BVA WELSH BRANCH RESPONSE TO WELSH GOVERNMENT CONSULTATION ON THE INTRODUCTION OF QUARANTINE UNITS

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

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

3) We were pleased to have been given the opportunity to respond to the Welsh Government consultation on the introduction of quarantine units following on from our contributions in 2014 in support of the preservation of the six days standstill (6DSS) exemption for visits to veterinary practices. To facilitate this BVA developed a standard operating procedure for ensuring good biosecurity at veterinary practices which was agreed by the Welsh Government. Alongside the maintenance of this essential exemption we are supportive of the proposal which would simplify the current requirements for farmers adopting QUs, by removing the many exemptions currently available but at the same time providing a workable balance between managing disease risks and allowing flexibility to trade.

To what extent do we agree with the benefit of implementing Quarantine Units (QU) to replace current 6-Day Standstill (6DSS) rule exemptions?

4) We agree that in order to continue to mitigate disease risk and spread, simplify the present system and facilitate trade; it would be beneficial to introduce quarantine units (QU) to replace all existing exemptions involving isolation facilities. However, we wish to emphasise that 6DSS rules were introduced to mitigate the risk of outbreak and spread of foot and mouth disease, and consequently QUs must adequately mitigate such a risk and via their approval, management and inspection, form the basis for ongoing dialogue around effective biosecurity. We are pleased to note that the operational rules allow for animals to leave a QU for veterinary treatment provided they (and any new born offspring) return to the QU for the remainder of their 6DSS period.

Proposed Changes - What are your thoughts relating to the proposed QU process?

5) We broadly agree with the proposed QU process and we would strongly support the inclusion of an advisory role for veterinary practitioners in the planning and design of suitable facilities for QUs in order to improve both their initial approval and subsequent inspection by assurance bodies. We propose that beyond the facilities themselves, veterinary knowledge and expertise in disease control may be essential in the development of the inspection criteria, inspection and assessment of the appropriate use of QUs and in addition would contribute to improved general biosecurity awareness and practices on farms considering QUs.
6) In order for "unannounced inspection" visits to QUs to be effective, inspectors will need to know when these premises are in active use for 6DSS of recently arrived livestock. This means that Government would need to be assured that livestock movement reporting systems were fully effective and that farmers using QUs were prompt and reliable at notifying such movements. It would be important to know that the Welsh Government has addressed this issue prior to adopting any new measures.

7) The proposal suggests that electronic notification of animal movements into or out of a QU must take place within 24 hours of the movement. However, we understand that there may be poor and intermittent broadband coverage in isolated rural areas in Wales. We suggest that an alternative option to notify by telephone or text within 24 hours of stock movement is required and should not compromise the ability to carry out spot checks.

8) We suggest that the development of QUs on farms should be supported where possible by the Welsh Government and Rural Development Programme (RDP) funding.

Nature and number of QUs per farm premises – which option should be considered and are there any pros or cons that have not been considered?

9) BVA supports option B – the designation of one QU per farm comprising one or two separate sites operating as one unit i.e. any animals entering either site would restart 6DSS on both sites. This option provides for one indoor and one outdoor site managed under the same County Parish Holding (CPH) number balancing flexibility for the farmer and ease of administration and management.

10) We remain concerned that outdoor QUs may be less effective at mitigating the risk or spread of disease, particularly for airborne diseases, and would suggest that it may be sensible to inspect outdoor QUs more frequently when they are in use to address this.

Changes to the Disease Control (Wales) Order 2003 – do you agree or otherwise with the proposed changes?
11) We agree with the proposed changes and support the maintenance of the exemption for stock visiting veterinary premises.

General comments
12) It is reasonable to assume that small farms and holdings may have an interest in registering a QU to facilitate stock movements between summer shows. If a cost scale is included to facilitate the development of QUs on small farms and holdings there may be an opportunity to improve standards of animal health and welfare through engagement in farm assurance.