BVA WELSH BRANCH RESPONSE TO WELSH GOVERNMENT CONSULTATION ON HOLDING IDENTIFIERS AND ASSOCIATED LIVESTOCK MOVEMENTS

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

2) The BVA’s Welsh Branch brings together representatives of the BVA’s territorial and specialist divisions, government, academic institutions and research organisations in Wales. The Branch advises BVA on the consensus view of the Welsh members on Welsh and United Kingdom issues.

3) We understand that in November 2013 the decision was taken to rationalise the County Parish Holding (CPH) system which involves the removal of Sole Occupancy Authorities (SOAs) and Cattle Tracing System (CTS) links along with the introduction of a distance rule. We are supportive of the current proposals for implementing those changes, which appear to achieve the objective of providing keepers, the agricultural industry in Wales and the Welsh Government with a simpler, more effective and efficient system which at the same time increases Wales’ resilience and ability to deal with a disease outbreak.

4) In particular, we support the proposal to make a distinction between land/buildings up to and including a 10 mile radius of the primary production location (PPL) following advice taken from veterinary advisors from the Office of the Chief Veterinary Officer and members of the Livestock Identification Advisory Group (LIDAG). We agree that the ten mile proposal adequately balances the need to allow farmers to carry out their business and the need to have effective control measures. However, some clarity is needed on the approach which would be taken to a parcel of land located wholly outside the proposed 10 mile radius but directly contiguous with a parcel of land which straddles the boundary, and where the transfer of stock could require no more than an opened gate. Clear guidance on the management of such scenarios should be made available.

5) As a point of clarity, we understand that the TB testing exemption for movement of cattle to and from common land was removed with effect from 1 January 2016 for both contiguous and non-contiguous PPL, and therefore the detail at 5.6 of the consultation document is not strictly accurate. Notwithstanding this, we support the proposal that when a PPL is contiguous with the common land, keepers can merge the common as part of their holding.

6) We support introducing the proposals without undue delay. Currently, farmers cannot apply for new SOAs, which is placing a burden on the industry. The proposals would mitigate this.

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