CONSULTATION QUESTION SECTION

ABOUT YOU SECTION

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GENERAL QUESTIONS

Please indicate whether you are responding as:
(Please tick)
   a. An individual
   b. On behalf of an organisation /

Please indicate which of these best represent you or your organisation
[Please tick all that apply]
   a. Farming
   b. Forestry
   c. Environmental interests
   d. Tourism/hospitality
   e. Food and timber supply chains
   f. Public sector
   g. Private sector
   h. Third sector
   i. Trade Union/Representative /
   j. Other, please specify below

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.

BVA Welsh Branch represents members in Wales, bringing together representatives of specialist and territorial divisions, government, academic institutions and research organisations in Wales. The branch advises BVA on the consensus view of members in Wales on Welsh and UK issues.
Question 1 of 20

From Chapter 4: Land Management Programme

We propose a new Land Management Programme consisting of an Economic Resilience scheme and a Public Goods scheme. Do you agree these schemes are the best way to deliver against the principles?

1. Yes
2. No
3. Unsure /

If NO, what alternatives would be best?

A new agricultural policy should be both ambitious and focussed on delivering outcomes. It is crucial that this new policy offers the best opportunities to develop a strong, competitive and innovative food industry which enjoys the confidence of customers at home and abroad, and is resilient to the potential changes in our relationships with trading partners following the UK’s departure from the EU.

BVA supports the principle of public money for public goods. We also recognise the specific need to ensure economic resilience in the Welsh agricultural sector. Farming is the cornerstone of the £6.9 billion Welsh food and drink supply chain industry and represents over 58,000 jobs¹, yet only 7% of Welsh land is defined as good or excellent quality², making it difficult to drive a profit from the land. We therefore support Welsh Government’s concept of supporting the economic resilience of Welsh agriculture, by supporting rural economies and rural communities, whilst also rewarding public goods. However, we would welcome greater clarity on how the money will be split between the two schemes and how they will work together to achieve the best possible outcomes whilst ensuring that the positive outcomes of previous support schemes continue to be maintained. Detailed impact assessments of any new support schemes are vital to identify potential unintended consequences, including to animal health, animal welfare, public health and environmental health.

Those public goods that will be rewarded by the new scheme, must be clearly defined, be based on sound scientific evidence, and should benefit the country as a whole, whilst not having a negative impact on the economies and communities that deliver them. The BVA recognises that animal health and animal welfare are all important public goods. These public goods reflect the Welsh government’s belief that animal sentience should be enshrined in law³, their commitment to the concept of One Health and keeping the people of Wales safe by protecting them from disease, and their recognition that high animal welfare and food safety standards are the foundations underpinning consumer confidence in Welsh produce, both at home and abroad. We therefore believe that these public goods must be recognised by any public goods scheme. A new agricultural policy offers an opportunity to harmonise support to farms with other key Welsh, UK and international strategies. We would ask that animal health and welfare policy, legislation and strategies are given full consideration alongside these other factors.

In particular, the design of a new agricultural policy would be an ideal opportunity to further the objectives of the new 5-year Antimicrobial Resistance (AMR) strategy.
Targets for 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. The new policy could incentivise measures which help to achieve these targets through responsible antimicrobial use, health planning, vaccination and improved biosecurity. Veterinary surgeons, who have exclusive responsibility for prescribing veterinary antibiotics, play a key leadership role that should be recognised in any AMR strategy.

Wales should consider how best to utilise agricultural support to incentivise animal health and welfare within the rules of the WTO, as well as any ongoing agreements that we may have with the EU. The WTO Agreement on Agriculture provides a framework on agricultural support. If Wales wishes 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. To achieve this farm payments should be through a government-funded scheme which does not provide price support to farmers linked to market value. The ambition must be to raise standards of animal health and welfare, and under no circumstances should our existing high standards be compromised by any future agreements with trading partners. Any new schemes must clearly recognise the uncertainty of future trading arrangements, and potential changes in Wales’ agricultural productivity, imports and exports following our departure from the EU, and should not put us at an economic disadvantage whilst navigating a new trading landscape.

As now, there will be a requirement to comply with the animal health and public health (including food safety) standards set by the World Organisation for Animal Health (OIE); World Health Organisation (WHO) and Food and Agriculture Organization of the United Nations (FAO). WTO rules for trade in animals and animal products function on this basis.

As agricultural policy in the UK is devolved, administrations have been able to shape agricultural policy to the needs of 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 countries 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.

To facilitate this, BVA would welcome the establishment of a UK wide 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.

1https://www.nfu-cymru.org.uk/campaigns/back-welsh-farming/
2https://beta.gov.wales/agricultural-land-classification-predictive-map
Question 2 of 20

From Chapter 4: Land Management Programme

Does the Welsh Government need to take action to ensure tenants can access new schemes?

1. Yes
2. No
3. Unsure /

If YES, what action would be best?

The BVA recognises that many of our members’ roles in Wales are interlinked with the agricultural sector. The provision of 24 hour rural veterinary services for production animals is dependent on the viability of practices caring for these animals, which in turn depends on a thriving livestock production sector. It must be recognised that any measures which reduce the number of livestock farmers in Wales may have resultant negative consequences for the provision of rural veterinary services.
**Question 3 of 20**

*From Chapter 5: Economic Resilience*

From your experience of current programmes, what do you feel would work well for the future?

BVA feels that any future schemes should be collaborative, industry-led and cohesive across the UK.

Improvements in animal health and animal welfare increase economic resilience by increasing the efficiency of production, reducing the cost of production, limiting market volatility caused by outbreaks of disease, and creating consumer confidence, both at home and abroad, in the food we produce.

Examples of schemes that have had a positive impact on economic resilience through improving animal health and welfare standards include disease reduction and eradication programmes. If a disease is reduced or eradicated within a group of animals then their productivity and feed conversion efficiency are increased, increasing the efficiency and profitability of production.

In addition to improving economic resilience, successful eradication schemes will concurrently provide positive outcomes for public health and environmental public goods. For example, because eradication programmes increase production efficiency and food conversion efficiency, they also reduce greenhouse gas emissions from ruminal activity, providing a positive environmental outcome. Decreasing the incidence of a disease also reduces the need to treat animals affected by it. Treatment is often through the use of antimicrobials medicines, so reducing the incidence of a disease therefore decreases antimicrobial usage on farms, which is one of the ways in which the onset of antimicrobial resistance (AMR) can be slowed down. By providing these public health and environmental benefits, eradication schemes contribute to enhancing the global image of “Brand Wales”, which in turn contributes to economic resilience.

To achieve disease eradication long term on a single farm or to achieve eradication at a national level is impossible without central coordination. The provision of funding structures that allow this central coordination, in addition to support for individual farmers, is vital to enable to creation of effective national, and UK-wide, programmes—disease does not respect borders.

In addition, successful disease eradication will contribute to public goods through addressing AMR issues and enhancing the global image of Wales or “Brand Wales”. The provision of funding structures that allow this central coordination (in addition to grant support to individual land managers) is vital to enable effective national programmes.

The veterinary profession is well placed to play a key role in delivering such programmes and has done so successfully in Wales already, for example:

- [Gwaredu BVD](https://www.gwaredu.com/) is a national programme which tests young stock to identify herds that have BVD present on farm and support these in order to remove the infected
animals. All cattle farms in Wales are eligible to be part of the project irrespective of size or farming system, and over 50% of all farms have already been tested, within the first year of the scheme operating. Enrolled farms are spread all across Wales. In addition, 200 farms to date are working on dealing with the disease and will reap the benefits of improved animal health and welfare as well as reduced usage of antimicrobials, and many more will do so going forwards. The Gwaredu BVD scheme is a great example of utilising the relationship between farmers and their own vets to deliver positive outcomes efficiently. It is a good example of how the use of Rural Development Programme funding has yielded cost effective results.

• **Cymorth TB** links farmers, OVs and government vets and has been a good example of collaborative working since 2015. Official Veterinarians (OVs) are upskilled through a training package which leads to a OCQ(V)-Cymorth TB qualification, facilitating the provision of a comprehensive approach to the management of TB breakdowns, including a high level of support to farmers under restriction, minimising the impact of the breakdown. OVs have indicated that being part of Cymorth TB has enhanced their knowledge and the value they can offer as key players in the eradication of TB.

• The **Farming Connect** scheme is another great example of how vets can help deliver positive benefits on farms. Their training courses have utilised vets to deliver knowledge and skills transfer, for example in lambing techniques, improved livestock handling and the correct use of veterinary medicines. Their small capital grants scheme has proved successful, for example providing;
  - veterinary diagnostic testing such as faecal egg counts, helping to slow down the development of anthelmintic resistance.
  - improved handling facilities, which can improve the accuracy and safety of TB testing
  - Electronic Identification readers and software for sheep farmers, improving traceability and surveillance capacity.

It is important that schemes recognise the relationship between different farms and livestock populations within an area, and that “diseases do not respect boundaries”.

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**Question 4 of 20**

**From Chapter 5: Economic Resilience**

Do you agree with the focus of the Economic Resilience scheme being on growing the market opportunities for products from the land throughout the supply chain, rather than restricting support to land management businesses only?

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. If any schemes are to be widened across the supply chain, then this approach needs to be cohesive across the UK, to avoid Wales being put at any
economic disadvantage in comparison to other devolved nations. The BVA supports informed consumer education, informed choice and clear food labelling, in relation to animal welfare standards.
Question 5 of 20

From Chapter 5: Economic Resilience

Are the five proposed areas of support the right ones to improve economic resilience?

1. Yes
2. No
3. Unsure

Are there any areas which should be included but currently are not?

BVA recognises that animal health and animal welfare are inherent in all five areas of support. Areas five (knowledge exchange), four (effective risk management), two (improving productivity) and one (increasing market potential) listed in the consultation document are the most important areas for supporting and improving animal health and welfare standards.

Area three (diversification) can sometimes have negative consequences for animal health and animal welfare, and where diversification schemes may compete with current animal health and welfare outcomes (for example, improved access for dog walkers also creates an increased biosecurity risk and could increase the transmission of diseases such as bovine TB, sheep scab, hydatid disease and neosporosis.

Question 6 of 20

From Chapter 5: Economic Resilience

Of the five proposed areas for support, which are the priorities, both in terms of funding, and the sequence of delivery? For example, are certain measures needed in advance of others?

Public money should be used ambitiously. Areas five (knowledge exchange), four (effective risk management), two (improving productivity) and one (increasing market potential) listed in the consultation document are the most important areas for supporting and improving animal health and welfare standards.

Area three (diversification) can sometimes have negative consequences for animal health and animal welfare, and where diversification schemes may compete with current animal health and welfare outcomes (for example, improved access for dog walkers could also have an impact on biosecurity and livestock disease transmission) all these consequences should always be considered carefully.

Priority should be given to incentivising knowledge exchange, innovation, technology and new processes which can support animal health and welfare whilst optimising risk management, productivity and competitiveness.

We particularly welcome the recognition that productivity, profitability and resilience of businesses in Wales is linked to the health and welfare of livestock, and that the
Welsh Government support will be linked to these outcomes and designed to support improvements in standards.

We welcome the recognition that 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 postponed¹.

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 billion², and the value of UK aquaculture outputs at £0.59 billion³. A robust surveillance system is integral to the realisation of these high value outputs.

BVA has produced a detailed policy position on veterinary scanning surveillance which outlines our vision for animal health and disease monitoring post Brexit⁴. 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.

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 Farming⁵. 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.

Investment in measures which make achieving desirable outcomes and compliance with basic standards easier would be beneficial. For example, investment in a well-conceived, collaborative, industry-led programme of disease eradication which farmers can easily follow has the potential to positively impact many areas of concern, including animal health and welfare, AMR, productivity and carbon usage.
The veterinary profession is best placed to deliver such schemes, with excellent communication systems already in place between government vets, veterinary delivery partners, vets on farms and farmers themselves. There are existing programmes which have demonstrated this to be a well-received and effective approach in Wales, for example:

- **Gwaredu BVD** is a national programme which tests young stock to identify herds that have BVD present on farm and support these in order to remove the infected animals. All cattle farms in Wales are eligible to be part of the project irrespective of size or farming system, and over 50% of all farms have already been tested, within the first year of the scheme operating. Enrolled farms are spread all across Wales. In addition, 200 farms to date are working on dealing with the disease and will reap the benefits of improved animal health and welfare as well as reduced usage of antimicrobials, and many more will do so going forwards. The Gwaredu BVD scheme is a great example of utilising the relationship between farmers and their own vets to deliver positive outcomes efficiently. It is a good example of how the use of Rural Development Programme funding has yielded cost effective results.

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- The **Farming Connect** scheme is another great example of how vets can help deliver positive benefits on farms. Their training courses have utilised vets to deliver knowledge and skills transfer, for example in lambing techniques, improved livestock handling and the correct use of veterinary medicines. Their small capital grants scheme has proved successful, for example providing:
  - veterinary diagnostic testing such as faecal egg counts, helping to slow down the development of anthelmintic resistance.
  - improved handling facilities, which can improve the accuracy and safety of TB testing
  - Electronic Identification readers and software for sheep farmers, improving traceability and surveillance capacity.

1. National Audit Office (2002), The 2001 Outbreak of Foot and Mouth Disease
4. British Veterinary Association (2018), Position on veterinary scanning surveillance (animal health and disease monitoring)
5. Precision Livestock Farming is the creation of ‘a management system based on continuous automatic real-time monitoring and control of production/reproduction, animal health and welfare, and the environmental impact of livestock production’. Berkmans, D., 2014 Precision livestock farming
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From Chapter 5: Economic Resilience

Should we be investing in people, for example to bring in new ideas, skills and people into land management and the supply chain in Wales?

1. Yes /
2. No
3. Unsure

If YES, how should we look to do this?

Investment in people via knowledge transfer initiatives would be beneficial.

The resilience of the veterinary and farming sectors are intertwined, with the veterinary profession being an integral part of the agricultural and food sectors. Veterinary surgeons working within the production animal sector work closely with farmers and animal keepers to protect animals, people and the environment they share. They promote and safeguard animal health and welfare, provide preventative healthcare and treatment for livestock, influence sustainable future livestock and food production, undertake research and development and ensure biosecurity measures are formulated, implemented and health and disease threats are monitored and acted upon. No export trade in live animals and animal products can take place without veterinary certification and veterinary specialists are crucial in protecting public health (including food safety). 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. 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. Policy-makers should consider how best to engage veterinary expertise within a new agricultural policy.

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, 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.

Improvements in areas such as animal health and welfare standards, responsible use of medicines, biosecurity and production efficiency need to be achieved through increased knowledge and skills transfer to farmers and those who care for livestock. Veterinary surgeons who are on farm and have a deep understanding of local factors are well placed to deliver these objectives.

The Farming Connect scheme is great example of how vets can help deliver positive benefits on farms. Their training courses have utilised vets to deliver knowledge and
skills transfer, for example in lambing techniques, improved livestock handling and the correct use of veterinary medicines. Their small capital grants scheme has proved successful, for example providing;
- veterinary diagnostic testing such as faecal egg counts, helping to slow down the development of anthelmintic resistance.
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**Question 8 of 20**

*From Chapter 6: Public Goods*

We have set out our proposed parameters for the public goods scheme. Are they appropriate?

1. Yes
2. No
3. Unsure

Would you change anything?

1. Yes
2. No
3. Unsure

If YES, what?

Parameter 1 (Scope of the scheme – which public goods).

BVA believes that animal health and animal welfare are important public goods. They meet the accepted definition of a public good, and accepted means are available of measuring their outcomes, which include positive environmental outcomes. There is much evidence and support for animal health and welfare being recognised as public goods, and they should therefore be recognised and rewarded in any future public goods scheme.

Parameter 2 (Open to all)

The parameters of the scheme include some significant changes to who will be eligible for payments. The broadening of access may result in reduced funding for the farmers who currently rely on direct payments under the existing CAP.
framework, since a greater number of landowners will be eligible to receive the funding. Wales may be disproportionately affected by cessation of direct payments due to having a larger percentage of farmers occupying land designated as LFA than England.

Parameter 4 (Evidence based public goods)
There is a large body of evidence supporting the environmental benefits of various aspects of livestock farming in Wales6-10. These include carbon sequestration in grazing pastures, particularly leguminous pastures, reduction of methane emissions through disease eradication, increased productivity, reduced losses and increased feeding efficiency, and reduced food miles from consuming locally produced food.

Parameter 5 (Additionality)
The principle of additionality could also result in a lack of recognition for existing standards and schemes that farms have been working towards for many years. It will be important to ensure that the potential impact of the proposed changes are carefully considered, and that existing positive outcomes of current schemes are maintained and not reduced due to their lack of “additionality”.

Parameter 6 (Advisory support for land owners)
Having recognised that animal health and animal welfare are public goods, BVA would like to see vets engaged in provision of appropriate guidance to farmers on how to deliver positive measurable outcomes of these public goods

**Question 9 of 20**  
*From Chapter 6: Public Goods*

This scheme is meant to offer land managers the opportunity to access a significant new income stream as the BPS comes to an end. How could we improve what is being proposed to attract land managers whilst still achieving our vision and objectives?

The scheme could be improved by widening the short list of identified public goods that will be rewarded by the proposed scheme, which are currently all environmental public goods, to incorporate other important public goods. The decision of which public goods are to be rewarded should be evidence-based and should not be detrimental to the rural economies and communities that are being asked to deliver them. They should also be measurable through objective, accurate and direct assessments.

BVA believes that animal health and animal welfare must be recognised as important public goods and rewarded through any proposed public goods scheme. There is a large body of evidence showing that animal health and welfare improvements will concurrently deliver positive outcomes for environmental public goods, especially through reduction in inefficiencies due to disease presence\(^1\)\(^-\)\(^5\). If disease is no longer present then productivity and feed conversion efficiency will increase, while greenhouse gas production and wastage will be reduced\(^6\). Disease requires treatment, and this is commonly through antimicrobials to deal with the pathogen or secondary infections as a result of the primary pathogen. Disease eradication will reduce the need for treatment on farm – further reducing costs – and meeting a need to deal with AMR through the reduction in use on farms.

Any proposed scheme that potentially affects livestock and food production methods must have a detailed impact assessment performed of the many potential consequences that may be induced. Failure to recognise and protect animal health and animal welfare as public goods could have serious implications, including on public health. For example, disease surveillance and biosecurity, the transmission of zoonotic and food-borne diseases, the continued availability of vital medicines, food safety and consumer confidence.

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


https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4873495/  


5 Pol-van Dasselaar, A. 2017. EIP-AGRI Focus Group Grazing for carbon, Starting Paper.  
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From Chapter 6: Public Goods

Are there any other Public Goods which you think should be supported?

1. Yes / 2. No / 3. Unsure

If YES, why?

BVA supports the principle of public money for public goods. BVA believes that animal health and animal welfare must be recognised as important public goods and rewarded through any proposed public goods scheme. We recognise that the proposed list of public goods is not exclusive, however, it is extremely concerning to see animal health and animal welfare overlooked by the proposed public goods scheme, 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.

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 them. Other means therefore must be used – such as the intervention of Government in the form of regulation or financial support. 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, and animal disease outbreaks are a strategic risk on the National Risk Register. There is much evidence and support for animal health and welfare being recognised as public goods\(^1-5\). The UK Government has recognised this with and is in the process of legislating animal health and welfare within a system of public money for public goods. We ask for specific recognition of animal health and welfare as a public good attracting public money.

Delivering animal health and welfare as public goods should be at the heart of a new post Brexit agricultural policy. It underpins the reputation of UK and Welsh agricultural produce and benefits producers, consumers and wider society, creating consumer confidence in “brand Wales”. The importance of that reputation is acknowledged by both the Welsh and UK Governments. Welsh Government Cabinet Secretary for Energy, Planning and Rural Affairs, Lesley Griffiths, has stated that “Safeguarding the health and welfare of farmed animals kept in Wales throughout their lives, up to and including the point of slaughter, is a high priority.”\(^6\) 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.”\(^7\) We would welcome more specific mention of policies to utilise agricultural support to incentivise animal health and welfare.


\(^{7}\)
Any proposed scheme that potentially affects livestock and food production methods must have a detailed impact assessment performed of the many potential consequences that may be induced. Failure to recognise and protect animal health and animal welfare as public goods could have serious implications, including on public health. For example, disease surveillance and biosecurity, the transmission of zoonotic and food-borne diseases, the continued availability of vital medicines, food safety and consumer confidence.

The decision of which public goods are to be rewarded should be evidence-based and should not be detrimental to the rural economies and communities that are being asked to deliver them. There is a large body of evidence showing that animal health and welfare improvements will concurrently deliver positive outcomes for environmental public goods\textsuperscript{8-12}, through reduction in inefficiencies due to disease presence. If disease is no longer present then productivity and feed conversion efficiency will increase, while greenhouse gas production and wastage will be reduced\textsuperscript{2}. Disease requires treatment, and this is commonly through antimicrobials to deal with the pathogen or secondary infections as a result of the primary pathogen. Disease eradication will reduce the need for treatment on farm – further reducing costs – and meeting a need to deal with AMR through the reduction in use on farms.

We support the intention to create a new set of basic standards to define responsible land management and to act as a gateway for access to the schemes, which “could be derived from appropriate elements of existing codes and regulations including cross-compliance where they exist”. These should be drawn up with input from veterinary professionals.

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: Welfare of farmed animals
We support the use of the public goods scheme to improve the ecology of Welsh landscapes. Schemes which aim to increase biodiversity, protect watersheds and develop ecotourism opportunities that contribute sustainable economic benefits for rural communities should be incentivised and supported. If wildlife reintroduction programmes are considered, these should be multidisciplinary in nature with a strong veterinary input to ensure that the health and welfare of introduced and existing wildlife populations, and of neighbouring livestock populations that may be impacted upon, are all well managed.

6 Lesley Griffiths, Cabinet Secretary for Energy, Planning and Rural affairs, was quoted saying this as part of the launch of £1.1 million Food Business Investment scheme package of grant aid for small and medium sized slaughterhouses in Wales. https://gov.wales/newsroom/environmentandcountryside/2018/180322-1.1m-grant-aid-scheme-for-small-and-medium-size-slaughterhouses/?lang=en
7 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
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*From Chapter 6: Public Goods*

A number of public goods could potentially take several years, sometimes decades, to be fully realised. E.g. carbon sequestration through broad leaf trees. To deliver on these, land managers may need to enter into a long term contract. How do you see such agreements working? What do you see as the benefits or disadvantages to such agreements?

BVA believes that animal health and animal welfare must be recognised as important public goods and rewarded through any proposed public goods scheme.

Agreements within any public goods scheme should be predominantly based on outcome safeguards and done in a meaningful way. Prioritisation and measurement of outcomes must be based on sound, scientific evidence. 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.

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. Evidence based 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. For example, 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.

There is a large body of evidence showing that improving animal health and animal welfare concurrently benefits environmental public goods for example by reduction of greenhouse house emissions through increased efficiency of production. The graph below illustrates the use of evidence based outcomes by measuring the relative reduction of greenhouse gas emissions that can be achieved by controlling each endemic disease of cattle.
The graph shows us, for example, that BVD eradication (which we are well on the way towards achieving in Wales through the Gwaredu BVD programme) will yield a 14% reduction in greenhouse gas emissions in dairy cattle. This is an example of a measurable outcome of a long-term project delivering concurrent environmental and animal health and welfare public goods. This process could be repeated for all endemic diseases of all livestock species.

It may be that some environmental public goods, e.g. carbon sequestration, can be achieved more quickly by some methods than others. For example, livestock grazing pasture has enormous potential as a valuable carbon sink and that can be realised much faster than the planting of broad-leaved trees. Which of these methods are used should be based on scientific evidence with full impact assessment performed including consequences to animal health and welfare.

In the report Brexit and the Veterinary Profession, BVA proposed a new animal welfare stewardship programme. This call is in line with the Farm Animal Welfare Committee (FAWC) and the Veterinary Development Council 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.

Farm assurance schemes
Post-Brexit agriculture policy offers an ideal opportunity to 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. Raising standards of animal welfare and food safety, creates consumer confidence in “brand Wales”.

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 standards.

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 B of this submission. 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.

9FAWC (previously the Farm Animal Welfare Council), Economics and Farm Animal Welfare, 2011

Question 12 of 20
From Chapter 6: Public Goods
A collaborative approach to delivering public goods may in some instances provide better value for money than isolated activity. How could the scheme facilitate this approach? How could public and private bodies contribute to such partnerships?

BVA believes that animal health and animal welfare must be recognised as important public goods and rewarded through any proposed public goods scheme.

Delivery Partners

It must not be forgotten that the largest group of “private bodies” contributing to these partnerships are the farmers themselves, so collaboration with farmers is essential.

Private veterinary practices are another example of how “private bodies” can help deliver a collaborative approach to public goods. Policy-makers should consider how best to engage veterinary expertise within a new agricultural policy - the veterinary delivery partners, lechyd Da and Menter a busnes, are an excellent example of government vets and policy makers collaborating with private businesses.

Collaborative working

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

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. 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.

Veterinary surgeons working within the production animal sector work closely with farmers and animal keepers to safeguard animal health and welfare, influence sustainable future livestock and food production, and ensure biosecurity measures are formulated, implemented and health and disease threats are monitored and acted upon. No export trade in live animals and animal products can take place without veterinary certification and veterinary specialists are crucial in protecting public health (including food safety).

The veterinary profession is best placed to facilitate the delivery of animal health and animal welfare based public goods schemes, with excellent communication systems already in place between government vets, veterinary delivery partners, vets on farms and farmers themselves. There are existing programs which have demonstrated this to be a well-received and effective approach in Wales, for example:
• **Gwaredu BVD** is a national programme which tests young stock to identify herds that have BVD present on farm and support these in order to remove the infected animals. All cattle farms in Wales are eligible to be part of the project irrespective of size or farming system, and over 50% of all farms have already been tested, within the first year of the scheme operating. Enrolled farms are spread all across Wales. In addition, 200 farms to date are working on dealing with the disease and will reap the benefits of improved animal health and welfare as well as reduced usage of antimicrobials, and many more will do so going forwards. The Gwaredu BVD scheme is a great example of utilising the relationship between farmers and their own vets to deliver positive outcomes efficiently. It is a good example of how the use of Rural Development Programme funding has yielded cost effective results.

• **Cymorth TB** links farmers, OVs and government vets and has been a good example of collaborative working since 2015. Official Veterinarians (OVs) are upskilled through a training package which leads to a OCQ(V)-Cymorth TB qualification, facilitating the provision of a comprehensive approach to the management of TB breakdowns, including a high level of support to farmers under restriction, minimising the impact of the breakdown. OVs have indicated that being part of Cymorth TB has enhanced their knowledge and the value they can offer as key players in the eradication of TB.

• The **Farming Connect** scheme is another great example of how vets can help deliver positive benefits on farms. Their training courses have utilised vets to deliver knowledge and skills transfer, for example in lambing techniques, improved livestock handling and the correct use of veterinary medicines. Their small capital grants scheme has proved successful, for example providing:
  - veterinary diagnostic testing such as faecal egg counts, helping to slow down the development of anthelmintic resistance.
  - improved handling facilities, which can improve the accuracy and safety of TB testing
  - Electronic Identification readers and software for sheep farmers, improving traceability and surveillance capacity.

**Farm assurance schemes**

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 B of this submission. 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.
**Question 13 of 20**  
*From Chapter 6: Public Goods*

Some actions can deliver multiple public goods in the same location. For example, peat bog restoration can have benefits for carbon sequestration and flood risk reduction. However, some locations could be suitable for multiple public goods from different activities. For example, one location may be suitable to either plant trees for carbon sequestration, or to revert to wetland for biodiversity. How could locations for single, multiple or competing benefits be prioritised?

BVA believes that animal health and animal welfare must be recognised as important public goods and rewarded through any proposed public goods scheme.

Where multiple public goods can be generated from the land, measures which seek to improve animal health and welfare should be prioritised. Animal health and welfare public goods can mutually benefit environmental public goods.

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.

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.

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 emissions¹.

Several practices have already been identified to have a positive impact in improving production efficiency and reducing greenhouse gas emissions, such as adapting grazing management, adding certain nutrients to the diets of animals, providing appropriate water sources and protecting water quality and improving genetics and reproductive efficiency².

Livestock pastures can be used to deliver environmental public goods, through the use of certain grazing crops, such as legumes, to increase further the larger amount
of carbon sequestration that occurs in pastures\textsuperscript{3}. This area has significant potential for positive environmental outcomes.

Sometimes, animal health and welfare public goods and environmental public goods may be competing. In these instances, veterinary input is valuable to assess the potential animal welfare consequences of the competing public good. For example, re-introduction of peat bogs and wetlands may have environmental benefits, but also creates an ideal habitat for the liver fluke life cycle to take place in cattle and sheep. We have known multiple resistance to flukicidal drugs in the UK, so increasing the prevalence of liver fluke could have serious animal health and public health consequences. These could be avoided by ceasing to graze wetland areas, but then farmers would need to be compensated for the reduced livestock production capacity.

Another example is re-introduction of grazing cattle into upland areas. This could have environmental benefits but presents an increased biosecurity risk for the transmission of bovine TB when farmers have for a long time been trying to create TB free areas for cattle to graze, away from contiguous cattle and potential wildlife reservoirs.

Environmental public goods outcomes must be evidence based and measurable, not just perceived. More “natural”, extensive farming practices do not necessarily equate to an environmental benefit. For example, outdoor pigs consume more food for the same level of production as indoor systems, and indoor systems are able to generate electricity from the waste. Therefore, outdoor systems have a greater environmental cost per kg of meat produced.

In summary, the unintended consequences, including detrimental effects to animal health and welfare, of any public goods schemes must be evaluated by detailed impact assessments prior to introduction of schemes.

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\textsuperscript{4}. 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.

For example, mob grazing or managed intensive rotational grazing (MIRG) is a form of rotational grazing whereby a high stock density is grazed in a paddock with short grazing periods and long rest periods\textsuperscript{5}. This approach ensures that:

• Forage is harvested
• 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

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 and welfare.

2 Royal College of Veterinary Surgeons, Veterinary research in the UK: a snapshot A Report by the RCVS Research Subcommittee 2013

Question 14 of 20
From Chapter 6: Public Goods

Given that support for the delivery of public goods will be a new approach in Wales, there will be a requirement for a significant amount of training and advice for the sector. How best could this training and advice be delivered? Which areas of the sector need the most attention?

BVA believes that animal health and animal welfare must be recognised as important public goods and rewarded through any proposed public goods scheme.

Investment in training of veterinary professionals to ensure they are actively engaged in any new schemes would be beneficial.

Veterinary surgeons working within the production animal sector work closely with farmers and animal keepers to safeguard animal health and welfare, influence sustainable future livestock and food production, and ensure biosecurity measures are formulated, implemented and health and disease threats are monitored and acted upon. No export trade in live animals and animal products can take place without veterinary certification and veterinary specialists are crucial in protecting public health (including food safety). 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. 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. Policy-makers should consider how best to engage veterinary expertise within a new agricultural policy.

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.

Investment in the training of farmers is also essential, as the primary caretakers of livestock populations. Improvements in areas such as animal health and welfare standards, responsible use of medicines, biosecurity need to be achieved through the training of farmers and those who care for livestock, leading to increased efficiency and productivity. The veterinary profession is best placed to deliver high quality, efficient knowledge and skills transfer to farmers. Veterinary surgeons who attend farms have an in-depth knowledge of individual farms and local factors. They should be utilised, through the veterinary delivery partners lechyd Da and Menter a Busnes, to provide training and create the link between farmers, government vets and policy makers. Wales has some great examples of this, including the Gwaredu BVD, Cymorth TB, and Farming Connect schemes.

The **Farming Connect** small capital grants scheme has proved successful in helping to deliver public goods outcomes, for example providing veterinary diagnostic testing such as faecal egg counts, helping to slow down the development of anthelmintic resistance, and blood testing to improve production efficiency.

The **Gwaredu BVD** and **Cymorth TB** schemes are successfully reducing the prevalence of two important endemic diseases in Wales, with the aim of eradication. Eradication of these diseases will have positive public goods outcomes in terms of increasing production efficiency and reducing greenhouse gas emissions, and protecting public health and animal welfare\(^1\).

Livestock pastures can also be used to deliver environmental public goods, through the use of certain grazing crops, such as legumes, to increase further the larger amount of carbon sequestration that occurs in pastures\(^2\). Investment in training of agronomists and farmers is required to explore this area which has significant potential for positive environmental outcomes.


Question 15 of 20
From Chapter 6: Public Goods
Private investment in the purchase of public goods is already happening, but at a relatively small scale. How could the new scheme promote greater involvement from the private sector? What are the barriers to this type of investment?

Where private investment into schemes is considered, there needs to be veterinary input regarding the safeguarding of animal health, animal welfare and public health, which should be prioritised.

Question 16 of 20
From Chapter 8: Transition, delivery and legislation
What are your comments on the phased transition period and our ambition to complete the changes by 2025?

BVA is supportive of the Welsh Government’s plan to provide a phased transition period which aims to provide land managers with stability and confidence to invest in their businesses and thereby deliver public benefit.

CAP is the EU policy to provide financial support to farmers in member states. CAP payments are an important part of farm incomes in Wales. Welsh agriculture, and livestock farms in particular, are far more dependent upon payments from the Common Agricultural Policy (CAP) than their English counterparts—in some cases this can account for 80% of farm income in Wales, as compared with an average of 55% for the whole of the UK. Wales currently receives 9% of the total UK CAP budget\(^1\). Wales has four times the number of people employed directly within agriculture, when compared with England, whose employment may be affected by the proposed changes. 88% of Wales’ land area is agricultural land, mainly LFA land, and Wales’ main agricultural output is livestock (51%) and livestock products (35%)\(^2\). Welsh agriculture is heavily reliant on producing lamb, and the consultation document highlights that a third of this is exported to the EU. This change of financial support structure therefore comes at a time when the future of Wales’ main livestock industry is uncertain, given our unknown future trading arrangements with the EU, and unknown future export markets. Wales may also end up on an unlevel playing field in terms of financial support, with Scotland, who are also producing lambs for the same market, depending on what policies are adopted in Scotland. The term “Land Manager” is used throughout the document, in favour of the term “Farmer”, with the aim of broadening access the schemes, in particular to forestry and other land owners. Given that only 60 percent of land packages in Wales that could be eligible for the schemes currently receive direct payments, then whatever funding is available following EU exit is likely to be distributed across a higher number of land owners, reducing the amount available per land manager.

Any change in policy must be cognisant of these factors and properly examine any consequences, including performing detailed impact assessments. 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. We also do not currently have the additional veterinary workforce capability necessary to meet increased demand for trade certification of animal products following potential changes to current trading arrangements.

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. None of Wales’ agricultural output could be realised without the veterinary services of our members throughout production, processing and export, and we recognise that members’ ability to provide livestock veterinary services may also be indirectly impacted upon by changes to CAP payments. 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. We would welcome detailed impact assessments on the effects the proposed changes could have on animal health and welfare, public health and food safety, as well as economic and community effects.

1 UK Government Agricultural policy post-Brexit: https://publications.parliament.uk/pa/cm201719/cmselect/cmwelaf/402/40207.htm


**Question 17 of 20**

*From Chapter 8: Transition, delivery and legislation*

What is the most appropriate way to phase out the Basic Payment Scheme to start implementation of the new schemes?

Any transition period must ensure that there is no resultant decrease in animal health, animal welfare or public health standards due to changes in financial support structure. For example, animal products imported from non-EU countries should have been produced under equivalent welfare standards to our own.

**Question 18 of 20**

*From Chapter 8: Transition, delivery and legislation*

How can we simplify the current administration and delivery of the Basic Payment Scheme during the phased transition period?
Any transition period must ensure that there is no resultant decrease in animal health, animal welfare or public health standards due to changes in financial support structure. For example, animal products imported from non-EU countries should have been produced under equivalent welfare standards to our own.
**Question 19 of 20**

**Welsh Language standards**
Will the proposed land management programme have any effects (either positive or adverse) on:
- opportunities for persons to use the Welsh language;
- treating the Welsh language no less favourably than the English language?

BVA is aware of the Welsh language act and the importance of the Welsh language in Welsh communities, particularly in rural areas likely to be most affected by agricultural policy. Our high animal health and animal welfare standards rely on effective communication between farmers, their own vets and government vets, for example to enable effective disease surveillance to be carried out. Welsh language is an essential aspect of this communication and it is important for animal health and welfare that farmers in all parts of Wales are able to access schemes and veterinary services in their chosen first language.

**Question 20 of 20**

**Do you wish to make any further comments?**

We welcome the opportunity to respond to ‘Brexit and our land: Securing the future of Welsh farming.’ We broadly support the principle of an economic resilience scheme and a public goods scheme. However, there needs to be more clarity within the proposed schemes:

- The proposals do not state how funding will be divided between the two schemes; it is important that funding from UK government is ring fenced for Welsh agriculture and is used for the benefit of Welsh farming, the cornerstone of the £6.9 billion Welsh food and drink supply chain, which represents over 58,000 jobs. The ambition must be to enhance our already high standards of animal health and animal welfare, in order to increase productivity and efficiency and economic resilience. There is strong evidence that this will also provide environmental benefits. The veterinary profession should be at the heart of helping farmers to realise this ambition.
- The list of public goods that will be rewarded under the public goods scheme is limited and makes no mention of any public goods relating to livestock production. BVA believes that animal health and animal welfare must be recognised as important public goods and rewarded through any proposed public goods scheme.
- Any proposed scheme that potentially affects livestock and food production methods must have a detailed impact assessment performed of the many potential consequences that may be induced. Failure to recognise and protect animal health and animal welfare as public goods could have serious implications, including on public health. For example, disease surveillance and biosecurity, the transmission of zoonotic and food-borne diseases, the continued availability of vital medicines, food safety and consumer confidence.
- Any new schemes must clearly recognise the uncertainty of future trading arrangements, and potential changes in Wales’ agricultural productivity, imports and
exports following our departure from the EU, and should not put us at an economic disadvantage whilst navigating a new trading landscape.

We would welcome the opportunity to work closely with the Welsh Government to expand upon these proposals.

1 https://www.nfu-cymru.org.uk/campaigns/back-welsh-farming/