

BVA response to Environment, Food and Rural Affairs Committee inquiry on Environmental Land Management and the agricultural transition

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, animal welfare, public health, regulatory issues and employment matters.
- 2) The veterinary profession is an integral part of the agricultural and food sectors. Veterinary surgeons provide preventive healthcare and treatment for livestock, as well as carry out surveillance, promote good biosecurity, promote high animal health and welfare and boost productivity. Official Veterinary Surgeons ensure food safety and enable trade in animals and animal products. The future of agricultural support is therefore of great interest to the veterinary profession.
- 3) We welcome the opportunity to provide evidence to this inquiry on the Environmental Land Management and the agricultural transition.
- 4) The relationship between a farmer and their vet is paramount when it comes to any effort improve animal health and welfare outcomes. A new Agricultural policy offers an opportunity to harness the power of this relationship and empower farmers and vets to collaborate to see positive outcomes on farm.

The Agriculture Act

- 5) On 11 November 2020, BVA welcomed news that the UK Agriculture Bill had become law.¹ The Agriculture Act largely functions as “enabling” legislation. It provides the government with the powers to allocate funds to agriculture and to intervene in the agriculture and food sectors. The Secretary of State is granted considerable discretion to regulate, determine interventions, and direct funding. The legislation enables a recalibration of the system of agricultural support in England, with a phased withdrawal of direct payments to farmers. The central principle of the new policy is that public money should support public goods that benefit producers, consumers, and wider society.
- 6) In 2017, BVA set out a veterinary vision for what agricultural policy should look like after the UK left the EU.² That document called for the concept of public goods to be at the heart of a new post Brexit agricultural policy to benefit producers, consumers, and wider society. Specifically, we urged for the use of public money to incentivise and support animal health and welfare outcomes as public goods.
- 7) We support the enshrining of the public money for public goods approach in legislation. We also welcome the specific inclusion of “protecting or improving the health or welfare of livestock” amongst the public goods which could receive financial support. It is welcoming to note consultation responses to the “Health and Harmony” consultation “showed that high standards of welfare are a priority for the public and the sector.”³

¹ <https://www.bva.co.uk/news-and-blog/news-article/veterinary-input-vital-as-agriculture-act-comes-into-law-says-bva/>

² <https://www.bva.co.uk/media/1179/bva-veterinary-vision-for-post-brex-it-agricultural-support.pdf>

³ Defra, The future for food, farming and the environment: policy statement (2020) Publish 25 February 2020 <https://www.gov.uk/government/publications/the-future-for-food-farming-and-the-environment-policy->

The Agricultural Transition

- 8) England has now entered an agricultural transition period.⁴ Changes for farmers will be phased in over seven years, starting in 2021. Over this time, Direct Payments will be reduced gradually, with the intention to give farmers the time to adapt to the changes. The government intends for the savings from phasing out these area-based payments to be invested in the roll-out of schemes to support public goods and help farmers to boost their productivity. Specific schemes outlined by the Government include:
- Environmental Land Management
 - Animal Health and Welfare Pathway
 - Grant support to help farmers maintain and improve productivity.
 - A new approach to farming regulation and enforcement
- 9) Of particular interest to the veterinary profession will be the establishment of the Animal Health and Welfare Pathway.

The Animal Health and Welfare Pathway

- 10) The Animal Health and Welfare Pathway maps out how farmers, vets and government will work together to deliver sustained improvement in animal health and welfare over time. We welcome that health and welfare are considered together within the pathway as the health and welfare of animals are intrinsically linked. The role of vets is central to the success of this endeavour, which has been recognised within the structures of the Pathway. BVA has held a seat on the steering group that is designing the Animal Health and Welfare Pathway since its inception.
- 11) There are three main components to the Pathway: health and disease support, capital grants, and a new payment-by-results approach.

Health and disease support

- 12) From 2022, the Pathway will provide support to control endemic disease. This will initially be focussed on the cattle, pigs and sheep sectors. There is a recognition that there is significant variation in where the sectors are starting, and which diseases will need to be prioritised. There will also be significant variation within sectors. BVA specialist divisions are working with their industry partners to co-design the approach needed in each sector.
- 13) We strongly support that a consistent theme across all sectors is that vets will be critical to unlocking health and welfare improvements. Defra is planning to financially support vet visits. Through these vet visits livestock farmers can collect better animal health data; create farm health and welfare management plans through diagnostic testing; receive farm-specific preventative advice and increased peer learning.
- 14) Policy needs to empower farmers to work together with their vet to tackle endemic disease. Strengthening collaboration between farmers and their private vets has the potential to be pivotal in achieving changes in farmer attitudes and decision making. Private vets are trusted advisors to farmers and uniquely positioned to offer advice and provide essential surveillance services which play a key role in the package of measures necessary to address endemic disease.

Capital Grants

- 15) In 2022, Defra plan to launch applications for both small and large capital grants with the first payments being made in 2022 and 2023 respectively. Grants will be used to co-fund investment in measures that will increase animal welfare above the legal baseline.
- 16) All livestock farmers in England would be eligible to apply. A vet visit may be required as part of the application process. The role of the vet would be to help in the identification of the key health

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⁴ <https://www.gov.uk/government/publications/agricultural-transition-plan-2021-to-2024>

and welfare needs on the farm and ensuring that livestock farmers are applying for items that will provide the expected benefits for health and welfare. The involvement of veterinary expertise is welcome here.

- 17) Careful consideration needs to be given to the role of the vet in practice. Measures to improve animal health and welfare on farm are strengthened when farmers and their private vets work together. Farmers see their private vet as a “reliable and trustworthy” source⁵. If vets are perceived by farmers to be policing the capital grants system this could undermine trust in the vet farmer relationship.

Payment-by-results

- 18) This is the element of the Pathway that is most lacking in detail at present. To clarify matters, Defra has commissioned a research project to determine how a payment-by-results approach would work. The researchers held their first round of stakeholder workshops at the end of 2020. The research aims to identify potential animal welfare enhancements and assess economic viability. Examples of enhancements that could be supported would be the provision of environmental enrichments or changes to confinement practices. This research will ultimately inform a proposed pilot in 2023.

Interconnected outcomes

- 19) Animal health and welfare is interwoven with many social, economic and environmental outcomes. We would caution against an approach which creates silos between animal health and welfare schemes and those that seek to increase productivity or improve the environment. Such an approach would fail to maximise the benefits of evident synergies.

Productivity

- 20) We welcome the financial assistance available to improve agricultural productivity. The veterinary profession plays a pivotal role in increasing productivity while ensuring animal health and welfare needs are met. We support the definition of productivity used within the legislation which emphasises quality and efficiency in production. Productivity is also closely linked with the delivery of animal health and welfare as well as environmental outcomes.
- 21) Schemes designed to assist productivity should incorporate animal health and welfare as improved animal health outcomes benefit productivity through efficiency. Improved health status, biosecurity and husbandry will also reduce disease risk leading to a more financially resilient sector. This was most clearly illustrated by the Foot and Mouth outbreak in 2001. This was 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, harmed the reputation of UK agriculture and caused a general election to be postponed. More recently, it is estimated that the Bluetongue vaccination programme in 2008 has saved £460 million and 10,000 jobs in the UK, not to mention countless animal lives.⁶ It is also important to recognise that fewer, healthier animals with better productivity have less of a negative impact on the environment at all levels compared to numerous animals with poorer health and welfare outcomes.
- 22) Agricultural policy should support animal health and welfare which underpins the reputation of UK agricultural produce. This reputation allows UK produce to add value to produce by marketing to discerning, value-added markets. Michael Gove MP, at the time Secretary of State for Environment, Food and Rural Affairs, stated that “high animal welfare standards and high environmental standards reinforce the marketability of our produce.”⁷

⁵ Maye D, Enticott G, Naylor R. Using scenario-based influence mapping to examine farmers’ biosecurity behaviour. *Land use policy*. 2017 Jul 1;66:265-77. doi: 10.1016/j.landusepol.2017.04.026

⁶ RCVS Research Subcommittee 2013 *Veterinary research in the UK: a snapshot*, 2013

⁷ Michael Gove MP, Secretary of State for Environment, Food and Rural Affairs noted this giving evidence to the House of Lords Select Committee on the European Union Energy and Environment Sub-Committee

Environmental Land Management (ELM)

23) The Environmental Land Management (ELM) scheme is described as “the cornerstone of the government’s new agricultural policy”.⁸ Through ELM farmers and other land managers may be paid for delivering environmental public goods. A weakness in the government’s approach has been considering environmental public goods and animal health and welfare public goods separately. However, the two can be mutually beneficial and should be integrated more closely. Examples include:

- Incentivising innovative whole farm management systems could integrate the delivery of environmentally beneficial outcomes as well as high quality animal health and welfare food products.
- Reduced antimicrobial use in livestock can lead to fewer antimicrobials being excreted and thus reaching the environment. This would reduce potential for Antimicrobial Resistance (AMR) transmission from livestock into ecosystems.
- To mitigate against climate change, advances in animal production and farming practices are necessary to increase efficiency while maintaining animal welfare.
- Anthelmintics are widely used to control gastrointestinal parasites of livestock. However, the residues of these compounds, particularly the macrocyclic lactones, are excreted in faeces, where they may have toxic effects on dung-colonising insects. A vet-directed parasite plan will allow production and animal health outcomes to be met alongside the protection of biodiversity.

24) An environmental benefit scheme on land where livestock is kept must include animal health and welfare considerations. 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. Using farmland to help with avoiding flooding is a welcome. However, if this is done without a consideration of animal health and welfare this could create significant fluke habitats which would endanger livestock and potentially increase anthelmintic use.

Veterinary capacity

25) The new schemes outlined above rely on collaboration between vets and farmers. They offer vets an exciting opportunity to renew their relationships with clients and work together to improve animal health and welfare outcomes on farm. An ambitious agriculture policy will not achieve its aims if there is insufficient veterinary capacity within farm animal practice.

26) Leaving the EU Single Market has increased demand for veterinary certification and supervision for goods including live animals, products of animal origin (POAO) and germplasm as well as pet animals and equines moving between Great Britain and the EU Single Market and between Great Britain and Northern Ireland. Additional veterinary capacity is needed to fulfil this demand.

27) UK veterinary practices have been experiencing difficulties recruiting. In November 2018 the Major Employers Group (MEG), which represents some of the largest UK veterinary businesses, estimated a veterinary workforce shortage of approximately 11.5%, based on vacancy rates. In recent years over half of the veterinary surgeons who register in the UK each year qualified elsewhere in the EU/EEA.

28) In February 2020 the government set out its plans for a new immigration system. Free movement has now ended as has the automatic registration of EEA qualified vets by the Royal College of Veterinary Surgeons as part of the Mutual Recognition of Professional Qualifications (MRPQ). In place of free movement is an employer-led points-based system which is likely to place a significant administrative and financial burden on veterinary businesses who will be required to sponsor recruits from outside of the UK. This new immigration system casts significant doubt

⁸ <https://www.gov.uk/government/publications/the-environmental-land-management-scheme-an-overview/the-environmental-land-management-scheme-public-money-for-public-goods>

over whether the profession will be able to fill the workforce gap created by the end of free movement when we are already struggling to recruit and retain vets.