BVA RESPONSE TO NORTHERN IRELAND FUTURE AGRICULTURAL POLICY FRAMEWORK

Who we are

1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 17,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom’s veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters and the wellbeing of the profession.

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

3) We welcome the opportunity to respond to ‘Northern Ireland Future Agricultural Policy Framework.’

Introduction

4) The veterinary profession is an integral part of the agricultural and food sectors. Veterinary surgeons, working collaboratively with others, protect animals, people and the environment they share. Veterinary surgeons provide preventive healthcare and treatment for livestock, as well as carry out surveillance, promote good biosecurity, promote high animal health and welfare, undertake research and development, and optimise food productivity and sustainability.

5) Veterinary surgeons negotiate, draft and uphold necessary legislation and international standards as well as the care of animals and their clients. By carrying out surveillance and enforcement from farm to-fork, Authorised Veterinary Inspectors (AVIs) certify the trade in animals and animal products thus contributing to economic prosperity and the sustainability of food production. The future of the Northern Ireland agri-food sector is therefore of great interest and importance to the veterinary profession.

6) Brexit provides the opportunity to develop a strong, competitive and innovative food industry which enjoys the confidence of customers at home and abroad. A new agricultural policy should be both ambitious and focussed on delivering outcomes.
7) BVA recognises the specific context of farming in Northern Ireland. Of the four constituent parts of the UK, Northern Ireland is most reliant on agriculture in terms of the share of Gross Value Added (GVA) and percentage share of total employment. Conversely, however, Northern Ireland also has the smallest average farm size within the UK. Northern Ireland farmers are more dependent on direct payments than their counterparts elsewhere in the UK. It has been estimated that EU subsidies make up between 50 and 60 per cent of farm income in the UK. However, it is estimated, within the consultation document, that this provides 83 per cent of total farming income in Northern Ireland.

8) It is therefore understandable that the future agriculture policy framework would place a strong emphasis on increasing the productivity and resilience of the sector. We welcome provision to improve agricultural productivity and resilience. However, the role the veterinary profession plays in increasing productivity and resilience, while ensuring the animals’ physical and mental needs are met, is overlooked within the framework.

9) It is disappointing to see animal health and animal welfare largely overlooked by the future framework document, with no mention of the role of veterinary surgeons. This is in contrast with the ambitious system of public money for public goods that has been taken forward in England, where animal health and animal welfare are explicitly listed to receive financial support.

10) Below we propose changes within the Northern Ireland Future Agricultural Policy Framework where opportunities exist to incorporate animal health and welfare outcomes more explicitly.

**Transitional Agricultural Support Regime, 2019-2021**

11) DAERA will seek to maintain the status quo until 2021, enabling it to continue to implement the Direct Payment schemes as if they were still operating under EU rules. This is understandable within the current context of considerable uncertainty about future trading relationships with the EU and other countries.

12) Agriculture, as a sector, is particularly exposed to any disruption in trading relationships with the EU and other countries. Any requirement for veterinary checks on animals and products of animal origin at ports or at the land border could reduce the efficiency of produce moving to European markets and place additional administrative costs upon farmers. This uncertainty means it will be difficult to assess the full impact of the withdrawal of direct payments to farm incomes at this time.

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1 House of Commons Library, EU Referendum: Impact on UK Agriculture Policy, 2016
13) More challenging will be determining the impact on the wider rural economy that deliver
goods and services to farms. Farm animal veterinary practices represent an important
service sector to livestock farmers, and act as means to detect disease and enforce
animal health and welfare legislation.

14) Therefore, we welcome the plan to provide a period which aims to provide farmers with
stability and confidence to invest in their businesses and thereby deliver public benefit.
While a period of stability is welcome, where there is scope for improvement this
should be exploited. This time should also be used to develop and trial an ambitious
new agricultural policy that is focussed on delivering outcomes.

**Cross-compliance**

15) Cross compliance is made up of ‘Statutory Management Requirements’ (SMRs) and
standards for ‘Good Agricultural and Environmental Conditions’ (GAECs). The majority
of SMRs focus on issues of animal health, animal welfare, public health and food
safety – all of which are of the utmost importance to the veterinary profession. It will be
essential that there is no downgrading in what is expected in relation to animal health,
animal welfare, public health and food safety:

- SMR 1. Protection of Water against Nitrates Pollution
- SMR 2. Conservation of Wild Birds
- SMR 3. Conservation of Natural Habitats and of Wild Flora and Fauna
- SMR 4. Food and Feed Law
- SMR 5. Restrictions on the Use of Substances Having Hormonal or Thyrostatic
  Action and Betaagonists in Farm Animals
- SMR 6. Pig Identification and Registration
- SMR 7. Cattle Identification and Registration
- SMR 8. Sheep and Goat Identification and Registration
- SMR 9. Prevention, Control and Eradication of Transmissible Spongiform
  Encephalopathies (TSE)
- SMR 10. Restrictions on the Use of Plant Protection Products
- SMR 11. Minimum Standards for the Protection of Calves
- SMR 12. Minimum Standards for the Protection of Pigs
- SMR 13. Protection of Animals Kept for Farming Purposes
16) Moving forward, there is the opportunity to improve upon the compliance regime. It should be predominantly based on outcome safeguards and done in a meaningful way. An outcomes approach should be utilised as a tool to drive continuous improvement of animal management and husbandry practices, thereby promoting high animal health and welfare.

17) A welfare outcome safeguards approach contributes to informed considerations of the advantages and disadvantages of different production systems, assisting producers and consumers to consider how well a production system holistically meets all of an animal’s health and welfare needs. Indicators of positive welfare should be incorporated into welfare outcome assessments when possible, as promoted by the Farm Animal Welfare Committee (FAWC)’s “good life” framework.

18) Behavioural opportunity for animals can be a key differentiator between some assurance schemes, which is linked to the potential for good animal health and welfare when delivered with excellent health and welfare outcomes. The standardised assessment of health and welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct assessment.

Agricultural Policy Framework Beyond 2021

Productivity

19) The productivity of farm businesses is linked to the health and welfare of livestock. Support for productivity should be linked to health and welfare outcomes and designed to support improvements in standards. Improved animal health outcomes benefits productivity through efficiency. Improved health status, biosecurity and husbandry will also reduce disease risk leading a more financially resilient sector.

20) Disease outbreaks and the measures to control them can carry wide and costly consequences for public health, the economy and the environment. These impacts are substantial; across the UK, the Foot and Mouth outbreak in 2001 is estimated to have cost £5 billion to the private sector and £3 billion to the public sector, damaged the lives of farmers and rural communities and caused a general election to be postponed. Compensation and testing costs in the current Northern Ireland bTB programme will reach almost £40 million in 2017/18.

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2 British Veterinary Association, BVA Position on Farm assurance schemes, 2017
3 National Audit Office (2002), The 2001 Outbreak of Foot and Mouth Disease
4 DAERA, (2017) Consultation on the Department’s Response to the TB Strategic Partnership Group’s Recommendations to Eradicate Bovine Tuberculosis (bTB) in Northern Ireland,
21) The continuous monitoring of new and emerging disease through data collection, analysis and sharing across species provides high-quality intelligence on animal health and welfare that enables policy makers, veterinary professionals and animal keepers to take decisions to improve animal health and welfare and therefore productivity. A robust surveillance system is integral to the realisation of the high value outputs of Northern Ireland’s £1 billion plus export-reliant livestock industry.

22) BVA has produced a detailed policy position on veterinary scanning surveillance which outlines our vision for animal health and disease monitoring post Brexit⁵. This forms Annex A of this submission. 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
- 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.

23) 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 their lives.

24) Michael Gove MP, Secretary of State for Environment, Food and Rural Affairs, has stated that “high animal welfare standards and high environmental standards reinforce the marketability of our produce.” Therefore, agricultural policy should support animal health and welfare which underpins the reputation of Northern Ireland’s agricultural exports. This reputation allows Northern Ireland farmers to add value to produce through the by marketing to discerning, value-added markets.

Science and Innovation

⁵ British Veterinary Association (2018), Position on veterinary scanning surveillance (animal health and disease monitoring)
25) Public money should be used ambitiously. Priority should be given to incentivising innovation, technology and new processes which can support animal health and welfare whilst optimising productivity and competitiveness.

26) We recognise the role of new technologies and innovative methods in monitoring animal health and welfare outcomes, addressing animal health and welfare conditions and optimising the contribution of each animal to agriculture systems such as Precision Livestock Farming\(^6\). We would welcome the use of grants or pilot schemes to trial the use of innovative technologies to improve animal health and welfare outcomes within a new agricultural policy.

27) This is an opportunity to exploit the existing ecosystem 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 includes organisations such as Further Education (FE) Colleges, CAFRE, Queens University and Ulster University, AFBI and Catalyst Inc. Encouraging early adoption and a culture of evaluation will allow Northern Ireland to be a test-bed 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.

**Agricultural Education and Knowledge Exchange**

28) We welcome efforts to incentive education, CPD and knowledge exchange with the aim of professionalising the agricultural sector. In this arena Northern Ireland has been ahead of other parts of the UK, starting early with the availability of a GCSE in Agriculture and Land Use. There is also a framework providing high quality higher and further education across FE Colleges, CAFRE, Queens University and Ulster University. This is an opportunity to capitalised upon this existing structure.

29) Investment in measures which make achieving desirable outcomes and compliance with basic standards easier would be beneficial. For example, investment in a well-conceived programme of CPD for farmers has the potential to positively impact many areas of concern, including animal health and welfare, AMR, productivity and carbon usage.

30) Private veterinary surgeons are trusted advisors to farmers and uniquely positioned to offer advice and work closely with farmers and animal keepers to counsel and signpost

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to the appropriate course of action. Veterinary involvement ensures biosecurity measures are formulated, implemented and health and disease threats are monitored and acted upon. Both private veterinary surgeons and Government employed veterinary surgeons, are uniquely positioned to make every on-farm contact count by advising on overall herd health and welfare, wider determinants and, in turn, disease surveillance and prevention.

31) Thus, the involvement of the veterinary profession within any new Agricultural Education and Knowledge Exchange framework will be integral to converting knowledge into action and thus achieving animal health, animal welfare, environmental and productivity gains.

Environmental Sustainability

32) Animal health and welfare can mutually benefit environmental sustainability. The veterinary profession has long led the way in recognising and encouraging the concept of ‘One Health’, recognising the synergies between animal health, public health and environmental health. For example, the current 5-year Antimicrobial Resistance (AMR) strategy and the ‘One Health’ approach it utilises has been successful in reducing sales of antibiotics to treat and prevent disease in UK farm livestock to a record low. The new agricultural policy could be used to build on this and further the objectives of the new 5-year AMR strategy by incentivising measures which help to achieve these targets.

33) The use of innovative whole farm management systems that integrate the delivery of environmentally beneficial outcomes as well as high quality animal health and welfare food products are paramount to ensure environmentally sustainable agriculture. Veterinary input is essential to the design and implementation of these systems.

34) Antimicrobial use in livestock can lead to antimicrobials being excreted unchanged and thus reach the environment. This creates the potential for Antimicrobial Resistance (AMR) transmission from livestock into ecosystems.

35) Animal agriculture can be a significant contributor to climate change. To mitigate climate change, changes in animal production and farming practices are necessary to increase efficiency while maintaining animal welfare. Schemes designed to advance national animal health with a focus on disease prevention and eradication can help to maximise performance and reduce wastage including greenhouse gas emissions.

36) Several practices have already been identified to have a positive impact in improving production efficiency and reducing greenhouse gas emissions, such as improving grazing management, adding certain nutrients to the diets of animals, providing
appropriate water sources and protecting water quality and improving genetics and reproductive efficiency7.

37) It is important to recognise the role livestock can play in optimising soil quality and productivity with whole farm management models that minimise environmental degradation and use resources and energy more efficiently. Mob grazing or managed intensive rotational grazing (MIRG) for example is a form of rotational grazing whereby a high stock density is grazed in a paddock with short grazing periods and long rest periods8. This approach ensures that:

- Forage is harvested
- Optimal trampling and treading of the soil occurs to prevent compaction and allow water penetration
- Soil erosion is minimised through rest periods to prevent livestock from continuously treading and compacting the same area
- Manure is dispersed through hoof action, reducing fertilizer maintenance costs and mitigating against the environmental impact of some fertilizers

38) Veterinary input in the design of managed intensive rotational grazing systems is vital to ensure that provisions are in place across rotations to adequately meet ruminant and non-ruminant nutrient, water, shade and shelter requirements and maintain animal health.

**Veterinary Capacity**

39) The involvement of the veterinary profession within any new agricultural policy will be integral to achieving animal health, animal welfare, environmental and productivity gains. This ambitious agriculture policy will not achieve its aims if the veterinary profession does not have the capacity to play the role it is uniquely able to.

40) There have been concerns about the capacity of the veterinary workforce, which have existed for some time, but have been brought into sharp focus by the exit of the UK from the EU. The Major Employers Group (MEG) which represents large veterinary practices carried out a review in July 2017 which found a workforce shortage of around 11%. The demand for veterinary surgeons is likely to increase following exit from the EU. Nigel Gibbens, the then Chief Veterinary Officer UK, suggested that the volume of

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7 Royal College of Veterinary Surgeons, Veterinary research in the UK: a snapshot A Report by the RCVS Research Subcommittee 2013
products requiring veterinary export health certification could increase by as much as 325% in the case of no deal being reached between the EU and UK.\(^9\)

41) The UK veterinary workforce is highly reliant on EU graduates. Statistics from the RCVS reveal the dependence of the UK on non-UK EU vets. The RCVS currently registers around 1,000 overseas vets per year, of which EU nationals make up the clear majority. In 2016, the proportion of all new registrants in that year from non-UK EU vet schools was 47\%\(^{10}\)

42) It will be vital that an appropriate number of veterinary surgeons can be recruited from overseas, whether from EU or from outside the EU, to ensure that essential veterinary work continues, and the opportunities of a new agricultural policy can be seized. To alleviate labour constraints BVA has made the following calls upon Government:

- Overseas nationals graduating from UK vet schools should be allowed to live and work in the UK.
- Vets should immediately be restored to the Shortage Occupation List.
- The veterinary profession should be prioritised within future immigration policy. The Government should consider the economic and social impact the profession has, beyond its relatively small size.

\(^{9}\) Speaking at Official Veterinarian Conference 2017, reported https://www.vettimes.co.uk/news/non-uk-vetsessential-after-brexit-says-cvo/

\(^{10}\) Royal College of Veterinary Surgeons, RCVS Facts 2016, 2017