BVA AND SCOTTISH BRANCH RESPONSE TO SCOTTISH GOVERNMENT CHANGE OF POLICY FOR THE DISPOSAL OF ANIMAL BY-PRODUCTS IN PARTS OF SCOTLAND CURRENTLY DESIGNATED AS REMOTE AREAS AS DEFINED UNDER THE ANIMAL BY-PRODUCTS (ENFORCEMENT) (SCOTLAND) REGULATIONS 2013

1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom and has over 15,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

2) BVA’s Scottish Branch brings together representatives of the BVA’s territorial and specialist divisions, government, academic institutions and research organisations in Scotland. The Branch advises BVA on the consensus view of the Scottish members on Scottish and United Kingdom issues. We have also consulted with our specialist division the Fish Veterinary Society.

3) We understand that following discussions with the European Commission, it has been confirmed that the Scottish Government is not implementing the derogation for the disposal of animal by-products (ABPs) in remote areas correctly. To comply with European legislation, the Scottish Government is in the process of changing the policy that allows ABPs to be disposed of under the current derogation (“by burning or burial on site or by other means under official supervision which prevent the transmission of risks to public and animal health in the designated ABP remote areas”). The current designated ABP remote area covers a large part of the Highlands and most of the Islands in Scotland and the change in policy will limit what species of livestock can make use of the derogation. ABPs from species of animals that are not allowed to take advantage of the remote areas derogation will have to use an approved ABP disposal route (disposal via an incineration or processing (rendering) plant or by sending it to a compost or anaerobic digestion (biogas) plant).

4) We support proposed option 2 ‘Amend the ABP Regulations so remote areas derogation applies to terrestrial livestock only’. The bovine, ovine and caprine animal populations in the derogated remote areas fall well below the maximum percentages set out in the EU Implementing Regulation and this option would allow terrestrial livestock in the Highlands and Islands to continue to take advantage of the ABP remote areas derogation. In light of information regarding the different populations of fish species in the designated remote areas (in many cases 100% of the UK total tonnage produced in 2013) it is clear that it is highly unlikely that the Scottish Government would be able to persuade the European Commission that those species can take advantage of the ABP remote areas derogation.

5) We understand that the overall impact of such a change on the aquaculture industry will be low, and that alternative options for those sites which will be impacted due to limited access to alternative disposal facilities are already being explored. We strongly support the principle that infrastructure for compliant, rather than derogated, disposal options should be available for fish farms located in the currently designated remote and areas and urge the Scottish Government to ensure that infrastructure is put in place before the derogation for aquaculture is removed. Premature removal of the derogation could impact on animal welfare if the euthanasia of diseased stock is delayed because of the absence of legal means of disposal.

September 2015