

# BVA Response to Defra Consultation on the Animal Health and Welfare Pathway: Mandatory Proposals.

## About you or your organisation

The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

## Questions on the mandatory Animal Health and Welfare Review (AHWR)

Please indicate your level of agreement with the following statements

**Question 11 a. For cattle, a mandatory AHWR in England should be introduced, in addition to the animal health visit requirements in the Animal Health Law.**

Strongly agree – **Agree** – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 11 b. For sheep, A mandatory AWHR in England should be introduced, in addition to the animal health visit requirements in the Animal Health Law.**

Strongly agree – **Agree** – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 11 c. For pigs, a mandatory AWHR in England should be introduced, in addition to the animal health visit requirements in the Animal Health Law.**

Strongly agree – **Agree** – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 11 d. If you have answered “disagree” or “strongly disagree” to any of the questions above, please explain why**

We support the concept of such visits provided they don't duplicate other vets visits or data collection.

**Question 12 a. Farms with fewer than 11 cattle should be exempt from the mandatory AHWR, which is over and above the animal health visit required by the Animal Health Law.**

Strongly agree – Agree – Neither agree nor disagree – Disagree – **Strongly disagree** – Don't know

**Question 12 b. Farms with fewer than 101 sheep should be exempt from the mandatory AHWR, which is over and above the animal health visit required by the Animal Health Law.**

Strongly agree – Agree – Neither agree nor disagree – Disagree – **Strongly disagree** – Don't know

**Question 12 c. Farms with fewer than 51 pigs should be exempt from the mandatory AHWR, which is over and above the animal health visit required by the Animal Health Law.**

Strongly agree – Agree – Neither agree nor disagree – Disagree – **Strongly disagree** – Don't know

**Question 12 d. If you have answered “disagree” or “strongly disagree” to any of the questions above, please explain why**

The first two aims of the scheme are to identify and control the spread of disease, and to encourage regular engagement between farmers and their vets. Exempting smaller farms undermines both of these objectives, dangerously so in the case of disease prevention, which cannot be done successfully if some groups of animals are going unobserved. In terms of successful disease eradication, the whole national herd need to be involved otherwise there would be a possibility of leaving some disease in the smaller herds therefore making true eradication impossible.

Smaller herds/flocks clustering together, perhaps sharing common grazing, could be more likely to spread disease to neighbouring holdings than large, isolated units. Isolation and management measures may be harder to implement effectively on smaller holdings therefore population health advice is necessary.

Furthermore smaller farmers often receive less veterinary input and health, husbandry and welfare planning support through other mechanisms (less likely to be in assurance schemes for example). They are less likely to have the time and resources to engage in in-depth health planning without support, and therefore it is even more important that they are included in the mandatory proposals.

There is scope to adjust the requirements to make a lighter touch version for smaller herds – which focusses on the key health and welfare aspects: disease, responsible use of medicines, husbandry, and welfare which are the key factors for the farmers themselves, and the ones that have the most impact on neighbours if they are neglected.

**Question 13 a. As part of the AHWR, there should be a requirement to provide some information to Defra on (select all that apply)**

- Health
- Welfare
- Antibiotic usage
- Vaccine usage
- Anthelmintic (wormer) usage
- None of the above
- **Other**

**Question 13 b. If you have selected “none of the above” or “other”, please specify which information should be provided.**

The data is very specific and useful in the individual farm context, for the benefit of reviewing, monitoring and measuring for on farm animal health and welfare improvements. Due to the huge variation and caveats in baseline data, farm systems, management systems and seasonal climate effects on disease and treatments, we need more information about what data will be collected and how it will be used to ensure there is benefit to the farmer, vet, and as a national monitoring tool.

Antibiotic usage is the only aspect of the above list that can currently provide an indication into the overall national picture, important for trade and comparisons against other countries. With more clarity on why this data is important and how it is going to be used, we could potentially support collection of anthelmintic and vaccine usage data.

**Question 14 a. Some information on the following topics should be accessible to registered users of the secure movements database at an aggregated level for benchmarking purposes and to facilitate greater transparency when buying and selling animals.**

(Please select all that apply)

- **Health (aggregated basis for benchmarking)**
- **Welfare (aggregated basis for benchmarking)**
- **Antibiotic usage (farm level for sheep and pigs and on an individual basis for cattle)**
- Vaccine usage (including at an individual animal level for BVD, and at an individual level for PRRS in breeding pigs or a batch level for non-breeding pigs)
- Anthelmintic (wormer) usage (aggregated basis for benchmarking)
- None of the above

**Question 14 b. Please share any additional comments you may have on the specific information which is proposed to be shared with Defra for each species.**

In principle, accurate and reliable information on the points raised in questions 13 and 14 would be highly valuable for health and performance benchmarking. However, it is crucial that any data shared is of high quality to avoid the risk of disseminating poor-quality information. As well as anthelmintic usage, it would be more useful to know resistance status. However, care is needed with how that has been identified and for which species of parasite. The data should only be accessible if the value is open to interpretation

We are open to further discussions regarding the potential benefits of collecting such information. To ensure the process is meaningful, we would need clarity on the intended purposes and end uses of the data. We would also want to be involved in conversations about the potential unintended consequences, such as the use of crude metrics that might encourage perverse incentives or lead to misinterpretations, which could ultimately harm animal health and welfare.

## Questions on the mandatory annual flock health plan

Please indicate your level of agreement with the following statements

**Question 15 a. A mandatory annual flock health plan should be introduced for sheep in England.**

Strongly agree – Agree – **Neither agree nor disagree** – Disagree – Strongly disagree – Don't know

**Question 15 b. If you have answered “disagree” or “strongly disagree”, please explain why**

Potentially agree, but the justification for an additional vet visit must be discussed. It must add value to existing visits carried out for e.g. a VAN or farm assurance. Is the additional cost to be borne by the farmer?

**Question 16 a. Farms with fewer than 101 sheep should be exempted from carrying out a flock health plan.**

Strongly agree – Agree – Neither agree nor disagree – **Disagree** – Strongly disagree – Don't know

**Question 16 b. If you have answered “disagree” or “strongly disagree”, please explain why**

As at q12, the health of smaller flocks is still essential for disease prevention, to tackle antibiotic and parasiticide resistance, and for wider health and welfare. It may be enough to focus on these elements for smaller farmers if the full plan is felt to be disproportionate.

**Question 17 a. The following topics should be required elements in the Flock Health Plan**

Select all that apply

- **Biosecurity**
- **Infectious disease priorities**
- **Flock health performance**
- None of the above
- **Other**

**Question 17 b. If you have selected “none of the above” or “other” please explain why and specify any additional topics that you think should be required.**

Parasite management should be included as it is essential for health and welfare, and for preventing overuse of parasiticides and the associated resistance and environmental impacts thereof. The BVA [policy on responsible use of parasiticides in grazing animals](#) states that farmers and vets should “include structured, bespoke detail in health plans as a standard part of a holistic parasite control plan, ideally funded through the Animal Health and Welfare Pathway in England and its equivalents in the Devolved Nations as they are implemented, or from SFI payments.”

Vaccine usage could also be useful in the face of a disease outbreak.

**Question 18 There should be a requirement for a parasite control plan to be included as part of the flock health plan.**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 19 a. There should be a requirement to share data from the parasite control plan with Defra for the purposes of improving knowledge of wormer effectiveness nationally.**

Strongly agree – Agree – Neither agree nor disagree – **Disagree** – Strongly disagree – Don't know

**Question 19 b. Data from the parasite control plan should be made available in aggregated form to registered users of the secure movements database for benchmarking purposes.**

Strongly agree – Agree – Neither agree nor disagree – **Disagree** – Strongly disagree – Don't know

## Questions on the mandatory Bovine Viral Diarrhoea (BVD) eradication programme

Please indicate your level of agreement with the following statements

**Question 20 a. A mandatory BVD eradication programme should be introduced for cattle in England.**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 20 b. If you have answered “disagree” or “strongly disagree”, please explain why:**

**Question 21 a. To improve estimates of the prevalence of BVD in the English herd, all test results should be submitted to Defra by: (Please select all that apply)**

- The vet
- **The lab**
- None of the above
- Other

**Question 21 b. If you have answered “none of the above” or “other”, please explain why.**

**Question 22. The approach of identifying and removing persistently infected (PI) animals is the most appropriate approach to the eradication of BVD.**

Strongly agree – **Agree** – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 23 a. The requirement to start a PI hunt within 30 days of a positive antibody test result is:**

- Too long
- **Just right**
- Too short

**Question 23 b. If you have selected too short OR too long, please select an appropriate timescale:**

- Within 7 days
- Within 10 days
- Within 20 days
- Within 40 days
- Other

**Question 23 c. If you have answered “other”, please explain why.**

**Question 24 a. The requirement to complete a PI hunt within a week once initiated is:**

- Too long
- Just right
- **Too short**

**Question 24 b. If you have selected too short OR too long, please select an appropriate timescale**

- within 3 days
- within 5 days
- within 10 days
- within 14 days
- **Other**

**Question 24 c. If you have answered “other”, please explain why.**

We support a deadline on completion of a PI hunt in a timely fashion. We feel that the deadline needs to work around a particular herd situation influenced and managed by collaboration between the private veterinary surgeon and the lab carrying out the testing. We feel we need more information on the exact criteria for declaring a herd “not negative” and the detail on sanctions and/or potential additional funding linked to this in order to answer this question properly.

**Question 25. Movement restrictions should be placed on herds with animals that test positive for BVD virus until any PI animals are identified and removed.**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 26. The farm of birth of a PI animal must conduct a PI hunt if they have not done so since the birth of the PI animal**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 27. The dam (mother) of a PI animal must be virus tested.**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 28 At the point of sale, BVD status should be available at: (Please select all that apply)**

- **Herd level**
- **Individual level**
- None of the above

**Question 29. BVD status should be available to those with access to the secure movements database.**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 30 a. Vaccination data for individual cattle should be (Please select all that apply) -**

- Recorded on the secure movements database
- Visible to registered users
- **None of the above**
- Other

**Question 30 b. If you have answered “none of the above” or “other”, please explain why.**

We support vaccination as a method of controlling BVD at herd level, but vaccination is not a guarantee of BVD status at individual level, therefore this information would not be useful. For example, a PI could have been vaccinated after birth, or vaccination could have been improperly administered. Antigen status of an individual animal is a better guarantee of BVD status than vaccination status (with the caveat that a live vaccine could give a positive antigen test).

**Question 31. There should be a requirement for a mandatory annual biosecurity assessment and plan.**

Strongly agree – **Agree** – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 32 a. An adapted set of rules should be followed by**

(Please select all that apply)

- Herds of 10 or fewer cattle
- **Finishing units where 99% or more of the animals are not born on the farm**
- None of the above
- Other

**Question 32 b. If you have answered “none of the above” or “other”, please explain why**

**Question 33 a. Non-approved or non-licenced finishing units should retain access to green livestock markets in year 1 with no additional testing, and in year 2 provided they have a negative annual check test or are sending animals which are individually tested and negative. From year 3 onwards, only animals with individual negative status should go to green markets.**

Strongly agree – Agree – Neither agree nor disagree – **Disagree** – Strongly disagree – Don't know

**Question 33 b. If you have answered “disagree” or “strongly disagree”, please explain why**

We would require further detail and definitions within this question in order to answer. Antibody check testing is not appropriate in finishing units of any description. We support individual BVD virus testing of animals from finishing herds before they are able to be sold at green markets.

## **Questions on the mandatory Porcine Reproductive and Respiratory Syndrome (PRRS) eradication programme**

Please indicate your level of agreement with the following statements.

**Question 34 a. A mandatory PRRS control and eradication programme should be introduced for pigs in England.**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 34 b. If you have answered “disagree” or “strongly disagree”, please explain why.**

**Question 35. There should be some mapping available to show the PRRS status of farms to inform movement choices.**

Strongly agree – **Agree** – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 36 a. The timescales for the phases of the scheme are appropriate.**

Strongly agree – Agree – Neither agree nor disagree – Disagree – Strongly disagree – **Don't know**

**Question 36 b. If you answered “disagree” or “strongly disagree”, please specify an appropriate timescale with supporting evidence**

Timescale must allow industry to adjust to movement restrictions without culling or causing welfare issues.

**Question 37. There should be a requirement for a mandatory annual biosecurity assessment and plan.**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 38 a. All test results must be submitted to Defra to improve estimates of PRRS in the English herd.**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 38 b. If you have answered “disagree” or “strongly disagree”, please explain why**

**Question 39 a. Vaccination data for piglets and sows should be (Please select all that apply)**

- **Recorded on the secure movements database**
- **Visible to registered users**
- None of the above
- Other

**Question 39 b. If you have answered “none of the above” or “other”, please explain why**

**Question 40. The supervising vet should allocate or update a herd antibody or virus**

**status, based on all testing.**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 41. Herd level PRRS status should be available to registered users of the secure online movements database.**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 42. From Phase 3 onwards, all farms with more than 51 pigs, or those who want to send pigs to other farms and markets should produce a PRRS control plan with their vet.**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 43. From Phase 3 onwards, PRRS virus positive farms and unstable farms should have to implement their PRRS control plan.**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 44. In Phase 4, pig units with 51 or more sows, or 601 or more growing pigs, should not be permitted to move within 0.5km of a boundary of another pig unit of 51 or more sows.**

Strongly agree – **Agree** – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 45. In Phase 4, PRRS virus positive pigs should not be permitted to move within 1km of a boundary of a unit producing piglets.**

Strongly agree – **Agree** – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 46. In Phase 4, PRRS virus positive pigs should not be permitted to move within (Please select all that apply)**

- 3km of a boundary of gilt maiden unit (GMU).
- 3km of a gilt development unit (GDU).
- None of the above

**Question 47. In Phase 4, Herds with recurrent PRRS reinfections in quarterly tests should receive enhanced veterinary oversight including additional testing and review of their biosecurity.**

Strongly agree – **Agree** – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 48. To minimise the risk of spreading the virus, hauliers and other farm visitors, such as delivery drivers, should move from negative to positive farms on their routes.**

**Strongly agree** – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

**Question 49. In Phase 5, PRRS virus positive pigs should not be permitted to move with 3km of a boundary of a unit producing piglets.**

Strongly agree – Agree – Neither agree nor disagree – Disagree – Strongly disagree – Don't know

## Compliance and Enforcement

**Question 50 a. In cases of non-compliance which of the following actions might be appropriate (Please select all that apply).**

- Movement restrictions
- **Issuing of penalty notices**
- Other
- No action should be implemented

**Question 50 b. If you have selected “No action should be implemented” OR “other” please explain your answer**

Movement restrictions have the potential to create a welfare issue as pig flow would be interrupted. This could have detrimental effects on other sites that do not require restrictive measures. Careful management of movements would be necessary to balance this against the risk of disease spread.

Penalty notices should be graduated to the severity of the offence, and effectively enforced.

## Estimated Impact of Proposals

**Question 51. Please provide any comments or evidence you feel should be considered concerning the socio-economic impact the proposed policy may have on both producers and consumers.**

We understand the challenges of collating medicine usage information. Medicine Hub has been largely unsuccessful to date and that initiative was asking for less information (overall) than this proposal. However we strongly support and encourage the alignment of industry initiatives around medicine usage collation and understand the importance of sharing aggregated data with respect to international trade. For this proposal to be successful, long term commitment from government, industry and collaboration between the devolved nations, is fundamental.

We are concerned about the capacity of the current veterinary industry to all the testing that may be required for mandatory BVD control (which we support). We feel it imperative that some blood testing would be able to be carried out by veterinary technicians as part of a vet-led team. Likewise, sheep vets are concerned at capacity to manage a surge in good quality flock health planning, despite increasing provision of specialist training for sheep vets. Again, for pigs, the majority of units farrow multiple times a year. Six weekly testing prior to farrowing requires a lot of veterinary resource. There are also practical challenges around blood sampling outdoor sows before farrow, and a risk of abortion in heavily pregnant sows.

Enforcement without the ability to demonstrate outcomes forms a significant barrier and often leads to misrepresentation and inaccurate information, alongside resentment and distrust. In this case we are concerned that the mandating for flock health planning with no explanation of reason and clear aims will discourage farmers from embarking upon the process, further distrust in Government and in the worst case distrust of their vets.

Current import requirements do not require PRRSv testing as a compulsory component. Any control/elimination or eradication would require a review of the need to include PRRS testing as part of the mandatory import criteria for live animals and germ plasm in particular.

## General comments

**Question 52. Please share any other comments you would like to make on any of the proposals detailed in this consultation.**

A competent database is essential for this legislation proposal. This database needs to be usable by all devolved nations so that cross recognition of cattle and their BVD status can occur when cattle are moved across borders. We understand that it may be possible for English herds to use "ScotEid".

We would have concerns about some herds being declared BVD negative as a result of a single annual check test. In this regard we support the full CHeCs rules on BVD accreditation.