

Agriculture (Wales) White Paper Consultation Response Form

Data Protection

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation.

If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.

Confidentiality

Responses to consultations may be made public on the internet or in a report.
If you do not want your name and address to be shown on any documents we produce please indicate here

If you do not want your response to be shown in any document we produce please indicate here

Name :	British Veterinary Association	
E-mail:	policy@bva.co.uk	
Are you responding as an individual or as an organisation?	Organisation	
Are you or your organisation based in Wales?	UK wide organisation with representatives in Wales	
If you are answering as an individual, do you	Yes	

Identify as Welsh speaking?	No	
First half of postcode (4 digits)	W1G 9	

Please indicate which of these best represent you or your organisation (please select only one)	Farming	
	Forestry	
	Environmental	
	Veterinary	/
	Tourism/Hospitality	
	Food and timber supply chains	
	Public Sector	
	Private Sector	
	Third Sector	
	Trade Union/Representative	
	Research/Academia	
	Other	

If you have indicated that you are a farmer, please identify your main farm activity (please select only one)	Sheep	
	Beef	
	Dairy	
	Arable	
	Horticulture	
	Poultry	
	Mixed	
	Other	

Do you currently have rights to graze stock on a common?	Yes	
	No	

Are you a tenant farmer?	Yes	
	No	

Are you a CAP recipient?	Yes	
	No	

If you responding as an individual, what age bracket are you in?	Under 18	
	18-34	
	35-49	
	50-64	
	65+	

How to respond

Responses should be returned by **26 March** to

Land Management Reform Division
 Welsh Government
 Cathays Park
 Cardiff
 CF10 3NQ

Responses completed electronically to be sent to:
AgricultureWalesWhitePaper@gov.wales
PapurGwynAmaethCymru@llyw.cymru

Regulatory Reform

1. What are your views on:
 - (a) The proposed approach to the creation of the National Minimum Standards?
 - (b) The need for flexibility to amend the National Minimum Standards where necessary? Are there any further considerations which are needed?

Please provide comments to support your view e.g. potential benefits and impacts.

1. We support the proposal to make regulations clearer with the aim of improving understanding, accessibility and compliance.
2. Animal health and welfare must be an integral part of the new regulatory framework, and we are pleased to see that the paper specifically states that regulatory reforms will include improvements to animal health and welfare.
3. 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 marketplace.
4. As animal health and welfare specialists and advocates from farm to fork, veterinary surgeons should be involved in the development of the National Minimum Standards, to ensure they minimise the risk of welfare harms and ensure that animal health and welfare is properly protected. Veterinary surgeons are also well placed to advise on the animal health and welfare interventions needed in the event of minimum standards not being met, as the impact of non-compliance should be considered as part of the development. Vets should also be involved in the development of a monitoring system and penalties in order to protect animal welfare.
5. The veterinary profession could also be key to helping farmers understand the minimum standards, as they are 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. 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 sustainability¹. 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.
6. Achieving the minimum standards should not be considered an aspiration for farmed animals. The ambition should be to encourage the highest standards and raise the bar at every level. Welsh Government could use this opportunity to improve the minimum standards, to ensure all animals have a life worth living.
7. BVA Welsh Branch would welcome the opportunity to work with the Welsh Government on this.

¹ British Veterinary Association (2018), [Position on veterinary scanning surveillance \(animal health and disease monitoring\)](#)

2. What are your views on:

(a) How advice and guidance can effectively support farmers to understand the National Minimum Standards; and

(b) The further considerations needed for advice and guidance? For example, what form guidance should take, who should provide it, the scope of guidance and how farm advisory services may support farmers.

Please provide comments to support your view, e.g. potential benefits and impacts associated with the considerations.

1. To ensure the updated regulations can have an impact on the ground, it will be essential that they clearly communicated and well-understood. We agree that it will be vital to provide appropriate and accessible advice and guidance to support regulatory reform and to aid the agricultural industry in achieving the outcomes intended through regulation. 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.
2. The veterinary profession is key to ensuring there is good widespread understanding of the minimum standards. Many of our members' roles in Wales are interlinked with those of farmers, and they are 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. 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 sustainability². 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.
3. BVA Welsh Branch would welcome the opportunity to work with the Welsh Government on this.

² British Veterinary Association (2018), [Position on veterinary scanning surveillance \(animal health and disease monitoring\)](#)

3. What are your views on the proposals for civil sanctions to enable proportionate enforcement of regulations? Are there any further considerations which are needed?

Please provide comments to support your view, e.g. potential benefits and impacts associated with the considerations.

1. This is not our area of expertise, but we support sanctions which are proportionate to the non-compliance or offence.
2. It will be important to recognise the impact the threat of sanctions, penalties and civil proceedings can have on a farmer's mental wellbeing, and the risks this poses to their health. This must be taken into account when deciding what is a proportionate response.

SLM – Future support

4. What are your views on the proposed purposes for funding in support of the delivery of SLM? Are there other purposes which you feel should be considered?

Please provide comments to support your view e.g. potential benefits and impacts.

1. We support the Sustainable Land Management approach as a means to incentivise public goods, and welcome the use of a single system that recognises the mutual benefits of economic, environmental, social and animal health and welfare outcomes. We support the outcomes-based approach that will underpin the SLM scheme. However, there needs to be more clarity on how Animal Health and Welfare will be supported.
2. We are pleased to see that the white paper specifically proposes to provide Welsh Ministers with the powers to fund improvements to the delivery of animal health and welfare standards beyond the legal baseline. We accept that the scheme is intended to improve animal health and welfare standards, but the weight given to animal health and welfare within the framework is insufficient given the high proportion of livestock farming in Wales.
3. It would be reassuring if animal health and welfare outcomes were included when giving examples of outcomes that will receive funding. For example, in paragraph 2.60, the white paper states *“The SFS should reward farmers appropriately for the production of outcomes (healthier soils, clean air, clean water, improved biodiversity, actions to reduce global warming)”*. The inclusion of only environmental considerations does not make it clear that funding is available for other important public goods, and this is repeated throughout the document. It would be useful to include examples such as biosecurity or reduction in use of antibiotics as outcomes which would receive funding. This would make it clearer to farmers that they are able to receive funding for a range of benefits.
4. In our response to the *Sustainable Farming and Our Land* consultation, we called for animal health and welfare to be specifically 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, and also fails to recognise that animal health and welfare is interwoven with many social, economic and environmental outcomes.
5. Animal health and welfare must be recognised a key sustainability objective. 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:
 - 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.

6. 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 needs³ 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.⁴ 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
7. 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.
8. 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 process⁵. 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, public health, and preventative medicine.
9. The BVA position on [Sustainable animal agriculture](#) provides more information, and BVA Welsh Branch would welcome the opportunity to work with the Welsh Government on this.

Industry and Supply Chain

5. What are your views on the proposed priorities for industry and supply chain support?

Please provide comments to support your view e.g. potential benefits and impacts.

³ Animal Welfare Act 2006, Animal Health and Welfare (Scotland) Act 2006, Welfare of Animals Act (Northern Ireland) 2011

⁴ 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>

⁵ 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.

1. We support the scheme being collaborative, industry-led and cohesive across the UK.
2. 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.
3. 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 budget⁶. 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%)⁷. 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, with the agri-food sector responding to our new 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.
4. Any decision will also be made within a context of considerable disruption in our trading relationships with the EU and other countries. Agriculture, as a sector, is particularly exposed to the changes in trade requirements with the EU. The costs of export health certification and 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.
5. 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 health and welfare. Raising standards of animal welfare and food safety, creates consumer confidence in “brand Wales”.
6. 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

⁶ UK Government Agricultural policy post-Brexit:
<https://publications.parliament.uk/pa/cm201719/cmselect/cmwelaf/402/40207.htm>

⁷ 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>

public in a professional and ethically justifiable way towards those farm assurance schemes that promote higher animal welfare.

7. Investment in measures which make achieving desirable outcomes and compliance with the minimum 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 Arwain Vet Cymru project, funded by Welsh Government through the RDP programme, is a collaborative initiative which aims to train and support a national network of veterinary prescribing champions across Wales to improve antibiotic prescribing in cattle and sheep. 'Prescribing Champions' from over 80% of practices providing farm services are taking part in an extensive program of training and policy development. The project is participatory in approach, aiming to empower vets to develop and implement bespoke stewardship interventions in their businesses and share experiences and ideas. The project has been such a success that it has now led to a similar UK-wide initiative the [Farm Vet Champion program](#).
- 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.
- The [Stoc+ project](#), run by Hybu Cig Cymru, works with farmers and vets to promote proactive flock and herd health management, to help Wales lead the world in animal welfare, sustainability and efficiency.
 - [HerdAdvance](#) is an AHDB Dairy Improvement Programme funded by Welsh Government through the RDP scheme. It aims to help Welsh dairy farmers lift herd profitability and performance by improving disease prevention and control. A key part of the programme is vets working with farmers to improve their herd health management and disease control.
8. Members of the veterinary profession are 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.

Collection and sharing of data

6. What are your views on the proposed purposes for collecting, sharing and linking data?

Please provide comments to support your view e.g. potential benefits and impacts.

1. We support improving provisions to collect and process of data, and the introduction of new technology which can help to streamline the systems. We are pleased to see that the white paper recognises that it will be important to remain consistent with the rest of the UK to enable analysis at a national level.
2. The UK has a well-established network of scanning surveillance which can be enhanced through the exploration of new data sources and data collection and feedback practices. BVA supports the use of syndromic surveillance or 'health informatics'⁸ to increase the coverage of the current scanning surveillance network across species sectors. Syndromic surveillance – that is to say the realtime collection, analysis, interpretation and dissemination of health-related data – enables the early identification of the impact (or absence of impact) of potential human or veterinary public-health threats across species areas.⁹
3. 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. This 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 billion¹⁰, and the value of UK aquaculture outputs at £0.59 billion¹¹. A robust surveillance system is integral to the realisation of these high-value outputs.
4. BVA has produced a detailed policy position on veterinary scanning surveillance which outlines our vision for animal health and disease monitoring post-Brexit¹². 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:
 - 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

⁸ Health informatics is the reuse or repurposing of existing health data for research or surveillance

⁹ Pig Health and Welfare Council (PHWC), 2017. 'Report of Roundtable on Syndromic Surveillance in Pigs' [pdf] Available at: <https://pork.ahdb.org.uk/media/273228/phwc-ss-roundtable-report-2016.pdf> [Accessed: 8 January 2018].

¹⁰ Defra, DAERA, Welsh Government, Scottish Government (2017), Agriculture in the United Kingdom 2016

¹¹ 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

¹² British Veterinary Association (2018), [Position on veterinary scanning surveillance \(animal health and disease monitoring\)](#)

- 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
5. 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.

7. What are your views on the establishment of a national database for farms and livestock?

Please provide comments to support your view e.g. potential benefits and impacts.

1. We support improving provisions to collect and process of data, and the introduction of new technology which can help to streamline the systems. A national database could improve accessibility and compliance.
2. A new national database could offer opportunities for improved monitoring of new and emerging disease through data collection, analysis and sharing across species, with potential benefits for both public health and animal health and welfare.
3. Any new database must be compatible with those used by other administrations in the UK, to aid movement of animals across the UK and the sharing of data. It could also be beneficial to consider compatibility with EU databases for the same reasons.
4. In our policy position on veterinary scanning surveillance¹³, we draw on examples of successful surveillance systems to highlight key factors at play. These include:
 - a standardised method of data input.
 - being easy to submit data, with a balance between the level of detail required and the associated increase in time and cost.
 - Sharing of data is incentivised by enabling veterinary professionals, veterinary practices, animal keepers and laboratories to derive professional, economic, logistic and public relations value from inputting data, on top of the value derived for animal health and welfare
 - sufficient connectivity and IT literacy amongst those inputting data.
 - appropriate technology, and skills and expertise, to distil syndromic surveillance data from different sources.
 - the importance of qualitative data being recognised and a mechanism for capturing this.
 - Data collection includes consent for the anonymised sharing of data to allow for its wider use.
5. Any new national database should include these key points and replicate previous successful approaches. We also recommend that a respected, independent body should be identified as the trusted 'honest-broker' of data and information, which Welsh Government would be well placed to lead on.
6. Please refer to our [position on veterinary scanning surveillance \(animal health and disease monitoring\)](#) for more information.

¹³ British Veterinary Association (2018), [Position on veterinary scanning surveillance \(animal health and disease monitoring\)](#)

Thinking about the SFS:

8. In terms of the future scheme, what are your views on the proposals to enable the data we collect on a farm to be used by farmers to track progress and demonstrate their sustainability credentials?

Please provide comments to support your view e.g. potential benefits and impacts.

1. In our policy position on veterinary scanning surveillance¹⁴, we draw on examples of successful surveillance systems to highlight key factors at play. One of these key factors is that submission and sharing of data should be incentivised by enabling veterinary professionals, veterinary practices, animal keepers and laboratories to derive professional, economic, logistic and public relations value from inputting data, on top of the value derived for animal health and welfare.
2. The proposals to enable the data collected to be used to track progress and demonstrate sustainability credentials could offer an incentive for farmers to share data.
3. We support efforts to assist producers and consumers to consider how well a production system holistically meets all of an animal's health and welfare needs. We therefore recommend that farmers are also able to use any tracking on the data provided to demonstrate their animal health and welfare credentials.

¹⁴ British Veterinary Association (2018), [Position on veterinary scanning surveillance \(animal health and disease monitoring\)](#)

Thinking about regulatory compliance:

9. What are your views on the proposals for improving the monitoring of regulatory compliance?

Please provide comments to support your view e.g. potential benefits and impacts.

1. This is not our area of expertise, but we support initiatives to improve compliance with baseline legislative requirements.

10. What do you think needs to be considered in future to enable regulators to effectively monitor regulations?

This is not our area of expertise

Forestry and woodland

11. What are your views on the proposed amendments to forestry legislation?
Please provide comments to support your view e.g. potential benefits and impacts.

It is not within our remit to comment on these proposals

12. What are your views on how the Welsh Government can support landowners in Wales to benefit from carbon markets for planting trees?

It is not within our remit to comment on these proposals

Tenancies

13. Do you think the dispute resolution procedures described in the proposals should be extended to FBTs?

Please provide additional evidence to support your view e.g. the extent to which this is a problem currently, the likely benefits and impacts.

It is not within our remit to comment on these proposals

14. Do you think there will be instances where landlords may require the same access to dispute resolution as described above?

Please provide additional evidence to support your view e.g. the extent to which this is a problem currently, the likely benefits and impacts.

It is not within our remit to comment on these proposals

15. Do you think it would be appropriate to allow joint landlord/tenant SLM scheme agreements?

Please provide evidence to support your views e.g. the extent of the need, the likely benefits, drawbacks and impacts.

It is not within our remit to comment on these proposals

Animal Health and Welfare

16. What are your views on the proposals for additional powers for Welsh Ministers to:

- a) Establish Movement Control Zones to control the movement of animals, semen, embryos, animal products, animal by-products and/or other things that can spread infection e.g. equipment and utensils, in the event of a significant, new animal disease threat, where there is currently no or limited power to do this?

- b) Specify 'animal', 'farmed animal', 'livestock', 'pet animal' and 'animals intended for agricultural purposes', beyond the current rigid traditional definitions to ensure animal disease control measures can be applied appropriately and flexibly to any species of kept animal where there is a potential disease risk?

Please provide comments to support your view e.g. potential benefits and impacts.

1. We support the proposals for additional powers to limit movement of animals and animal by-products in the event of a significant, new animal disease threat. We also support widening the definition of animal, since the species type is important when considering restrictions. For example, any restrictions on movement of pet animals would need to be conceived, communicated and enforced differently than those for livestock.
2. The extension of wider ranging generic control mechanisms would be useful when there is evidence of new threats, but the full epidemiological links between species may not yet be clear. Such restrictions should be subject to published assessment so that the agricultural industry can understand the need for such measures being taken. A power is currently available to apply movement restrictions on an area when there is a suspicion or threat of Foot and Mouth Disease, before the disease is confirmed. This proactive approach is beneficial in reducing the spread of disease while the situation is being investigated. Being able to extend control measures in a precautionary way gives great benefit to government and the industry to minimise the impact of a disease incursion. It does need to be used sensitively and with dissemination of the currently available evidence on which it is based. Widening the definition of animal should also aid the precautionary approach, but again relies on publication of the rationale.
3. In our bTB position, we recognise that one of the greatest threats to the health status of an established herd is through contact with cattle from outside of the herd. According to the study by Crispell et al. (2019)¹⁵, the majority of bTB transmission is within species, both cattle to cattle and badger to badger, confirming that transmission within the cattle population is important for spreading bTB. In the context of bTB control, improving biosecurity involves stopping TB-infected cattle entering the herd and reducing the bTB risk from neighbouring cattle herds. This could also be true of future significant disease threats.
4. The study on herd-level risk factors after the 2001 foot-and-mouth disease epidemic reported that contacts with cattle from contiguous herds and sourcing cattle from herds with a recent bTB history were associated with an increased risk of a bTB breakdown¹⁶.
5. We recommend that farmers should agree and implement a herd policy for introducing any new animals and isolation with their private vet as part of their herd health plan. When cattle enter a farm, they should ideally be quarantined from other cattle in the herd to ensure that they are not able to transmit any infection and to give time to perform tests. This applies to all cattle entering the herd, including newly purchased stock, hired bulls, and cattle that are already under the same herd ownership but that return from being away, e.g. from shows, markets, common grazing and from other premises. The risk is greater for purchased stock and hired bulls than for animals that have been off the farm for a short time, nevertheless, it is important to assume that even short spells off-farm can give the opportunity for infection at other premises¹⁷. Access to full testing and movement history at the point of sale could also be useful and complement quarantine.

¹⁵ Crispell J, Benton CH, Balaz D, et al. Combining genomics and epidemiology to analyse bi-directional transmission of *Mycobacterium bovis* in a multi-host system. *Elife*. 2019 Dec 17;8:e45833. doi: 10.7554/eLife.45833

¹⁶ Johnston WT, Vial F, Gettinby G, et al. Herd-level risk factors of bovine tuberculosis in England and Wales after the 2001 foot-and-mouth disease epidemic. *International Journal of Infectious Diseases*. 2011 Dec 1;15(12):e833-40. doi: 10.1016/j.ijid.2011.08.004

¹⁷ TBhub, [Responsible cattle movements](#).

6. The practicality of quarantining cattle depends upon several factors, including the number of animals purchased, their purpose (management stage) within the herd and the availability of suitable isolation facilities. Therefore, if isolation cannot be achieved then considering a post movement test 60 days after arrival should be considered to reduce the risk of an undisclosed reactor becoming a shedder into the herd.
7. There is also increasing awareness of the potential infection risk posed by manure from bTB infected cattle. Research suggests that *M. bovis* can survive in stored slurry for up to six months¹⁸. On pasture, *M. bovis* can survive in cattle faeces for up to two months in warm summer conditions and up to 5-6 months in cold winter conditions¹⁹. Survival of *M. bovis* is typically higher in cool, moist, dark conditions and lower in hot, dry, sunny conditions. Solid manure goes through a composting process resulting in high temperatures of 50°C+ which will likely kill the bacteria. However, composting conditions can be variable, so it is possible that it could survive in parts of a manure stack. The risk of infection from manure is believed to be lower than from slurry, but bTB transmission from manure is still possible. The full risk of infection with different cattle manure systems is not fully understood, and further research examining this would be beneficial. However, farmers can take steps to reduce any potential risk of infection by properly storing slurry for more than six months and ensuring full composting of solid manure before use²⁰.

Snares

17. What are your views on the proposal for a power to enable increased controls covering such matters as the manufacture, sale and use of snares? Do you think such a power is required? If not, why not? If so, what matters do you think the power should be used to address?

¹⁸ Scanlon MP, Quinn PJ. The survival of *Mycobacterium bovis* in sterilized cattle slurry and its relevance to the persistence of this pathogen in the environment. *Irish Veterinary Journal*. 2000;53(8):412-5.

¹⁹ Williams RS, Hoy WA. The viability of *B. tuberculosis (bovinus)* on pasture land, in stored faeces and in liquid manure. *Epidemiology & Infection*. 1930 Nov;30(4):413-9. doi: [10.1017/S0022172400010561](https://doi.org/10.1017/S0022172400010561)

²⁰ Phillips CJ, Foster CR, Morris PA, Teverson R. The transmission of *Mycobacterium bovis* infection to cattle. *Research in veterinary science*. 2003 Feb 1;74(1):1-5. doi: [10.1016/S0034-5288\(02\)00145-5](https://doi.org/10.1016/S0034-5288(02)00145-5)

1. In some circumstances snaring may be used to control wildlife in view of economic and practical constraints. For example, wild species that threaten farmed animals, native animals or humans by killing for food or by spreading disease are sometimes controlled, but this must always be done as humanely as possible.
2. There are concerns regarding animals killed or injured rather than held by snares, and the percentage of non-target species sometimes caught in snares. The British Veterinary Zoological Society (BVZS) is an academic and clinical organisation dedicated to the advancement of veterinary knowledge and skill in exotic pets, zoo animals and wildlife. Their position is that the use of snares falls outside of what is considered to be reasonable management.
3. Increased powers could be useful in relation to controlling and regulating the use of snares. For example, research has shown a significant reduction in capture of non-target species when well-designed snares are set properly in accordance with the Code of Practice.
4. We support the [approach taken in Scotland](#) for controlling and regulating the use of snares, and would like this to be adopted across the UK. We therefore support the proposal for a power to enable increased controls covering the manufacture, sale and use of snares.
5. A full and proper consultation should be undertaken before any new regulations are introduced.

Integrated Impact Assessment

18. What are your views on the impacts we have identified in the integrated impact assessments? Are there any further impacts that should be considered?

This is not our area of expertise

Welsh Language

19. We would like to know your views on the effects that the White Paper proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

1. 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.
2. BVA supports initiatives such as [Welsh4Vets](#), a scheme led by the Wales Veterinary Science Centre to offer the chance to learn or practice speaking in, and listening to, Welsh. We recognise that having a little bit of knowledge of conversational Welsh can help to integrate with clients and communities.
3. BVA also supports the new Aberystwyth School of Veterinary Science at Aberystwyth University, which will welcome its first students in September 2021, and will provide opportunities for students to study specific areas of veterinary science in Welsh.

20. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

It is not within our remit to comment on this

Any other comments

21. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

4. We welcome the opportunity to respond to the “Agriculture (Wales) White Paper”. We broadly support the proposed bill, however, there needs to be more clarity on how Animal Health and Welfare will be protected and improved.
5. Our key points are:
 - Animal health and welfare must be an integral part of the new regulatory framework, and we are pleased to see the paper specifically states that regulatory reforms will include improvements to animal health and welfare.
 - 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. As animal health and welfare specialists and advocates from farm to fork, veterinary surgeons should be involved in the development of the National Minimum Standards, to ensure they minimise the risk of welfare harms and ensure animal health and welfare is properly protected.
 - To ensure the updated regulations can have an impact on the ground, it will be essential that they clearly communicated and well-understood. 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. The veterinary profession is key to ensuring there is good widespread understanding of the minimum standards.
 - We support the Sustainable Land Management approach as a means to incentivise public goods, and the outcomes-based approach that will underpin the SLM scheme. However, there needs to be more clarity on how Animal Health and Welfare will be supported beyond the legal baseline. We accept that the scheme is intended to improve animal health and welfare standards, but the weight given to animal health and welfare within the framework is insufficient given the high proportion of livestock farming in Wales.
 - The role of the veterinary surgeon must be properly recognised. Vets are regarded as the most influential advisors to farmers within the decision-making process²¹. They should be included within the development of the standards and monitoring to reflect this role as experts on animal health and welfare, and as trusted advisors on animal health and welfare planning, husbandry, biosecurity, biocontainment and preventative medicine.
6. Achieving the minimum standards should not be considered an aspiration for farmed animals. The ambition should be to encourage the highest standards and raise the bar at every level. Providing incentives and rewards for high achievers is important to continue raising standards and encourage improvements at all levels. This principle has shown to be effective in [Farming Connect](#) “champion” demonstration farms. A critical component in the success of this knowledge transfer programme is its role of sharing best practice and cascading information to the wider industry through a programme of high-profile demonstration site events and promotional tools.
7. 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

²¹ 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.

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.

- 8.** 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 partnership working between industry and government to tackle endemic disease and animal health and welfare challenges.
- 9.** 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.
- 10.** We would welcome the opportunity to work closely with the Welsh Government to expand upon these proposals.