infection in the flock should not be receiving funding for an environmental scheme in the absence of a parallel programme to eradicate sheep scab.
7. Sustainable animal agriculture can be defined as animal agriculture<sup>2</sup> carried out in a way that meets the needs of the present without compromising the ability to meet the needs of the future. Sustainable animal agriculture should be undertaken in a way that is environmentally, ethically and economically acceptable for consumers, producers and wider society. As part of this, animal health and welfare should not be unnecessarily compromised to address human need and in order to be considered sustainable, agricultural systems must work towards the positive health and welfare of all farmed animals raised within them. BVA supports the [Farm Animal Welfare Committee \(FAWC\)'s principles for sustainable agriculture and animal welfare](#).
8. To be considered sustainable, agricultural systems must provide for the five animal welfare needs, positive health outcomes and adhere to [OIE standards for animal health and welfare](#), offering stimulating living environments to allow for the performance of highly motivated behaviours; opportunities for positive welfare outcomes, such as comfort, pleasure, interest and confidence; and excellent health outcomes. The BVA position on [Sustainable animal agriculture](#) provides more information. We believe that, 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 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.
9. Furthermore, recent research<sup>3</sup> 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. This research provides further evidence that UK ruminant agriculture can create positive Sustainable Land Management outcomes.
10. 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 law<sup>4</sup>, 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. We are disappointed that this is not sufficiently reflected in these proposals, in contrast to the plans for environmental actions within this document, and the ambitious system of public money for public goods that has been taken forward in England which explicitly lists animal health and animal welfare to receive financial support. We therefore believe that animal health and welfare must be recognised as an important outcome by any new agricultural payments scheme.

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<sup>2</sup> Where animal agriculture includes aquaculture and gamebirds

<sup>3</sup> Allen, MR, Shine, KP, Fuglestedt, JS, Millar, RJ, Cain, M, Frame, DJ, and Macey, AH (2018): A solution to the misrepresentations of CO<sub>2</sub>-equivalent emissions of short-lived climate pollutants under ambitious mitigation. *npj Climate and Atmospheric Science*, 1(1), 16. <https://doi.org/10.1038/s41612-018-0026-8>

<sup>4</sup> Lesley Griffiths, Cabinet Secretary for Energy, Planning and Rural Affairs, Written Statement - Animal Sentience, <https://gov.wales/about/cabinet/cabinetstatements/2018/animalsentience/?lang=en>

11. A new agricultural policy offers an opportunity to harmonise support to farms with other key Welsh, UK and international strategies. We would ask that animal health and welfare policy, legislation and strategies are given full consideration alongside these other factors.

### The structure of benefits, outcomes and actions

12. We understand the aim of the structure but are concerned that this has not been explained clearly. There is no differentiation between the 3 headline categories of benefits (on page 24): Economic, Environmental, and Social, and the 9 sub-categories of benefits (on page 25). The term “*Benefits*” is used for both lists, which causes a lack of clarity. We are unsure about the distinction between benefits and outcomes, since these are often very similar. For example, “*water quality*” is an outcome which leads to the benefit of “*high water quality*” with no explanation of the difference between the two. Conversely, “*animal health and welfare*” is an outcome linked to the benefit of “*high competitiveness*” which is a much less direct relationship. We believe the framework could be simplified to more clearly define its key aspects. Benefits and outcomes could be combined in one column, with the actions which contribute to them listed alongside. The [Northern Ireland Outcomes Delivery Plan](#) is a good example of a clear outcomes-based framework with outcomes to achieve and indicators to measure the achievement of those outcomes.
13. We support the outcomes based approach, as we believe that agreements within any scheme should be predominantly based on outcome safeguards which are done in a meaningful way. From an animal health and welfare point of view, it is not sufficient to carry out a tick-box exercise in terms of inputs. Evidence based 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<sup>5</sup>. For example, behavioural opportunity for animals can be a key differentiator between some assurance schemes, 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.
14. Prioritisation and measurement of outcomes must be based on sound, scientific evidence. An outcomes approach can be utilised as a tool to drive continuous improvement of animal management and husbandry practices, thereby promoting high animal health and welfare. A welfare outcome safeguards approach contributes to informed considerations of the advantages and disadvantages of different production systems, assisting producers and consumers to consider how well a production system holistically meets all of an animal’s health and welfare needs.

### The range of benefits and outcomes

15. We are pleased that the role of farmers is now formally recognised in the proposals, in favour of the term land manager used throughout the previous proposal. We recognise that the proposals need to cover a wide range of farmers, however permanent pasture grassland accounts for more than 75% of the land used for agriculture in Wales<sup>6</sup>, so we believe that a greater focus on management of animals is necessary.
16. In the current proposals, animal health and welfare standards are only listed as an outcome related to high competitiveness and economic resilience. Being listed as just one of nineteen outcomes does not show the importance of animal health and welfare. This also fails to recognise that animal health and welfare is interwoven with many social, economic and environmental outcomes, for example:
  - **Environmental:** There is a large body of evidence supporting the environmental benefits of various aspects of livestock farming in Wales<sup>7,8,9,10,11</sup>. These include carbon sequestration in

<sup>5</sup> Farm Animal Welfare Committee (FAWC) (2009). Farm Animal Welfare in Great Britain: Past, Present and Future. FAWC

<sup>6</sup> The Farming Sector in Wales Research Briefing (2018) <https://www.assembly.wales/Research%20Documents/18-057%20-%20Farming%20in%20Wales/Farming%20in%20Wales-Web-English.pdf>

<sup>7</sup> 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](https://www.climateexchange.org.uk/media/2031/livestock_health_and_ghg.pdf)

<sup>8</sup> 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

<sup>9</sup> 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>

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

<sup>11</sup> Pol-van Dassel, 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](https://ec.europa.eu/eip/agriculture/sites/agri-eip/files/eip-agri_fg_grazing_for_carbon_final_report_2018_en.pdfX)

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. Recent research<sup>12</sup> 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 outcomes.

- **Social:** 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. Disease outbreaks and the measures to control them can carry costly consequences for both public health and rural communities. For example, the Foot and Mouth outbreak in 2001 damaged the lives of farmers and rural communities across the UK and caused a general election to be postponed. The vital role of farmers in protecting the public health of the nation and overseas consumers has been under-emphasised within the scheme.
  - **Economic:** The proposals currently recognise the importance of animal health and welfare with regard to competitiveness and productivity. High standards of animal health and welfare also help to reduce the economic risks associated with disease outbreaks. Disease outbreaks and the measures to control them can carry wide and costly consequences for the economy. These impacts are substantial; across the UK, the Foot and Mouth outbreak in 2001 is estimated to have cost £5 billion to the private sector and £3 billion to the public sector. High and improving animal health and welfare standards can also have other economic benefits, such as adding value to 'Brand Wales'. There are concerns that, since high standards of animal health and welfare may reduce competitiveness against cheaper imported foreign meat products, its economic benefits may not be recognised if it is only included under "*High Competitiveness*".
17. Although it is listed as an outcome in Annex B, the proposals do not sufficiently focus on animal health and welfare as an outcome. Some have noted that achieving good animal welfare is not always advanced as a policy objective in the sustainable development agenda, despite a growing moral imperative to do so and the utility value of healthy and happy animals in helping to achieve the UN Sustainable Development Goals. We recognise it as an important public good, and believe it is not sufficient to simply combine it within the existing streams.
18. We propose that a fourth stream of main benefits be added to the list on page 24, so that animal health and welfare is on the same level as environmental, social and economic outcomes. This would recognise that high animal welfare and food safety standards are the foundations underpinning consumer confidence in Welsh produce.

### Focusing an income stream on environmental outcomes

19. As a health-centred profession and key stakeholder in the One Health agenda, the veterinary profession recognises that policies relating to sustainable animal agriculture must 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 ecological footprint of animal agriculture as a whole.
20. We support an income stream which focuses on environmental outcomes, provided that animal health and welfare is properly recognised as a key sustainability objective within that stream. The proposal does not sufficiently recognise the positive environmental outcomes that can be achieved through good animal health and welfare
21. Diversification can sometimes have negative consequences for animal health and animal welfare, and diversification schemes may compete with current animal health and welfare outcomes (for example, improved access for dog walkers also creates an increased biosecurity risk and could increase the transmission of diseases such as bovine TB, sheep scab, hydatid disease and neosporosis). All these consequences should always be considered carefully. Where outcomes are

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<sup>12</sup> Allen, MR, Shine, KP, Fuglestedt, JS, Millar, RJ, Cain, M, Frame, DJ, and Macey, AH (2018): A solution to the misrepresentations of CO<sub>2</sub>-equivalent emissions of short-lived climate pollutants under ambitious mitigation. *npj Climate and Atmospheric Science*, 1(1), 16. <https://doi.org/10.1038/s41612-018-0026-8>

competing with each other, it is important that no outcome should be rewarded that decreases animal health or welfare standards on a farm from the existing situation.

22. 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>13</sup>
23. It may be that some environmental outcomes, e.g. carbon sequestration, can be achieved more quickly by some methods than others. For example, livestock grazing pasture has enormous potential as a valuable carbon sink and that can be realised much faster than the planting of broad-leaved trees. Which of these methods are used should be based on scientific evidence with full impact assessment performed including consequences to animal health and welfare<sup>14</sup>.
24. We are concerned that, according to figure 3.5 on page 28 of the consultation document, only environmental outcomes will be eligible for ongoing financial support. With animal health and welfare currently only being listed as an outcome only under the economic stream, we are concerned that farmers will not receive incentives to continue progressing this. Under the “*range of benefits and outcomes*” heading above, we have proposed that animal health and welfare be added as an additional stream. This should be eligible for ongoing financial support where improvement continues to be made. The relative weighting of animal welfare throughout the document seems disproportionately low compared with current societal beliefs around animal welfare widely held within the UK.

#### Disease and the environment

25. As mentioned previously, disease outbreaks and the measures to control them can carry wide and costly consequences for public health, the economy and the environment. These impacts are substantial; across the UK, the Foot and Mouth outbreak in 2001 is estimated to have cost £5 billion to the private sector and £3 billion to the public sector, damaged the lives of farmers and rural communities and caused a general election to be postponed<sup>15</sup>.
26. Reduction in inefficiency through disease control offers significant opportunities to benefit the environment. If disease is no longer present then productivity and feed conversion efficiency will increase, while greenhouse gas production and wastage will be reduced<sup>16</sup>. Disease requires treatment, and this is commonly through antimicrobials to deal with the pathogen or secondary infections as a result of the primary pathogen. Disease eradication will reduce the need for treatment on farm – further reducing costs – and meeting a need to deal with AMR through the reduction in use on farms.
27. There is a large body of evidence showing that improving animal health and animal welfare concurrently benefits environmental public goods for example by reduction of greenhouse house emissions through increased efficiency of production<sup>17,18,19,20,21</sup>. The graph below illustrates the use of evidence-based outcomes by measuring the relative **reduction** of greenhouse gas emissions that can be achieved by controlling each endemic disease of cattle.

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<sup>13</sup> FAO, 2017. Sustainable agriculture for biodiversity: Biodiversity for sustainable agriculture. Available at: <http://www.fao.org/3/a-i6602e.pdf>

<sup>14</sup> 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.pdf](https://ec.europa.eu/eip/agriculture/sites/agri-eip/files/eip-agri_fg_grazing_for_carbon_final_report_2018_en.pdf)

<sup>15</sup> National Audit Office (2002), The 2001 Outbreak of Foot and Mouth Disease

<sup>16</sup> ADAS UK Ltd, 2015. Study to Model the Impact of Controlling Endemic Cattle Diseases and Conditions on National Cattle Productivity, Agricultural Performance and Greenhouse Gas Emissions. Report prepared for Defra/AHVLA.

[http://randd.defra.gov.uk/Document.aspx?Document=13320\\_AC0120Finalreport.pdfX](http://randd.defra.gov.uk/Document.aspx?Document=13320_AC0120Finalreport.pdfX)

<sup>17</sup> Skuce et al. 2016. Livestock Health & Greenhouse Gas Emissions. ClimateXchange, Scotland's Centre of Expertise on Climate Change. [https://www.climatechange.org.uk/media/2031/livestock\\_health\\_and\\_ghg.pdf](https://www.climatechange.org.uk/media/2031/livestock_health_and_ghg.pdf)

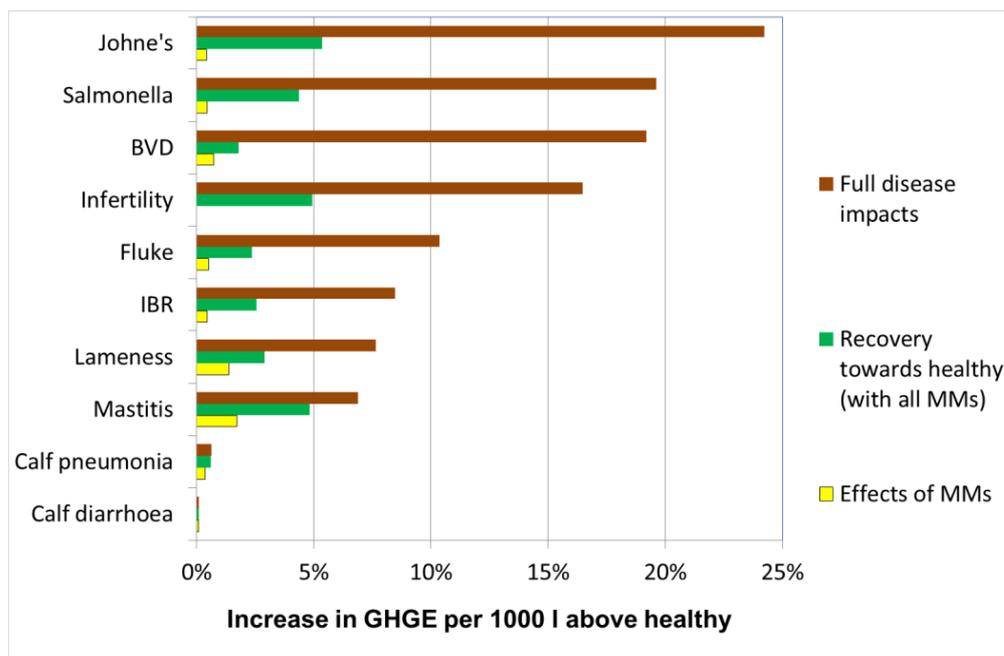
<sup>18</sup> Llonch et al. 2017. Current available strategies to mitigate greenhouse gas emissions in livestock systems: an animal welfare perspective. *Animal*. 2017 Feb;11(2):274-284. doi: 10.1017/S1751731116001440

<sup>19</sup> 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>

<sup>20</sup> Statham, J. et al. 2017. Climate change and cattle farming. *In Practice* 39.1: 10-19.

<sup>21</sup> 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](https://ec.europa.eu/eip/agriculture/sites/agri-eip/files/eip-agri_fg_grazing_for_carbon_final_report_2018_en.pdfX)



**Graph Showing Effects of conditions and treatments on GHG emissions from milk production<sup>22</sup>.**

28. The graph shows us, for example, that BVD eradication (which we are well on the way towards achieving in Wales through the Gwaredu BVD programme) will yield a 14% reduction in greenhouse gas emissions in dairy cattle. This is an example of a measurable outcome of a long-term project delivering concurrent environmental and animal health and welfare public goods. This process could be repeated for all endemic diseases of all livestock species. Furthermore, recent research<sup>23</sup> 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. This 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 outcomes.
29. The continuous monitoring of new and emerging disease through data collection, analysis and sharing across species provides 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. Official statistics put the value of UK livestock outputs at £12.7 billion<sup>24</sup>, and the value of UK aquaculture outputs at £0.59 billion<sup>25</sup>. A robust surveillance system is integral to the realisation of these high-value outputs.
30. BVA has produced a detailed policy position on veterinary scanning surveillance which outlines our vision for animal health and disease monitoring post-Brexit<sup>26</sup>. The development of a new agriculture policy presents an opportunity to modernise and optimise our animal health and disease monitoring networks. This can be achieved through:

<sup>22</sup> Graph taken from ADAS UK Ltd, 2015. Study to Model the Impact of Controlling Endemic Cattle Diseases and Conditions on National Cattle Productivity, Agricultural Performance and Greenhouse Gas Emissions. Report prepared for Defra/AHVLA. [http://randd.defra.gov.uk/Document.aspx?Document=13320\\_AC0120Finalreport.pdf](http://randd.defra.gov.uk/Document.aspx?Document=13320_AC0120Finalreport.pdf)

<sup>23</sup> Allen, MR, Shine, KP, Fuglestedt, JS, Millar, RJ, Cain, M, Frame, DJ, and Macey, AH (2018): A solution to the misrepresentations of CO2 -equivalent emissions of short-lived climate pollutants under ambitious mitigation. *npj Climate and Atmospheric Science*, 1(1), 16. <https://doi.org/10.1038/s41612-018-0026-8>

<sup>24</sup> Defra, DAERA, Welsh Government, Scottish Government (2017), *Agriculture in the United Kingdom 2016*

<sup>25</sup> Centre for Environment, Fisheries and Aquaculture Science, 2012. *Aquaculture statistics for the UK, with a focus on England and Wales*. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/405469/Aquaculture\\_Statistics\\_UK\\_2012.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/405469/Aquaculture_Statistics_UK_2012.pdf)

<sup>26</sup> British Veterinary Association (2018), [Position on veterinary scanning surveillance \(animal health and disease monitoring\)](#)

- Maintaining the current level of Government resource spent on the scanning surveillance network
- Adopting new approaches to data collection and feedback
- Optimising appropriate skills and expertise
- Rethinking traditional approaches to funding and coordination
- Articulating the value of surveillance reporting to the veterinary profession and other stakeholders through education to increase awareness and participation
- Working collaboratively with stakeholders to explore innovative communication strategies
- The establishment of a body to oversee and co-ordinate surveillance policy across the four administrations of the UK.

## Question 2 - Sustainable Farming Scheme (refer to chapter 4)

### Our views on the proposed Sustainable Farming Scheme

31. We are broadly supportive of the proposals but have some concerns regarding its delivery.

#### Farm advisers

32. We support the proposal to have farm advisers conduct the initial review of farms wishing to enter the scheme. We note that it will be important to ensure they receive sufficient remuneration and that there is an adequate workforce to manage all applications for the scheme.
33. We are concerned that in some cases farm advisers will need to make decisions based on competing priorities, for example environmental versus animal health, and that their decision may be affected by their personal interests and knowledge. Assessment of a farming enterprise and the environmental context of its operations will require considerable expertise which is unlikely to be met by any one person.
34. A potential solution would be to have a team of relevant assessors carry out the review of the enterprise with a single coordinator overseeing the process. This will allow for a joined-up approach and enable conflicting interests to be independently resolved. A mechanism for resolving such conflicts should also be developed.
35. As their most trusted adviser, a farmer's private vet should be included in the initial review stage. As animal health and welfare specialists and advocates from farm to fork, the veterinary profession is well-placed to advise and influence sustainable animal husbandry practices at whole system levels; safeguarding animal health and welfare whilst at the same time facilitating production efficiency and environmental protection.
36. Many of our members' roles in Wales are interlinked with those of farmers. The veterinary profession is an integral part of the agricultural and food sector, working collaboratively with others to protect animals, people and the environment they share. Veterinary surgeons provide preventive healthcare and treatment for livestock, as well as carry out health monitoring and disease surveillance, promote good biosecurity, promote high animal health and welfare, undertake research and development, and optimise food productivity and sustainability<sup>27</sup>. Further, veterinary surgeons have the expertise to advise on improvement through their experience in upholding necessary legislation and international standards of animal welfare, food safety, accurate certification and traceability. By carrying out surveillance and enforcement from farm to fork, Official Veterinarians (OVs) certify the trade in animals and animal products thus contributing to economic prosperity, the protection of public health (including from zoonotic disease incursion and antimicrobial resistance) and the sustainability of food production.

#### Delivering the Farm Sustainability Review and Farm Sustainability Plan

37. We support a comprehensive and tailored assessment for the farm sustainability review, rather than a light-touch approach. Any proposed scheme that potentially affects livestock and food production methods must have a detailed impact assessment carried out. Failure to recognise and protect

<sup>27</sup> British Veterinary Association (2018), [Position on veterinary scanning surveillance \(animal health and disease monitoring\)](#)

animal health and animal welfare as important SLM outcomes could have serious implications, including on public health. Assessments should include, disease surveillance and biosecurity, the transmission of zoonotic and food-borne diseases, the continued availability of vital veterinary medicines, food safety and consumer confidence.

38. We believe that a collaborative, industry-led approach will be the most effective way to deliver the Farm Sustainability Review and Plan. The veterinary profession has a key role to play in ensuring that the highest standards of health and welfare for production animals are maintained and recognised as a key sustainability objective, and should therefore be involved in the process.
39. We welcome the proposal to include “*having an animal health and welfare plan, if the farm has livestock*” as a mandatory element of the farm sustainability plan, and the recognition that this is an action “*fundamental to sustainability*”. High standards of animal health and welfare must be a key factor of the eligibility criteria for any farmers responsible for animals who wish to enter the scheme.
40. Sustainable animal agriculture should be undertaken in a way that is environmentally, ethically and economically acceptable for consumers, producers and wider society. As part of this, animal health and welfare should not be unnecessarily compromised to address human need and in order to be considered sustainable, agricultural systems must work towards the positive health and welfare of all farmed animals raised within them. BVA supports the Farm Animal Welfare Committee (FAWC)’s principles for sustainable agriculture and animal welfare<sup>28</sup>:

**Animal welfare is integral to sustainable agriculture:**

- i. Agriculture cannot be considered sustainable if it is achieved at an unacceptable cost to animal welfare.
  - ii. Sustainable agriculture must take account of the fact that farmed animals are sentient individuals.
  - iii. Sustainable agriculture must include a duty of care for the physical and mental needs and natures of farmed animals, and should not depend on prolonged or routine use of pharmaceuticals, or on mutilations.
41. Approaches to, and policies on, sustainable animal agriculture must ensure that farm animals have a good life and a humane death. To be considered sustainable, production systems should work towards positive health outcomes, the five animal welfare needs<sup>29</sup> and adhere to [OIE standards for animal health and welfare](#), offering stimulating living environments to allow for the performance of highly motivated behaviours; opportunities for positive welfare outcomes, such as comfort, pleasure, interest and confidence; and excellent health outcomes.<sup>30</sup> These five animal welfare needs are set out in the UK Animal Welfare Acts as:
    - The need for a suitable environment
    - The need for a suitable diet
    - The need to be able to exhibit normal behaviour patterns
    - The need to be housed with, or apart from, other animals
    - The need to be protected from pain, suffering, injury and disease
  42. To avoid oversimplification when considering how different production systems address animal health and welfare needs, animal health and welfare outcome assessments should form part of production system key performance indicators.
  43. In the report *Brexit and the Veterinary Profession*, BVA proposed a new animal welfare stewardship programme<sup>31</sup>. This call is in line with the Farm Animal Welfare Committee (FAWC)<sup>32</sup> and the Veterinary Development Council<sup>33</sup> recommendations that the UK governments should work with industry to actively protect animal health and welfare and that this should include consideration of a

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<sup>28</sup> Farm Animal Welfare Committee (FAWC), 2016. *Sustainable agriculture and animal welfare*. Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/593479/Advice\\_about\\_sustainable\\_agriculture\\_and\\_farm\\_animal\\_welfare\\_-\\_final\\_2016.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/593479/Advice_about_sustainable_agriculture_and_farm_animal_welfare_-_final_2016.pdf)

<sup>29</sup> Animal Welfare Act 2006, Animal Health and Welfare (Scotland) Act 2006, Welfare of Animals Act (Northern Ireland) 2011

<sup>30</sup> Farm Animal Welfare Committee (FAWC), 2009. “Farm Animal Welfare in Great Britain: Past, Present and Future”. Available at: <https://www.gov.uk/government/publications/fawc-report-on-farm-animal-welfare-in-great-britain-past-present-and-future>

<sup>31</sup> British Veterinary Association, *Brexit and the Veterinary Profession* (2017) [https://www.bva.co.uk/uploadedFiles/Content/News\\_campaigns\\_and\\_policies/Policies/Future\\_of\\_the\\_profession/brexit-and-veterinary-profession-v.1.0.pdf](https://www.bva.co.uk/uploadedFiles/Content/News_campaigns_and_policies/Policies/Future_of_the_profession/brexit-and-veterinary-profession-v.1.0.pdf)

<sup>32</sup> FAWC (previously the Farm Animal Welfare Council), *Economics and Farm Animal Welfare*, 2011

<sup>33</sup> Veterinary Development Council, *The Veterinary Development Council Report 2011–2012*, 2012

farm animal welfare stewardship programme. Such a scheme, focussed on health and welfare that is evidence-based and with welfare outcome safeguards, would use financial support for animal welfare as a public good, as has been the case for environmental stewardship. In 2014, the FAWC set out a proposed approach to developing such a stewardship programme starting with limited trials in each of the main livestock sectors<sup>34</sup>

44. We would recommend recognising participation in a farm assurance scheme within the farm sustainability review and farm sustainability plan, as part of an “*earned recognition*” system. Farm assurance schemes allow producers to demonstrate that their food products, both animal and non-animal derived, have met specific, independently certified standards at each stage of the supply chain from farm to fork. These standards include, but are not limited to, animal health and welfare, food safety, stockmanship training and competencies and environmental protection. Read more in [our position on farm assurance schemes](#). Recognising the importance of farm assurance schemes could help to reduce the time and expertise required to create a farm sustainability review.
45. It is vital that current schemes and good practice, including farm assurance and disease eradication schemes can be rewarded and included in the delivery of the farm sustainability plan, thus ensuring that the duplication of effort is avoided. This in turn will ensure the most efficient use of the funding available to deliver the scheme.

### Rewarding farmers for outcomes

46. We support rewards being provided in return for delivery of outcomes above and beyond the requirements of regulation. This contrasts with the current scheme, whereby agricultural support is provided as long as animal health and welfare standards meet the regulations. The new scheme should reward improvements in animal health and welfare, with baseline legislative requirements being the starting point. It will also be important to ensure that, if legislative requirements increase after an agreement has been signed, farmers continue to receive the financial incentives they have been promised. The potential withdrawal of support due to legislative change could act as a deterrent for other farmers considering the scheme.
47. The decision of which outcomes are to be rewarded should be evidence-based and should not be detrimental to the rural economies and communities that are being asked to deliver them. They should also be measurable through objective, accurate and direct assessments.
48. BVA recognises that from an animal health and welfare point of view, it is not sufficient to carry out a tick-box exercise in terms of inputs. BVA supports welfare outcome assessment in assurance schemes as a tool to drive continuous improvement of animal management and husbandry practices (including welfare at slaughter and food hygiene), in turn promoting high animal health and welfare. The standardised assessment of welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct picture of animal welfare. Indicators of positive welfare should be incorporated into welfare outcome assessments whenever possible, as promoted by the Farm Animal Welfare Committee (FAWC)’s “good life” framework<sup>35</sup>. Behavioural opportunity for animals can be a key differentiator between some production systems, which is linked to the potential for good animal health and welfare when delivered with excellent health and welfare outcomes. A welfare outcomes approach also contributes to informed considerations of the advantages and disadvantages of different production systems, assisting producers and consumers to consider how well a production system holistically meets all of an animal’s health and welfare needs.
49. We would welcome the further development of animal welfare metrics across species and sectors where they do not currently exist so that indicators of positive welfare, emotional and behavioural states are incorporated into welfare outcomes assessment and lifetime welfare assessment where possible. In the context of sustainable intensification<sup>36,37</sup>, it is important to avoid oversimplification

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<sup>34</sup> FAWC, An Animal Health and Welfare Stewardship Programme 2014

<sup>35</sup> Farm Animal Welfare Committee (FAWC), 2009. “Farm Animal Welfare in Great Britain: Past, Present and Future”. Available at: <https://www.gov.uk/government/publications/fawc-report-on-farm-animal-welfare-in-great-britain-past-present-and-future>

<sup>36</sup> Sustainable intensification is defined in the Government Office for Science (2011) The Future of Food and Farming: Challenges and choices for global sustainability report as “...simultaneously raising yields, increasing the efficiency with which inputs are used and reducing the negative environmental effects of food production. It requires economic and social changes to recognise the multiple outputs required of land managers, farmers and other food producers, and a redirection of research to address a more complex set of goals than just increasing yield.”

<sup>37</sup> Farm Animal Welfare Committee (FAWC), 2012. FAWC advice on sustainable intensification of livestock agriculture. Available at: <https://www.gov.uk/government/publications/fawc-advice-on-sustainable-intensification-of-livestock-agriculture>

when considering how different production systems address animal health and welfare needs and recognise that welfare outcomes are not solely dependent on the type or size of different production systems. As such, animal health and welfare outcome assessments should form part of production system key performance indicators and the Government should utilise public money to incentivise and support animal health and welfare outcomes as public goods.

50. Priority should be given to incentivising knowledge exchange, innovation, technology and new processes which can support animal health and welfare whilst optimising risk management, productivity and competitiveness.
51. We would welcome the use of grants or pilot schemes to trial the use of innovative technologies to improve animal health and welfare outcomes within a new agricultural policy. We recognise the role of new technologies and innovative methods in monitoring animal health and welfare outcomes, addressing animal health and welfare conditions and optimising the contribution of each animal to agriculture systems such as Precision Livestock Farming<sup>38</sup>. However, new technologies and innovative whole farm management models used to improve the contribution of animals, be that in terms of the production of food, animal feed or environmental goods, must not compromise the welfare needs of the animals in question.
52. As animal health and welfare specialists, the veterinary profession is well-placed to advise on appropriate animal health and welfare outcomes. BVA would be pleased to assist the Welsh Government in deciding what measurable outcomes would be appropriate for animal health and welfare, and how best to assess these outcomes.

#### Business support to be offered to farmers

53. We recognise the specific need to ensure economic resilience in the Welsh agricultural sector. Farming is the cornerstone of the £6.9 billion Welsh food and drink supply chain industry and represents over 58,000 jobs<sup>39</sup>, yet only 7% of Welsh land is defined as good or excellent quality<sup>40</sup>, making it difficult to drive a profit from the land. We support Welsh Government's concept of supporting the economic resilience of Welsh agriculture by offering business support to farmers, thus supporting rural economies and rural communities, whilst also rewarding public goods.
54. Investment in measures which make achieving desirable outcomes and compliance with basic standards easier would be beneficial. For example, investment in a well-conceived, collaborative, industry-led programme of disease eradication which farmers can easily follow has the potential to positively impact many areas of concern, including animal health and welfare, AMR, productivity and carbon usage. The veterinary profession is best placed to deliver such schemes, with excellent communication systems already in place between government vets, veterinary delivery partners, vets on farms and farmers themselves. There are existing programmes which have demonstrated this to be a well-received and effective approach in Wales, for example:
  - [Gwaredu BVD](#) is a national programme which tests young stock to identify herds that have BVD present on farm and support these in order to remove the infected animals. All cattle farms in Wales are eligible to be part of the project irrespective of size or farming system, and over 50% of all farms have already been tested, within the first year of the scheme operating. Enrolled farms are spread all across Wales. In addition, 200 farms to date are working on dealing with the disease and will reap the benefits of improved animal health and welfare as well as reduced usage of antimicrobials, and many more will do so going forwards. The Gwaredu BVD scheme is a great example of utilising the relationship between farmers and their own vets to deliver positive outcomes efficiently. It is a good example of how the use of Rural Development Programme funding has yielded cost effective results and is also a good example of an industry led approach to disease eradication.
  - [Cymorth TB](#) links farmers, OVs and government vets and has been a good example of collaborative working since 2015. Official Veterinarians (OVs) are upskilled through a training package which leads to an OCQ(V)-Cymorth TB qualification, facilitating the

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<sup>38</sup> Precision Livestock Farming is the creation of 'a management system based on continuous automatic real-time monitoring and control of production/reproduction, animal health and welfare, and the environmental impact of livestock production'. Berkman, D., 2014 Precision livestock farming technologies for welfare management in intensive livestock systems. Rev. sci. tech. Off. int. Epiz., 2014, 33

(1), 189-196. Available at: <https://www.oie.int/doc/ged/D13666.PDF>

<sup>39</sup> <https://www.nfu-cymru.org.uk/campaigns/back-welsh-farming/>

<sup>40</sup> <https://beta.gov.wales/agricultural-land-classification-predictive-map>

provision of a comprehensive approach to the management of TB breakdowns, including a high level of support to farmers under restriction, minimising the impact of the breakdown. OVs have indicated that being part of Cymorth TB has enhanced their knowledge and the value they can offer as key players in the eradication of TB. This scheme has recently become opt-out to increase uptake.

- The [Farming Connect](#) scheme is another great example of how vets can help deliver positive benefits on farms. Their training courses have utilised vets to deliver knowledge and skills transfer, for example in lambing techniques, improved livestock handling and the correct use of veterinary medicines. Their small capital grants scheme has proved successful, for example providing;
    - veterinary diagnostic testing such as faecal egg counts, helping to slow down the development of anthelmintic resistance
    - improved handling facilities, which can improve the accuracy and safety of TB testing
    - Electronic Identification readers and software for sheep farmers, improving traceability and surveillance capacity.
55. Members of the veterinary profession could be key to encouraging a collaborative approach, initiating local schemes, providing advice, designing programmes and conducting research in a local area. The veterinary profession is an integral part of the agricultural and food sector, working collaboratively with others to protect animals, people and the environment they share. Veterinary surgeons provide preventive healthcare and treatment for livestock, as well as carry out health monitoring and disease surveillance, promote good biosecurity, promote high animal health and welfare, undertake research and development, and optimise food productivity and sustainability. Further, veterinary surgeons uphold necessary legislation and international standards of animal welfare, food safety, accurate certification and traceability. By carrying out surveillance and enforcement from farm to fork, Official Veterinarians (OVs) certify the trade in animals and animal products thus contributing to economic prosperity, the protection of public health (including from zoonotic disease incursion and antimicrobial resistance) and the sustainability of food production.

### Eligibility criteria

56. Whilst we recognise that foresters and farmers have a role to play in sustainable land management, we are concerned that broadening the scheme could be detrimental to the farming community. Given that only 60 percent of land packages in Wales that could be eligible for the schemes currently receive direct payments, whatever funding is available following EU exit is likely to be distributed across a higher number of land-owners, reducing the amount available per farmer.
57. It is important that funding from the UK government is ring fenced for Welsh agriculture and is used for the benefit of Welsh farming. The ambition must be to enhance our already high standards of animal health and animal welfare, in order to increase productivity and efficiency and economic resilience. There is strong evidence that this will also provide environmental benefits. The veterinary profession should be at the heart of helping farmers to realise this ambition.
58. Whilst the old CAP scheme of Single Farm Payments had some disadvantages, one advantage was that it was relatively cheap to administer. The implementation of the new proposal must be costed out and its viability considered when the amount of funding available becomes known.

### Private finance

59. Where private investment into schemes is considered, there needs to be veterinary input regarding the safeguarding of animal health, animal welfare and public health, which should be prioritised.

### Capped payments

60. The scheme should reward active farmers who play a vital role in livestock production, environmental management and local economies, communities and employment opportunities. If the funding is going to be apportioned depending on land area of the farm, then capping of payments could be a necessary way of avoiding a large proportion of funding going to wealthy individuals and organisations who are not active farmers but own large land areas. The aim of the scheme should be

for funding to reach where it is likely to do the most good. For example, more availability of funding for new agricultural entrants including young people and tenant farmers.

### Question 3 - Advisory service (refer to chapter 5)

#### Establishing an advisory service

61. We support the proposal to create an advisory service, since knowledge transfer initiatives have been shown to be effective in Wales. For example, the [Farming Connect](#) scheme training courses have utilised vets to deliver knowledge and skills transfer, including in lambing techniques, improved livestock handling and the correct use of veterinary medicines. Their small capital grants scheme has proved successful, for example providing;
- veterinary diagnostic testing such as faecal egg counts, helping to slow down the development of anthelmintic resistance.
  - improved animal handling facilities – benefits include improved safety management and facilitation of safer and consistent quality of the bovine TB skin test.
  - Electronic Identification readers and software for sheep farmers, improving traceability and surveillance capacity.
62. Improvements in areas such as animal health and welfare standards, responsible use of medicines, biosecurity and production efficiency need to be achieved through increased knowledge and skills transfer to farmers and those who care for livestock. Veterinary surgeons who are on farm and have a deep understanding of local factors are well placed to deliver these objectives.

#### Farm advisers

63. We support the proposal to have farm advisers conduct the initial review of farms wishing to enter the scheme. We note that it will be important to ensure they receive sufficient remuneration and that there is an adequate workforce to manage all applications for the scheme.
64. We are concerned that in some cases farm advisers will need to make decisions based on competing priorities, for example environmental versus animal health, and that their decision may be affected by their personal interests and knowledge. Assessment of a farming enterprise and the environmental context of its operations will require considerable expertise which is unlikely to be met by any one person.
65. A potential solution would be to have a team of relevant assessors carry out the review of the enterprise with a single coordinator overseeing the process. This will allow for a joined-up approach and enable conflicting interests to be independently resolved. A mechanism for resolving such conflicts should also be developed.
66. As their most trusted adviser, a farmer's private vet should be included in the initial review stage. As animal health and welfare specialists and advocates from farm to fork, the veterinary profession is well-placed to advise and influence sustainable animal husbandry practices at whole system levels; safeguarding animal health and welfare whilst at the same time facilitating production efficiency and environmental protection. It is important that any advisor has sufficient knowledge and understanding of animal health and welfare, and how it can contribute to sustainable land management outcomes. The profession should therefore be closely involved in the proposed advisory service.
67. The veterinary profession is an integral part of the agricultural and food sectors. Veterinary surgeons working within the production animal sector work closely with farmers and animal keepers to protect animals, people and the environment they share. They promote and safeguard animal health and welfare, provide preventative healthcare and treatment for livestock, influence sustainable future livestock and food production, undertake research and development and ensure biosecurity measures are formulated, implemented and health and disease threats are monitored and acted upon. No export trade in live animals and animal products can take place without veterinary certification and veterinary specialists are crucial in protecting public health (including food safety). Both private veterinary surgeons and Government employed veterinary surgeons are uniquely positioned to make every on-farm contact count by providing a holistic approach to overall herd health and welfare, its wider determinants and, in turn, disease surveillance and prevention. Thus, the involvement of the veterinary profession should be an integral part of the advisory service.

68. It is vital that current schemes and good practice, including Farm Assurance and disease eradication schemes can be rewarded and included in the delivery of the farm sustainability plan, thus ensuring that the duplication of effort is avoided. This in turn will ensure the most efficient usage of the unknown known sum on funding available to deliver the scheme.

## Question 4 - Industry and supply chain (refer to chapter 6)

### Providing support to the industry and supply chain

69. Any future schemes should be collaborative, industry-led and cohesive across the UK.
70. Good animal health and welfare is paramount from farm to fork. We therefore support the focus being on the entire supply chain rather than restricted to land management businesses only, to help improve animal health and welfare at all stages of animals' lives.
71. However, if any schemes are to be widened across the supply chain, then this approach needs to be cohesive across the UK, to avoid Welsh farmers being put at any economic disadvantage in comparison to other devolved nations. CAP payments are an important part of farm incomes in Wales. Welsh agriculture, and livestock farms in particular, are far more dependent upon payments from the Common Agricultural Policy (CAP) than their English counterparts—in some cases this can account for 80% of farm income in Wales, as compared with an average of 55% for the whole of the UK. Wales currently receives 9% of the total UK CAP budget<sup>41</sup>. Wales has four times the number of people employed directly within agriculture, when compared with England, whose employment may be affected by the proposed changes. 88% of Wales' land area is agricultural land, mainly LFA land, and Wales' main agricultural output is livestock (51%) and livestock products (35%)<sup>42</sup>. Welsh agriculture is heavily reliant on producing lamb, and a third of this is exported to the EU. This change of financial support structure therefore comes at a time when the future of Wales' main livestock industry is uncertain, given our unknown future trading arrangements with the EU, and unknown future export markets. Wales may also end up on an unlevel playing field in terms of financial support, with Scotland, who are also producing lambs for the same market, depending on what policies are adopted in Scotland.
72. Any change in policy must be cognisant of these factors and properly examine any consequences, including performing detailed impact assessments. Any decision will also be made within a context of considerable uncertainty about future trading relationships with the EU and other countries. Agriculture, as a sector, is particularly exposed to any disruption in trading relationships with the EU and other countries. Any requirement for veterinary checks on animals and products of animal origin at ports could reduce the efficiency of produce moving to European markets and place additional administrative costs upon farmers.
73. We note the suggested creation of new abattoirs which could reduce long journey times. Our position on [the welfare of livestock during transport](#) recommends that consideration should be given to providing more opportunities for farm animal slaughter as close to the point of production as possible with appropriate animal health and welfare safeguards. However, we have concerns surrounding the non-compliance rate in some small abattoirs which could result in lower welfare standards<sup>43</sup>. Before creating new abattoirs there needs to be assessment of throughput vs provision to assess the need for new abattoir, to ensure existing abattoirs remain sustainable in their business model and do not destabilise the market place. Schemes have been put in place to support small abattoirs, which should also be evaluated before a new scheme is produced.
74. We support informed consumer education, informed choice and clear food labelling, in relation to animal welfare standards. Post-Brexit agriculture policy offers an ideal opportunity to support animal health and welfare by encouraging uptake of farm assurance schemes to incentivise animal health and welfare outcomes. Farm assurance schemes enable citizens to make sustainable and ethically informed choices about the food products they buy and the impact of these products on animal

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<sup>41</sup> UK Government Agricultural policy post-Brexit: <https://publications.parliament.uk/pa/cm201719/cmselect/cmwelaf/402/40207.htm>

<sup>42</sup> Armstrong, E. 2016. The Farming Sector in Wales. National Assembly for Wales Research Briefing.

<http://www.assembly.wales/research%20documents/16-053-farming-sector-in-wales/16-053-web-english2.pdf>

<sup>43</sup> Food Standards Agency Business Committee Meeting 2019 <https://www.food.gov.uk/sites/default/files/media/document/fsa-19-09-20-annex-animal-welfare-final.pdf>

health and welfare. Raising standards of animal welfare and food safety, creates consumer confidence in “brand Wales”.

75. We believe there is work to be done in communicating the value of improved animal health and welfare, and of assurance schemes in achieving this, to producers, farmers, citizens, retailers and others, so that the links between investment, good health and welfare outcomes (for animals and farmers) and economic returns are understood. In December 2017, we published a detailed policy position on [farm assurance schemes](#). The veterinary profession has a key role to play signposting the public in a professional and ethically justifiable way towards those farm assurance schemes that promote higher animal welfare.
76. As previously mentioned, investment in measures which make achieving desirable outcomes and compliance with basic standards easier would be beneficial. For example, investment in a well-conceived, collaborative, industry-led programme of disease eradication which farmers can easily follow has the potential to positively impact many areas of concern, including animal health and welfare, AMR, productivity and carbon usage. The veterinary profession is best placed to deliver such schemes, with excellent communication systems already in place between government vets, veterinary delivery partners, vets on farms and farmers themselves. There are existing programmes which have demonstrated this to be a well-received and effective approach in Wales, for example:
- [Gwaredu BVD](#) is a national programme which tests young stock to identify herds that have BVD present on farm and support these in order to remove the infected animals. All cattle farms in Wales are eligible to be part of the project irrespective of size or farming system, and over 50% of all farms have already been tested, within the first year of the scheme operating. Enrolled farms are spread all across Wales. In addition, 200 farms to date are working on dealing with the disease and will reap the benefits of improved animal health and welfare as well as reduced usage of antimicrobials, and many more will do so going forwards. The Gwaredu BVD scheme is a great example of utilising the relationship between farmers and their own vets to deliver positive outcomes efficiently. It is a good example of how the use of Rural Development Programme funding has yielded cost effective results and is also a good example of an industry led approach to disease eradication.
  - [Cymorth TB](#) links farmers, OV's and government vets and has been a good example of collaborative working since 2015. Official Veterinarians (OV's) are upskilled through a training package which leads to an OCQ(V)-Cymorth TB qualification, facilitating the provision of a comprehensive approach to the management of TB breakdowns, including a high level of support to farmers under restriction, minimising the impact of the breakdown. OV's have indicated that being part of Cymorth TB has enhanced their knowledge and the value they can offer as key players in the eradication of TB. This scheme has recently become opt-out to increase uptake.
  - The [Farming Connect](#) scheme is another great example of how vets can help deliver positive benefits on farms. Their training courses have utilised vets to deliver knowledge and skills transfer, for example in lambing techniques, improved livestock handling and the correct use of veterinary medicines. Their small capital grants scheme has proved successful, for example providing;
    - veterinary diagnostic testing such as faecal egg counts, helping to slow down the development of anthelmintic resistance
    - improved handling facilities, which can improve the accuracy and safety of TB testing
    - Electronic Identification readers and software for sheep farmers, improving traceability and surveillance capacity.
77. Members of the veterinary profession could be key to encouraging a collaborative approach, initiating local schemes, providing advice, designing programmes and conducting research in a local area. The veterinary profession is an integral part of the agricultural and food sector, working collaboratively with others to protect animals, people and the environment they share. Veterinary surgeons provide preventive healthcare and treatment for livestock, as well as carry out health monitoring and disease surveillance, promote good biosecurity, promote high animal health and welfare, undertake research and development, and optimise food productivity and sustainability. Further, veterinary surgeons uphold necessary legislation and international standards of animal welfare, food safety, accurate certification and traceability. By carrying out surveillance and

enforcement from farm to fork, Official Veterinarians (OVs) certify the trade in animals and animal products thus contributing to economic prosperity, the protection of public health (including from zoonotic disease incursion and antimicrobial resistance) and the sustainability of food production.

### Whether it is right for support to be subject to Sustainable Land Management

- 78.** As previously mentioned, BVA supports the principle of public money for public goods. The public goods that will be rewarded by the new scheme must be clearly defined, be based on sound scientific evidence, and should benefit the country as a whole, whilst not having a negative impact on the economies and communities that deliver them. The “*sustainable land management outcomes*” in this proposal follow this principle, so we are broadly supportive of the overarching framework.
- 79.** We are pleased that the proposals “*now explicitly recognise the interaction between food production and environmental outcomes*”. We were also pleased to read in 3.6. that “*In particular, the consultation exercise suggested the production of food and other economic goods and the production of environmental goods can be mutually reinforcing, not mutually exclusive.*” We therefore support the decision to utilise a single scheme and not the two schemes proposed previously.
- 80.** However, we are disappointed that animal health and welfare is not prominent enough in the proposed scheme, and not sufficiently recognised as an important public good/Sustainable land management outcome. Although animal health and welfare is now included as a specific action contributing to economic resilience, the proposals do not 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 antimicrobial resistance (AMR) as an environmental benefit. An environmental benefit scheme on land where livestock is kept must include animal health and welfare. For example, a farm with serious sheep scab infection in the flock should not be receiving funding for an environmental scheme in the absence of a parallel programme to eradicate sheep scab.
- 81.** Sustainable animal agriculture can be defined as animal agriculture<sup>44</sup> carried out in a way that meets the needs of the present without compromising the ability to meet the needs of the future. Sustainable animal agriculture should be undertaken in a way that is environmentally, ethically and economically acceptable for consumers, producers and wider society. As part of this, animal health and welfare should not be unnecessarily compromised to address human need and in order to be considered sustainable, agricultural systems must work towards the positive health and welfare of all farmed animals raised within them. BVA supports the [Farm Animal Welfare Committee \(FAWC\)’s principles for sustainable agriculture and animal welfare](#).
- 82.** To be considered sustainable, agricultural systems must provide for the five animal welfare needs, positive health outcomes and adhere to [OIE standards for animal health and welfare](#), offering stimulating living environments to allow for the performance of highly motivated behaviours; opportunities for positive welfare outcomes, such as comfort, pleasure, interest and confidence; and excellent health outcomes. The BVA position on [Sustainable animal agriculture](#) provides more information. We believe that, 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 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.
- 83.** Furthermore, recent research<sup>45</sup> 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. This research provides further evidence that UK ruminant agriculture can create positive Sustainable Land Management outcomes.
- 84.** 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 law<sup>46</sup>, their commitment to the

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<sup>44</sup> Where animal agriculture includes aquaculture and gamebirds

<sup>45</sup> Allen, MR, Shine, KP, Fuglestedt, JS, Millar, RJ, Cain, M, Frame, DJ, and Macey, AH (2018): A solution to the misrepresentations of CO2 -equivalent emissions of short-lived climate pollutants under ambitious mitigation. *npj Climate and Atmospheric Science*, 1(1), 16. <https://doi.org/10.1038/s41612-018-0026-8>

<sup>46</sup> Lesley Griffiths, Cabinet Secretary for Energy, Planning and Rural Affairs, Written Statement - Animal Sentience, <https://gov.wales/about/cabinet/cabinetstatements/2018/animalsentience/?lang=en>

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. We are disappointed that this is not sufficiently reflected in these proposals, in contrast to the plans for environmental actions within this document, and the ambitious system of public money for public goods that has been taken forward in England which explicitly lists animal health and animal welfare to receive financial support. We therefore believe that animal health and welfare must be recognised as an important outcome by any new agricultural payments scheme.

85. A new agricultural policy offers an opportunity to harmonise support to farms with other key Welsh, UK and international strategies. We would ask that animal health and welfare policy, legislation and strategies are given full consideration alongside these other factors.

#### **Whether the proposed priorities reflect the right areas of focus**

86. We are supportive of the proposed priorities and recognise that they can contribute to sustainable land management goals.
87. We have recommended that animal health and welfare should feature more prominently within the Sustainable Land Management framework. All five proposed priorities can also contribute to positive animal health and welfare if it is properly recognised as an outcome that has economic, environmental and social benefits.
88. We welcome the recognition of farm assurance schemes in promoting Sustainable Brand Values. Farm assurance schemes allow producers to demonstrate that their food products, both animal and non-animal derived, have met specific, independently certified standards at each stage of the supply chain from farm to fork. These standards include, but are not limited to, animal health and welfare, food safety, stockmanship training and competencies and environmental protection.
89. Many of our members' roles in Wales are interlinked with those of farmers. The veterinary profession is an integral part of the agricultural and food sector, working collaboratively with others to protect animals, people and the environment they share. It must be recognised that any measures which may impact on livestock farmers in Wales may have resultant consequences for rural veterinary businesses. Ensuring the continued capability of farm animal veterinary practice as a means of achieving the public goods of animal health and welfare should be properly assessed by the Government.

#### **Question 5 - Regulatory framework (refer to chapter 7)**

##### **Proposals to improve the current regulatory system and develop a new regulatory framework**

90. We support the proposal to make regulations clearer since this will improve understanding, accessibility and compliance.
91. It is important that any new regulations do not reduce standards, and take care to avoid any loopholes which may result in lower standards of animal health and welfare. Any changes must be soundly evidence based and there should be a commitment to review in the light of new scientific information. Any change must also be considered in line with those proposed by other administrations in the UK so that legislative loopholes do not appear, and that Welsh farming is not disadvantaged in the market place.
92. Animal health and welfare must be an integral part of the new regulatory framework. As animal health and welfare specialists and advocates from farm to fork, the veterinary profession is well-placed to advise and influence sustainable animal husbandry practices at whole system levels; safeguarding animal health and welfare whilst at the same time facilitating production efficiency and environmental protection. They should therefore be involved in the development of any new framework. BVA Welsh Branch would welcome the opportunity to work with the Welsh Government on this.
93. Wales must consider how best to utilise agricultural support to incentivise animal health and welfare within the rules of the WTO, as well as any ongoing agreements that we may have with the EU. The WTO Agreement on Agriculture provides a framework for agricultural support. If Wales wishes to reduce the likelihood of any challenge in the WTO to a new agricultural support regime, it may seek

to minimise both trade distortion and direct impact on production. To achieve this farm payments should be through a government-funded scheme which does not provide price support to farmers linked to market value. The ambition must be to raise standards of animal health and welfare, and under no circumstances should our existing high standards be compromised by any future agreements with trading partners. Any new schemes must recognise the uncertainty of future trading arrangements, and potential changes in Wales' agricultural productivity, imports and exports following our departure from the EU, and should not put us at an economic disadvantage whilst navigating a new trading landscape.

94. As now, there will be a requirement to comply with the animal health and public health (including food safety) standards set by the World Organisation for Animal Health (OIE); World Health Organisation (WHO) and Food and Agriculture Organization of the United Nations (FAO). WTO rules for trade in animals and animal products function on this basis.

## Question 6 - Transition and funding (refer to chapter 8)

### The purpose and design of a transition period

95. BVA is supportive of the Welsh Government's plan to provide a phased transition period which aims to provide farmers with stability and confidence to invest in their businesses and thereby deliver public benefit.
96. Any transition period must ensure that there is no resultant decrease in animal health, animal welfare or public health standards due to changes in the financial support structure. For example, animal products imported from non-EU countries should have been produced under equivalent welfare standards to our own.
97. The transition period must take into account the need to adequately train sufficient numbers of advisers to undertake the farm sustainability review and farm sustainability plan needed to enter the scheme. Time must also be allowed to pilot this stage of the process to make sure there are no unintended negative consequences.
98. BVA recognises that many of our members' roles in Wales are interlinked with the agricultural sector. The provision of 24 hour rural veterinary services for production animals is dependent on the viability of practices caring for these animals, which in turn depends on a thriving livestock production sector. It must be recognised that any measures which may result in a reduction of the number of livestock farmers in Wales may have resultant negative consequences for the provision of rural veterinary services.
99. Common Agricultural Policy (CAP) payments are an important part of farm incomes in Wales. Welsh agriculture, and livestock farms in particular, are far more dependent upon payments from the CAP than their English counterparts—in some cases this can account for 80% of farm income in Wales, as compared with an average of 55% for the whole of the UK. Wales currently receives 9% of the total UK CAP budget<sup>47</sup>. Wales has four times the number of people employed directly within agriculture when compared with England, whose employment may be affected by the proposed changes. 88% of Wales' land area is agricultural land, mainly less favoured area (LFA) land, and Wales' main agricultural output is livestock (51%) and livestock products (35%)<sup>48</sup>. Welsh agriculture is heavily reliant on producing lamb, and the consultation document highlights that a third of this is exported to the EU. This change of financial support structure therefore comes at a time when the future of Wales' main livestock industry is uncertain, given our unknown future trading arrangements with the EU, and unknown future export markets. Wales may also end up on an unlevel playing field in terms of financial support, with Scotland, who are also producing lambs for the same market, depending on what policies are adopted in Scotland.
100. Any change in policy must be cognisant of these factors and properly examine any consequences, including performing detailed impact assessments. Any decision will also be made within a context of considerable uncertainty about future trading relationships with the EU and other countries. Agriculture, as a sector, is particularly exposed to any disruption in trading relationships with the EU and other countries. Any requirement for veterinary checks on animals and products of

<sup>47</sup> UK Government Agricultural policy post-Brexit: <https://publications.parliament.uk/pa/cm201719/cmselect/cmwelaf/402/40207.htm>

<sup>48</sup> Armstrong, E. 2016. The Farming Sector in Wales. National Assembly for Wales Research Briefing. <http://www.assembly.wales/research%20documents/16-053-farming-sector-in-wales/16-053-web-english2.pdf>

animal origin at ports could reduce the efficiency of produce moving to European markets and place additional administrative costs upon farmers. We also do not currently have the additional veterinary workforce capability necessary to meet increased demand for trade certification of animal products following potential changes to current trading arrangements.

- 101.** This uncertainty means it will be difficult to assess the full impact of the withdrawal of direct payments to farm incomes. More challenging will be determining the impact on the wider rural economy that delivers goods and services to farms. None of Wales' agricultural output could be realised without the veterinary services of our members throughout production, processing and export, and we recognise that members' ability to provide livestock veterinary services may also be indirectly impacted upon by changes to CAP payments. Farm animal veterinary practices in the UK represent an important service sector to livestock farmers, and act as a means to detect disease and enforce animal health and welfare legislation. Ensuring the continued capability of farm animal practice as a means of achieving the public goods of animal health and welfare should be properly assessed by the Government.
- 102.** Detailed impact assessments of any new support schemes are vital to identify potential unintended consequences, including to animal health, animal welfare, public health and environmental health. We welcome the assurance that Welsh Government is *"clear we cannot make changes until we can demonstrate a new system is adequately designed, we have undertaken the relevant impact assessments and we are confident it is administratively practicable."* These must include assessments on the effect proposed changes could have on animal health and welfare, public health and food safety, as well as economic and community effects.
- 103.** It will not be possible to simultaneously transition all claimant farms in Wales onto a new scheme of such complexity. Therefore, some farms will still be on the old scheme whilst others have entered the new scheme. Due consideration needs to be given to how any new scheme can be rolled out gradually, whilst ensuring that all farms receive their due share of funding throughout the transition period. Any delay in payment could lead to negative consequences for animal welfare. CAP could be simplified whilst it is still in operation by introducing a Single Farm Payment (SFP) threshold above which payments will be capped, avoiding a large amount of funding going to inactive claimants who own large areas of land.

#### Allocation of funding

- 104.** Whilst we recognise that foresters and farmers have a role to play in sustainable land management, we are concerned that broadening the scheme could be detrimental to the farming community. Given that only 60 percent of land packages in Wales that could be eligible for the schemes currently receive direct payments, whatever funding is available following EU exit is likely to be distributed across a higher number of land owners, reducing the amount available per farmer.
- 105.** It is important that funding from UK government is ring-fenced for Welsh agriculture and is used for the benefit of Welsh farming, the cornerstone of the £6.9 billion Welsh food and drink supply chain, which represents over 58,000 jobs<sup>49</sup>. The ambition must be to enhance our already high standards of animal health and animal welfare, in order to increase productivity and efficiency and economic resilience. There is strong evidence that this will also provide environmental benefits. The veterinary profession should be at the heart of helping farmers to realise this ambition.

### Question 7 - Analytical approach (refer to annex A)

#### The analytical approach

- 106.** Detailed impact assessments of any new support schemes are vital to identify potential unintended consequences, including to animal health, animal welfare, public health and environmental health.
- 107.** There needs to be greater recognition of the importance of assessing potential impacts on animal health and welfare. Annex A currently focuses solely on environmental outcomes with no mention of the analytical approach to assessing impacts on animal health or animal welfare. Any proposed scheme that potentially affects livestock and food production methods must have a detailed impact assessment performed on the many potential consequences that may be induced. Failure to recognise and protect animal health and animal welfare as public goods could have

<sup>49</sup> <https://www.nfu-cymru.org.uk/campaigns/back-welsh-farming/>

serious implications, including on public health. For example, disease surveillance and biosecurity, the transmission of zoonotic and food-borne diseases, the continued availability of vital medicines, food safety and consumer confidence.

108. Vets work closely with farmers and keep a range of records. They could therefore be very helpful during when collecting data and should be consulted as part of the assessment process.

### Question 8 - Welsh language

109. BVA is aware of the Welsh language act and the importance of the Welsh language in Welsh communities, particularly in rural areas likely to be most affected by agricultural policy. Our high animal health and animal welfare standards rely on effective communication between farmers, their own vets and government vets, for example to enable effective disease surveillance to be carried out. Welsh language is an essential aspect of this communication and it is important for animal health and welfare that farmers in all parts of Wales are able to access schemes and veterinary services in their chosen first language.

### Question 9 - Other comments

110. We welcome the opportunity to respond to "*Sustainable Farming and our Land*". We broadly support the proposed scheme, however, there needs to be more clarity on how Animal Health and Welfare will be supported.
111. Our key points are:
- We welcome and fully support the increased presence of animal health and welfare within this updated proposal, compared with the version consulted on previously.
  - However, the weight given to animal health and welfare within the framework is insufficient given the high proportion of livestock farming in Wales. Animal health and welfare should be included as a benefit within the outcomes framework.
  - In the current proposals, animal health and welfare standards are only listed as an outcome related to high competitiveness and economic resilience. Being listed as just one of nineteen outcomes does not show the importance of animal health and welfare. This also fails to recognise that animal health and welfare is interwoven with many social, economic and environmental outcomes. We support the Sustainable Land Management approach as a means to incentivize public goods. We welcome the use of a single system that recognizes the mutual benefits of economic, environmental, social and animal health and welfare outcomes.
  - We support the outcomes-based approach that will underpin the SLM approach, However, this could be simplified and clarified. Greater clarity is needed to differentiate between the benefits and outcomes.
  - The role of the veterinary surgeon is underutilised within the current plan. Vets are regarded as the most influential advisors to farmers within the decision-making process<sup>50</sup>. They should be included within the sustainable farming scheme to reflect this role as trusted advisors on animal health and welfare planning, husbandry, biosecurity, biocontainment and preventative medicine.
112. As agricultural policy in the UK is devolved, administrations have been able to shape agricultural policy to the needs of their respective jurisdictions. At the same time, the EU has ensured a degree of coherence to agricultural policy amongst all four administrations. Brexit presents an opportunity to tailor agricultural policy to suit the countries of the UK, however coordination and oversight on matters of animal health and welfare is crucial. 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.
113. To facilitate this, we would welcome the establishment of a UK wide body to oversee and coordinate animal health and welfare policy across the four administrations of the UK and facilitate

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<sup>50</sup> Alarcon, P., Wieland, B., Mateus, A.L.P., Dewberry, C. 2014. Pig farmers' perceptions, attitudes, influences and management of information in the decision-making process for disease control, *Preventive Veterinary Medicine*, 116 (3): 223-242.

partnership working between industry and government to tackle endemic disease and animal health and welfare challenges.

114. We would welcome the further development of animal welfare metrics across species and sectors where they do not currently exist so that indicators of positive welfare, emotional and behavioural states are incorporated into welfare outcomes assessment and lifetime welfare assessment where possible.
115. Government should also promote the benefits of properly valuing quality animal-derived products, where quality encompasses good animal health and welfare, food safety, environmental protection and fair returns for producers.
116. We would welcome the opportunity to work closely with the Welsh Government to expand upon these proposals.