BVA response to Defra: Health and Harmony the future for food, farming and the environment in a Green Brexit

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.

2. We welcome the opportunity to respond to ‘Health and Harmony: the future for food, farming and the environment in a Green Brexit.’

Introduction

3. 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 preventative 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.

4. Veterinary surgeons negotiate, draft and uphold necessary legislation and international standards. By carrying out surveillance and enforcement from farm-to-fork, Official Veterinarians (OVs) certify the trade in animals and animal products thus contributing to economic prosperity and the sustainability of food production. The future of the UK agri-food production is therefore of great interest and importance to the veterinary profession.

5. 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 focused on delivering outcomes.
Leaving the Common Agricultural Policy

6. The Common Agricultural Policy (CAP) is the EU policy to provide financial support to farmers in member states. CAP payments are an important part of farm incomes in the UK: In the UK, EU farm subsidies currently make up around 50-60% of farm income.¹

7. There are two major strands to CAP payments: one for direct income support (pillar 1) and the second for rural development (pillar 2). Direct income support is a much larger programme than rural development.

8. The UK Government has pledged to maintain the same cash funds as currently for CAP until the end of the Parliament, under the expectation that this will be 2022. There is uncertainty as to the total quantum of support that will be made available after 2022.² The UK Government will have different spending priorities than the collective EU and it is possible that the total budget for agricultural support will reduce post Brexit. It is therefore essential that a future agricultural policy maximises the impact of the associated budget.

9. At present, member states can transfer up to 15% of the Pillar 1 payments they receive from the EU to its Pillar 2 allocation. There will be greater freedom, after EU exit, to shift the balance between pillars one and two style support to stimulate benefits.

10. The breakdown of payments for the whole UK is set down below for EU budget year 2015, in € millions.³

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<table>
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<tbody>
<tr>
<td>Pillar 1 (Total)</td>
<td>3,150</td>
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<td>Of which:</td>
<td></td>
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<tr>
<td>Direct payments</td>
<td>3,112</td>
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<tr>
<td>Market support</td>
<td>38</td>
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<tr>
<td>Pillar 2 (Total)</td>
<td>959</td>
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<td>Of which:</td>
<td></td>
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<tr>
<td>EU</td>
<td>709</td>
</tr>
<tr>
<td>UK co-financing</td>
<td>250</td>
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<tr>
<td>Total UK CAP payments</td>
<td>4,109</td>
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¹ House of Commons Library, EU Referendum: Impact on UK Agriculture Policy, 2016
² House of Commons Library, EU Referendum: Impact on UK Agriculture Policy, 2016
³ Institute for Government, Common Agricultural Policy, 2017
https://www.instituteforgovernment.org.uk/explainers/common-agricultural-policy
Determining the consequences of withdrawing Direct Payments

11. As noted above, CAP payments are an important part of farm incomes in the UK. EU farm payments currently make up around 50-60% of farm incomes. Any change in policy must be cognisant of this dependence and properly examine any consequences.

12. Any decision will also be made within a context of considerable uncertainty about future trading relationships with the EU and other countries. 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 could reduce the efficiency of produce moving to European markets and place additional administrative costs upon farmers.

13. This uncertainty means it will be difficult to assess the full impact of the withdrawal of direct payments to farm incomes. More challenging will be determining the impact on the wider rural economy that deliver goods and services to farms. Farm animal veterinary practices in the UK represent an important service sector to livestock farmers, and act as means to detect disease and enforce animal health and welfare legislation. Ensuring the continued capability of farm animal practice as a means of achieving the public goods of animal health and welfare should be properly assessed by the Government.

The principle of public money for public goods

14. The Health and Harmony consultation paper sets out a recalibration of the system of agricultural support in England, with a phased withdrawal of direct payments to farmers. This will be replaced with a system of public money being used for public goods that benefit producers, consumers and wider society. BVA has supported this approach of public money for public goods.

15. BVA has called on the Government to utilise public money to incentivise and support animal health and welfare outcomes as public goods. Therefore, we welcome the Government recognition of animal health and welfare as public goods that will be supported within future agricultural policy post Brexit.

16. Public goods by their very nature, are not market goods in the same way as livestock products such as meat or milk. Public goods have no explicit value in terms of market prices and so the market cannot efficiently allocate resources to

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4 House of Commons Library, Briefing Paper Number 8065, 1 August 2017 Importance of trade with the EU for UK industries
them. Other means therefore must be used – such as the intervention of Government in the form of regulation or financial support.\textsuperscript{5}

17. The market may not allocate resources for animal health or animal welfare; however, the wider economic and societal impacts of animal health and welfare can be substantial. This was most clearly illustrated by the Foot and Mouth Disease 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.\textsuperscript{6} Animal disease outbreaks are a strategic risk on the National Risk Register.\textsuperscript{7}

18. 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.”\textsuperscript{8} Therefore, agricultural policy should support animal health and welfare which underpins the reputation of UK agricultural produce.

19. The UK should consider how best to utilise agricultural support to incentivise animal health and welfare within the rules of the WTO. The WTO Agreement on Agriculture provides a framework on agricultural support. If the UK wants to reduce the likelihood of any challenge in the WTO to a new agricultural support regime, it may seek to minimise both trade distortion and direct impact on production.\textsuperscript{9} Financial incentives focused on animal welfare outcomes are trade compatible under the World Trade Organisation rules.\textsuperscript{10}

The delivery of public money for public goods

20. Delivering animal health and welfare as public goods should be at the heart of a new post Brexit agricultural policy- benefiting producers, consumers and wider society. We welcome the intention contained within the Health and Harmony consultation document to develop policies to incentivise these public goods. Specifics proposals suggested in the consultation paper include:

\textsuperscript{5} Farm Animal Welfare Committee (FAWC), \textit{Economics and Farm Animal Welfare}, 2011
\textsuperscript{6} National Audit Office, \textit{The 2001 Outbreak of Foot and Mouth Disease}, 2002
\textsuperscript{7} Cabinet Office, \textit{National Risk Register of Civil Emergencies 2017}, 2017
\textsuperscript{8} 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
\textsuperscript{9} FAWC, \textit{An Animal Health and Welfare Stewardship Programme} 2014
\textsuperscript{10} Royal Society of the Protection of Animals, \textit{An introduction to the WTO rules that affect animal welfare}, 2016
Pilot schemes that offer targeted payments to farmers who deliver higher welfare outcomes in sectors where animal welfare largely remains at the legislative minimum.

Payments to farmers who trial a new approach or technology which could improve welfare outcomes but which is not an industry standard.

Providing greater clarity of information to consumers to support higher welfare production.

Collaboration between government and industry to develop an ambitious plan to tackle endemic disease and drive up animal health standards. A clear vision and programme of partnership action to tackle non-statutory endemic disease and health conditions in the form of an Animal Health ‘Pathway’.

Improved use of data as a risk management tool through improved traceability, surveillance and use of electronic identification.

21. We welcome these proposals, but note that they are at a formative stage. We welcome the opportunity to work closely with Defra to expand upon these proposals. We would note the below principles which will be fundamental for success.

Veterinary Involvement

22. Both private veterinary surgeons and Government employed veterinary surgeons, are uniquely positioned to make every on-farm contact count by providing a holistic approach to overall herd health and welfare, its wider determinants and, in turn, disease surveillance and prevention. Veterinary surgeons working within the production animal sector work closely with farmers and animal keepers to ensure biosecurity measures are formulated, implemented and health and disease threats are monitored and acted upon.

23. Thus, the involvement of the veterinary profession within any new agricultural policy will be integral to achieving its aims. Policy-makers should actively engage veterinary expertise in the development of any animal health and animal welfare schemes.

Outcomes based

24. We note the intention to replace cross compliance with “a new, better targeted and proportionate mechanism to enforce the regulatory baseline.” 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: Nitrate Vulnerable Zones (NVZs)
• SMR 2: Wild birds
• SMR 3: Habitats and species
• SMR 4: Food and feed law
• SMR 5: Restrictions on the use of substances having hormonal or thyrostatic action and beta-agonists in farm animals
• SMR 6: Pig identification and registration
• SMR 7: Cattle identification and registration
• SMR 8: Sheep and goat identification
• SMR 9: Prevention and control of transmissible spongiform encephalopathies (TSEs)
• SMR 10: Plant Protection Products (PPPs)
• SMR 11: Welfare of calves
• SMR 12: Welfare of pigs
• SMR 13: Animal welfare

25. Under a new agricultural policy, measurement 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. 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.

26. 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. 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.

27. 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.

Animal welfare stewardship programme

28. In the report Brexit and the Veterinary Profession, BVA proposed a new animal welfare stewardship programme.\(^12\) This call is in line with the Farm Animal Welfare Committee (FAWC)\(^13\) and the Veterinary Development Council\(^14\) recommendations that the UK governments should work with industry to actively protect animal health and welfare and that this should include consideration of a farm animal welfare stewardship programme. Such a scheme, focussed on health and welfare that is evidence based and with welfare outcome safeguards, would use financial support for animal welfare as a public good, as has been the case for environmental stewardship. In 2014, the FAWC set out a proposed approach to developing such a stewardship programme starting with limited trials in each of the main livestock sectors.\(^15\)

New technology or approaches

29. 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.\(^16\) 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.

30. Although technologies have the potential to assist in the assessment of health and welfare outcomes, automatic systems should not replace the regular physical assessment of welfare and behavioural needs and appropriate human interventions by skilled veterinary professionals and keepers.\(^17\)

Farm assurance

31. Post-Brexit agriculture policy could also 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

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\(^{13}\) FAWC (previously the Farm Animal Welfare Council), *Economics and Farm Animal Welfare*, 2011


\(^{15}\) FAWC, *An Animal Health and Welfare Stewardship Programme* 2014


and ethically informed choices about the food products they buy and the impact of
these products on animal health and welfare.

32. The consultation document states that Defra is “considering whether providing
greater clarity of information to consumers could support higher welfare
production.” We support this aim, and Government ensuring labelling and farm
assurance schemes are underpinned by evidence and welfare outcome
safeguards.

33. 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.

34. 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. Therefore, in December 2017, BVA published a
detailed policy position on farm assurance schemes, which forms Annex A of
this submission.

35. 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.

Disease surveillance

36. 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, productivity, and
identify and manage threats to public health, trade, food quality, the environment
and leisure and tourism. Official statistics put the value of UK livestock outputs at
£12.7 billion, and the value of UK aquaculture outputs at £0.59 billion. A robust
surveillance system is integral to the realisation of these high value outputs.

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18 British Veterinary Association, BVA Position on Farm assurance schemes, 2017
19 British Veterinary Association, Vets speaking up for animal welfare BVA animal welfare strategy, 2016
37. The withdrawal of the UK from the EU will have far-reaching implications on the UK’s biosecurity and disease surveillance policy. EU legislation, structures and institutions are embedded within the UK surveillance network.

38. BVA has produced a detailed policy position on veterinary scanning surveillance which outlines our vision for animal health and disease monitoring post Brexit.\textsuperscript{22} This forms Annex B 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.

The role of livestock in achieving environmental public goods

39. The consultation document considers environmental public goods and animal health and welfare public goods separately. However, the two can be mutually beneficial. 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 is paramount to ensure environmentally sustainable agriculture. Veterinary input is essential to the design and implementation of these systems.

40. 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.

41. Several practices have already been identified to have a positive impact in improving production efficiency and reducing greenhouse gas emissions, such as

\textsuperscript{22} British Veterinary Association, \textit{Position on veterinary scanning surveillance (animal health and disease monitoring)}, 2018
improving grazing management, adding certain nutrients to the diets of animals, providing appropriate water sources and protecting water quality and improving genetics and reproductive efficiency.  

42. In terms of soil health, in 2010 the annual external cost to farmers from soil erosion and compaction from agriculture in England and Wales was estimated to be £305 million.  

With this in mind, 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.

43. 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 periods. This approach ensures that:

- Forage is harvested
- Sufficient trampling and compaction of the soil occurs to 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

44. 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.

Coordinate with wider strategic goals

45. A new agricultural policy offers an opportunity to harmonise support to farms with other key national and international strategies. This will be particularly true for the UK’s Industrial Strategy which will have a key role in increasing productivity within the farming sector.

46. The design of a new agricultural policy could be used to further the objectives of a new 5-year Antimicrobial Resistance (AMR) strategy. This will be building upon the successes under the current 5-year strategy where sales of antibiotics to treat and prevent disease in UK farm livestock have achieved a record low. Targets for

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23 Royal College of Veterinary Surgeons, Veterinary research in the UK: a snapshot A Report by the RCVS Research Subcommittee 2013
further reducing, refining or replacing antibiotic use across the key livestock sectors have been developed by a ‘Targets Task Force’, facilitated by the Responsible Use of Medicines in Agriculture (RUMA) Alliance.

47. As competence for future trade policy is transferred from the EU, this should be used to reinforce agricultural support, not undermine it. When negotiating future trade deals, the Government should prioritise, animal health, animal welfare, public health and food safety and not undercut efforts to address antimicrobial resistance. There should also be consideration given to UK farmers, ensuring they are not undercut on price while realising higher standards.

Agricultural policy and devolution

48. Agricultural policy in the UK is devolved. Devolved administrations have been able to shape agricultural policy within their respective jurisdictions. At the same time, the EU has ensured a degree of coherence to agricultural policy amongst all four administrations. Brexit presents an opportunity to tailor agricultural policy to suit the respective regions of the UK, however coordination and oversight on matters of animal health and welfare is crucial. There will therefore need to be consideration where decisions on agricultural policy are taken, and how best to coordinate efforts across the nations of the UK.

49. To facilitate this, the UK governments should establish a body to oversee and coordinate animal health and welfare policy across the four administrations of the UK and facilitate partnership working between industry and government to tackle endemic disease and animal health and welfare challenges.