BVA response to Scottish Government Agricultural transition - first steps towards our national policy: consultation

Who we are

1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the UK with over 18,000 members. BVA represents, supports and champions the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession.

2) BVA Scottish Branch brings together representatives of local veterinary associations, BVA's specialist divisions, government, and research organisations in Scotland. The Branch advises BVA on the consensus view of Scottish members on local and United Kingdom issues.

3) We are grateful for the opportunity submit a response to this consultation on the agricultural transition.

Introduction

4) The future of agricultural support is of great interest to the veterinary profession because veterinary surgeons play an integral part of the agricultural and food sectors.

5) 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 (OVs) ensure food safety and enable trade in animals and animal products. Veterinary Surgeons working in Government provide an important public service throughout the food chain from disease control to safeguarding animal health and welfare.

Animal health and welfare

6) In 2017, BVA set out a veterinary vision for what agricultural policy should look like after the EU membership referendum. 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) In our response to Stability and Simplicity: proposals for a rural funding transition period, we called on the Scottish Government to develop an agricultural policy which would “support animal health and welfare which underpins the reputation of UK and Scottish agricultural produce”.

8) The stated goal of the current consultation is to “support farmers and crofters to ensure their economic sustainability as we deal with the twin global emergencies of climate change and biodiversity whilst also continuing to produce high quality food.” It is disappointing to see insufficient weight being given to animal health and welfare within this aim. With increasing recognition that animal agriculture can be a contributor to environmental degradation, climate change, habitat loss and waste, changes in UK animal production and farming practices are necessary to increase efficiency of agriculture and mitigate environmental impact.

9) The interconnections between human wellbeing, animal wellbeing and environmental wellbeing are more pronounced than ever. A ‘One Health’ approach is critical to addressing health threats

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1 https://www.bva.co.uk/media/1179/bva-veterinary-vision-for-post-brexit-agricultural-support.pdf
in the animal, human and environment interface.\(^3\)

**10)** Animal health and welfare is interwoven with many social, economic, and environmental outcomes. We would caution against an approach which does not consider animal health and welfare alongside efforts to increase economic or environmental sustainability. Such an approach would fail to maximise the benefits of evident synergies. Agriculture cannot be considered sustainable if it is achieved at an unacceptable cost to animal welfare.

**11)** The economic contribution of improved animal health has been noted by the Scottish Government:

“it is estimated that veterinary interventions have significant economic impact through avoidable costs to the industry and taxpayer. The avoided costs attributable to veterinary services in Scotland for 30 endemic diseases of farm animals were estimated to be between £100m and £154m per annum. The avoided costs due to veterinary control measures stopping exotic disease outbreaks (FMD, Bluetongue and AI) were estimated at £135m per annum. Likewise, avoided costs from controlling and minimising outbreaks of BSE, salmonella, campylobacter and E.coli O157 were estimated at £96m per annum.”\(^4\)

**12)** There would be benefits with aligning the ambitions of the agricultural transition with the vision that is delineated in the Scottish Government’s Animal health and welfare in the livestock industry strategy.\(^5\) We support the holistic approach of the strategy which states:

“To achieve that strategic objective the Scottish Government has a vision of an agriculture industry that is dynamic, competitive and renowned for good quality, sustainable produce. It will strive to achieve that vision by promoting high welfare, healthy livestock produced by resilient systems with minimal environmental impact.”\(^6\)

**13)** The strategy is coming to the end of its life cycle. It will be vital to engage the veterinary profession in the development of a successor strategy that is aligned to the wider ambitions of agricultural policy in Scotland.

**Veterinary engagement**

**14)** Veterinary surgeons are uniquely placed to advise and influence sustainable animal husbandry practices at whole-system levels, safeguarding animal health and welfare and influencing sustainable future livestock and food production. No trade in live animals and animal products can take place without veterinary certification and veterinary surgeons are crucial in protecting public health (including food safety).

**15)** 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.

**16)** Thus, the involvement of the veterinary profession within any system of agricultural support should be an integral part of any policy development, review and implementation. It is disappointing that the document makes no mention of the role of the veterinary profession. Furthermore, an opportunity has been missed to capture from the outset the central role of veterinary expertise in increasing productivity, enhancing environmental protection, and improving resilience.

**17)** Engagement with the veterinary profession in the development of the policy has been limited to date. We would seek for this to be redressed. A first step would be ensuring appropriate

\(^3\) [https://www.euro.who.int/en/health-topics/health-policy/one-health](https://www.euro.who.int/en/health-topics/health-policy/one-health)


veterinary participation on the Agriculture Reform Implementation Oversight Board (ARIOB).

**Baselining**

18) As an evidence-based profession, we support underpinning policy interventions with appropriate data. Establishing baseline data to monitor the effectiveness of any intervention is a sensible first step.

**Animal health and welfare data**

19) We understand that this proposal is framed in terms of a “a Just Transition to a net zero economy” and that the focus of efforts will be to audit carbon, soil, and biodiversity. We would support the incorporation of animal health and welfare data within the baseline audit.

20) Improved animal health outcomes benefit productivity through efficiency. Therefore, collecting animal health data can act as a useful proxy or supplement for productivity data. Improved health status, biosecurity and husbandry will also reduce disease risk leading to a more financially resilient sector.

21) Research shows that “dealing effectively with endemic livestock diseases represents an opportunity to reduce emissions from the livestock sector, often without compromising productivity or farm economics.”7 Therefore, improving animal health data can act as a useful indicator for meeting environmental goals.

22) As the consultation document notes, a challenge will be to ensure that data collection will have value at the farm level in terms of driving profitability, productivity, and efficiency. One way to make data collection more usable for farmers would be to clearly establish the link between improving animal health and increased productivity for the farmer and meeting the environmental aims of the Scottish Government. This is because endemic disease control is a more tangible goal for farmers, with more direct benefits for the individual farmer. This is also a goal which would be built on the existing support of the vet-farmer relationship.

23) Collection of farm health data would also benefit national disease control efforts. Therefore, we support provision for farm-level health data to be shared and utilised nationally.

24) As a first step the Scottish Government should engage directly with the veterinary profession and industry to establish what health data should be prioritised for collection as part the baseline audit. BVA will be able to draw upon our experience co-designing the Animal Health and Welfare Pathway in England. BVA holds a seat on the Pathway steering group which is mapping out how farmers, vets and government will work together to deliver sustained improvement in animal health and welfare over time.

25) From Spring 2022 annual animal health and welfare reviews will take place in England. The Review is a fully funded vet visit which farmers will receive on a yearly basis. Farmers’ own vets will carry out diagnostic testing, collect data, and provide bespoke advice. The initial focus will be on improving disease prevention and controlling or eradicating an industry agreed list of diseases in each species. The vet is primarily there to support the farmer benchmarking data, but the data collected will be used to give a better understanding of the health and welfare of England’s national and regional herd and flock.

26) The specific data sources are being agreed between government, industry, and the veterinary profession on a sector-specific basis. From our involvement in the Pathway since 2018, it is apparent that there is significant variation in where the sectors are starting, and which data will need to be prioritised. There is also significant variation within sectors. However, a consistent theme across all sectors is that vets will be critical to utilising data to unlock health and welfare improvements.

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7 https://www.climatexchange.org.uk/media/2031/livestock_health_and_ghg.pdf
Greenhouse gases

27) When collecting baseline data to achieve a Just Transition in Scottish agriculture, it is important to accurately assess the global warming potential (GWP) of different greenhouse gases produced by animal agriculture and develop policies to mitigate these emissions accordingly. Research by International Panel on Climate Change (IPCC) scientists from Oxford Martin School, Oxford University has demonstrated that rather than treating all greenhouse gases with a ‘one-size fits all approach’, there are two distinct types of emissions, and they should be treated differently by using an adapted Global Warming Potential metric.

28) For example, carbon dioxide (from farm vehicles, buildings, equipment, imported feed) and nitrous oxide (primarily from artificial fertilisers) are long-living pollutants that persist in the atmosphere. Whereas methane (produced from livestock) is a short-living pollutant that reduces over time (over an approximate 10-year cycle), meaning that methane emissions will replace old emissions and have a neutral warming impact (as long as the number of UK livestock remains at the same level).

29) Climate change and agricultural policies should therefore be designed to reflect this difference. To affect the largest change, efforts should initially be focussed on reducing the long-living emissions that are produced by animal agriculture eg. carbon dioxide and nitrous oxide. However, the UK’s agricultural community must not lose sight of the fact that for methane to continue having a neutral impact, emissions must still fall, but only by 0.3% each year.

Capital grants

30) We would not support the limiting of grant support solely to the aim of reducing greenhouse gas emissions. Specifically, we would support the provision of grant support for animal health and welfare outcomes. Good animal health and welfare is paramount from farm-to-fork. Therefore, grants should support animal health and welfare as goals in and of themselves.

31) However, as noted above there are clear links between animal health improvement and reducing greenhouse gas emissions. Therefore, if grants are limited to the aim of reducing greenhouse gas emissions this should allow for animal health and welfare focused interventions.

32) We are aware that the degree to which different animal health and welfare intervention will impact greenhouse gas emissions is not clear. Therefore, we would support directing research funding to provide more clarity to this issue.

Biodiversity

33) As a health-centred profession and key stakeholder in the One Health agenda, we support the development of policies that 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. 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.”

34) Actions to enhance biodiversity should consider the benefits of effective use of parasiticide products. These products are commonly used in veterinary medicine to prevent and treat for various parasites, including fleas, ticks and worms. As well as preventing animal health and welfare problems, human health risks from associated zoonotic threats have to be considered.

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Recently, concerns have been raised that some of these medicines are contaminating the environment. Parasiticides could be reaching rivers through wastewater from premises where animals are kept, or from animals entering rivers. Parasiticides may also be excreted in urine and faeces and absorbed into soil. As parasiticides are harmful to a wide range of invertebrates, this could be highly detrimental to wildlife, ecosystems and biodiversity. This in turn could impact on public health. In the farm animal and equine sectors, there are concerns over high levels of resistance to parasiticide products as a result of misuse and overuse.

The use of anthelmintics must be judicious and incorporated within a farm specific strategic anthelmintic plan based on sound scientific principles, recognising that every application will increase the risk of possible development of resistance to anthelmintics. Incentivising veterinary engagement on farm to develop and implement such plans alongside farmers would be a tangible way to improve biodiversity on farm while maintaining animal health, animal welfare and public health.

**Just transition**

As noted above improving animal health and welfare can support the aims of a Just Transition to a net zero economy. As a One Health orientated profession we understand these can be mutually reinforcing aims. Consequently, a transition to a net zero economy offers opportunities for animal health and welfare. In fact, Scotland has led the way in establishing the wider benefits through the research of the Macaulay Development Trust with the James Hutton Institute.

In our One Health in Action report we note:

“A degraded environment will have a big impact on human and animal health and welfare. According to The Lancet, climate change is “potentially the biggest global health threat of the 21st century”. These negative health impacts will increase in frequency and severity if the temperature rise exceeds 1.5°C.”

As animal health and welfare are so interlinked with the Just transition to a net zero economy access to veterinary services are a key facilitator for that change. Consequently, poor access to veterinary services will be a barrier for farmers, crofters, and land managers. Therefore, continued support for the Highland and Islands Veterinary Services Scheme is essential for the Scottish Government's wider aims. The scheme is funded by the Scottish Government. Its aim is to ensure the provision of an adequate veterinary service to prevent and eradicate animal diseases for all animals kept for agricultural purposes and belonging to crofters and others of like economic status, where no other provisions are available on the market.

**Sequestration**

**Productivity**

**Defining productivity**

The veterinary profession plays a pivotal role in increasing productivity while ensuring animal health and welfare needs are met. It is important that a definition of productivity is found which emphasises quality and efficiency in production whilst supporting improvements in animal health and welfare. This is especially true if future support is dependent on demonstration of improvements in productivity levels on farm. We would caution against a definition of productivity which does not consider animal health and welfare alongside efforts to increase economic or environmental outcomes. Agriculture cannot be considered productive if it is achieved at an unacceptable cost to animal welfare.

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9 [https://www.bva.co.uk/media/3145/bva_one_health_in_action_report_nov_2019.pdf](https://www.bva.co.uk/media/3145/bva_one_health_in_action_report_nov_2019.pdf)

Incentivising health and welfare

42) Schemes designed to assist productivity should incorporate animal health and welfare as improved animal health outcomes benefit productivity through efficiency.

43) This is an area where Scotland has shown leadership and innovation. Scotland achieved Officially Tuberculosis Free Status (OTF) in September 2009 in recognition of the relatively low and stable incidence of TB found in Scottish herds. That freedom has allowed Scotland to lead in the development of new disease control programmes which has proven their benefits in terms of animal health and welfare as well as wider benefits.

44) For example, BVD, has several negative effects on the productivity of cattle herds, particularly those that have persistently infected animals. A paper produced by the Scottish Government notes, these negative effects include slow growth rates and susceptibility to other diseases as a result of immuno-suppression; increased mortality rates (as some affected animals will die); increased costs associated with caring for sick animals and decreased calving rates (by increasing the chance of abortion in pregnant animals, and death of new-born calves).

45) There are environmental improvements associated with eradicating BVD. Infected cattle are less productive; a herd with BVD produces less milk and/or meat per unit of greenhouse gas emitted than a healthy herd. If BVD is not present, milk and meat production is more efficient, meaning that there is likely to be an environmental benefit associated with BVD eradication.

Incentivising farm planning

46) Scotland should build on its success in designing animal health programmes and create a future farming policy around this strength.

47) We would strongly support any incentive for farm plans targeting flock and herd health. The veterinary profession plays a pivotal role in increasing productivity while ensuring animal health and welfare needs are met. We would support engagement on the development of such an incentive. BVA, BVA Scottish Branch, and BVA specialist divisions are prepared contribute to the design of an ambitious incentive. A farm health plan is an ongoing process of incremental improvement over time - it is not a one-off event. Therefore, incentives must meaningfully support long term engagement between farmers and their vets.

48) Key to achieving this aim will be building successful vet farmer collaboration. Measures to improve health on farm are strengthened when farmers and their private vets work together. Farmers see their private vet as a “reliable and trustworthy” source and also understand the importance of local knowledge and familiarity with specific localised situations on a particular farm. Farmers recognise that private vets can provide tailored advice due to their knowledge of a particular farm or cattle herd. Consequently, strengthening collaboration between farmers and their private vets has the potential to be pivotal in achieving changes in farmer attitudes and decision making.

49) As noted above meaningful benchmarking data will be essential to evidence improvements.

Research & Development

50) To ‘future-proof’ our food system consideration should be given to the use of public funds to

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incentivise innovation, technology and new processes which can support animal health and welfare whilst optimising productivity and supporting a Just Transition.

51) The veterinary profession has considered the role of innovation in the Vet Futures report13 and Action Plan14. As a profession, vets take advantage of progress in scientific knowledge, innovation and technology to advance animal health and welfare, and challenge the status quo to drive continuous improvement. At the same time, we are alert to the impact of new technologies on animal health and welfare – and insist on robust ethical appraisal before new technologies are introduced.

52) The veterinary profession plays a pivotal role in driving innovation while ensuring animal health and welfare needs are met. Government should give priority to incentivising innovation, technology and new processes which can support animal health, animal welfare and public health whilst optimising productivity and competitiveness.

53) Veterinary researchers are addressing some of the biggest social and economic problems of today, including:

- Climate change
- Inefficiencies in the food-chain;
- National food security, ensuring that indigenous food industries are competitive;
- Prevention of animal disease, zoonotic or otherwise;
- Antimicrobial resistance;
- Improving food animal welfare;
- Conservation of wildlife;
- Improving companion animal and equine health and welfare.

54) Epidemiology is central to the understanding of disease and how different interventions and controls affect these. The evidence provided by epidemiological research underpins the government policy, veterinary advice and industry action. Government should support innovative epidemiological research, to further our understanding of disease.

55) Investing in veterinary innovation makes economic sense and there are excellent examples from Scottish Universities to support this. In fact, in January 2020, the Scottish Government published Veterinary profession’s value to Scotland: preliminary economic assessment which details numerous contributions by Scotland’s veterinary research to animal health, welfare, public health, environmental and economic outcomes as well as public finances such as the example below:

“Bovine TB (REF, 2014a). A University of Glasgow bovine tuberculosis (bTB) surveillance model was fundamental to new Scottish Government policy on bTB testing. Implemented on 1st January 2012, the policy change used the Glasgow model to indicate which cattle herds can be exempt from routine testing while still maintaining Scotland’s official bTB free status. In 2012 this translated to exemption of more than 30% of Scottish herds from routine testing, with an associated government saving of £150,000. The revised policy also provided savings to the Scottish farming industry in the region of £100,000 (2012) and limited the risks of bTB testing to farmers, veterinarians and cattle. The rapid success of the ground-breaking Scottish research-led bTB policy development has been highlighted by the Civil Service as best practice and has been presented to numerous policy audiences including the European Commission, providing the opportunity to transform industry practices and livestock surveillance policy across the UK.”

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56) A report commissioned by the Department for Business, Innovation and Skills (BIS) found that in 2012/13 research and development income for veterinary science totaled £55m. Agriculture, forestry and veterinary science research is singularly adept at leveraging public sector funding to attract additional private sector finance that otherwise would not have occurred, as can be seen in the below graph.

57) A successful innovation strategy will encourage the sharing of expertise from multiple disciplines to better understand the factors behind our most pressing problems and identify new opportunities. Research in the social sciences provides insight into decision making. The prominence of social science research within animal health policy design is growing. Greater application of social science concepts and findings should form a central aspect any agri-food strategy.

58) We would specifically support further research to strengthen the evidence base for the contribution of endemic disease control to greenhouse gas mitigation.

Knowledge & Skills

59) In the Vet Futures report, the veterinary profession recognised there is value attached to technology and innovation. There have been significant developments in recent years in the areas of: genomic sequencing, big data, pen-side testing and other diagnostic tools, drones, genetically modified organisms, and social media. Vets are already embracing opportunities to create new services, improve the efficiency of, and access to, existing services, deliver quality information to clients and the broader public, and to share learning.

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16 Department for Business, Innovation and Skills, What is the relationship between public and private investment in R&D? 2015

17 Department for Business, Innovation and Skills, What is the relationship between public and private investment in R&D? 2015, 215

60) Equally as important as commissioning innovative research, is the dissemination of research and new learning from researchers into innovative practice on farm. Encouraging early adoption and a culture of evaluation will allow Scotland to be a testbed for new technologies. The role of the private vet will be essential to advise any farmer involved in early adoption, to collect data and ensure animal health and welfare are maintained.

61) Vets are the trusted advisors to farmers and uniquely positioned to offer the advice that supports the uptake of innovative approaches. There should be greater utilisation of behavioural approaches to encourage the application of the findings of innovative research into practice.

62) Vets also play a vital role in critically appraising new technologies and techniques to understand where these may have negatives effects on animal health and welfare and should be avoided. They are also capable of working with their farmers to put in place solutions to mitigate any potential negative impacts of new technology whilst realising the benefits.

63) Vets 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 Farming19. Within a future post-CAP agriculture policy, we would welcome the use of grants or pilot schemes to trial the use of innovative technologies to improve animal health and welfare.

64) This is an opportunity to exploit the existing network of organisations with an interest in encouraging the adoption of innovation, new farm management practices and technology transfer from the lab to the field. This ecosystem includes Scotland’s vet schools as well as institutions such as SRUC, the Macaulay Development Trust and the James Hutton Institute.

65) We welcome efforts to incentive education, CPD and knowledge exchange with the aim of professionalising the agricultural sector.

Supply Chains

66) Policy should 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.

67) 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 safeguards in assurance schemes as a tool to drive continuous improvement of animal management and husbandry practices, in turn promoting high animal health and welfare.

68) BVA believes that 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. 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.20

Conclusion

69) Scotland has an exciting opportunity to develop an innovative agriculture policy which supports an ambitious set of aims. We would ask that as the policy is developed further, more recognition

20 British Veterinary Association, Vets speaking up for animal welfare BVA animal welfare strategy, 2016
is given to animal health and welfare. As noted throughout this response, improved animal health and welfare would underpin the stated aims of the consultation document.

70) The involvement of the veterinary profession within any future agricultural policy will be vital to all aspects of policy development, review, and implementation. BVA and BVA Scottish Branch are well placed to support the Scottish Government in the development and implementation of a new agricultural policy and would welcome further engagement.