BVA response to DAERA Draft Northern Ireland Animal Health & Welfare Strategic Framework

September 2019

Who we are

The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 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.

The BVA's Northern Ireland Branch brings together representatives of local veterinary associations, BVA's specialist divisions, government, and research organisations in Northern Ireland. The Branch advises BVA on the consensus view of the Northern Ireland members on local and United Kingdom issues.

We welcome the opportunity to respond to 'Draft Northern Ireland Animal Health & Welfare Strategic Framework.'

Introduction

We support the initiative taken by DAERA to provide a systematic framework for improving animal health and animal welfare outcomes. This is particularly timely given the challenges and opportunities arising as result of exit from the EU.

We welcome the links to the Programme for Government which places animal health and welfare within the wider context of the strategic direction of travel for the work of government in Northern Ireland.

The suggested 10 years lifespan of the Framework reflects the long-term vision that is needed to make improvements in this area. We welcome the introduction of an annual cycle of planning, monitoring and reporting; and the establishment of a new structure to facilitate stakeholder engagement and oversight of delivery of the framework.

Justification

The section “Why animal health and welfare matters” sets out the justification for the approach taken with the Framework.

This section emphasises the economic as well as environmental and public health justifications for improving animal health and welfare outcomes. While these are all vitally important, it is vital that animal health and welfare are seen as public goods in and of themselves, and not merely ways to meet other goals. As sentient beings, animals are capable of experiencing positive and negative feelings and so deserve consideration and respect.

We would also note that the examples utilised in this section are almost entirely related to production animal sectors. We would ask that within the operation of the strategic framework due attention is given to achieving improved outcomes for companion animals, equines, exotic pet and zoo and free-ranging wildlife also.

Outcomes
We note the following animal health and welfare outcomes for the Framework are proposed:

- We keep our animals healthy and treat them well.
- We have a competitive, innovative livestock industry that contributes to our economic prosperity.
- We protect public health and our food from animal-related disease.
- We take a sustainable approach to the farming of animals that respects the environment.
- We have animal health and welfare safeguards that are widely recognised and trusted.

We welcome the principle position given to the outcome most directly focussed on the health and wellbeing of animals. We then welcome the consideration of animal health and welfare within more public health, economic and environmental related outcomes. We support the inclusion of trusted safeguards that underpin the reputation of Northern Ireland animal health and welfare.

We welcome the inclusion the fourth outcome which incorporates the sustainability and environmental aspect of animal keeping, this is in line with the recommendations of the BVA Position on UK sustainable animal agriculture.¹

**Indicators**

Below these outcomes will sit the proposed indicators. We agree with the inclusion of all of the proposed indicators, but we would suggest that the detail of the indicators is overly focused on production animal sectors. This is understandable given the significance of livestock to the local economy, however, this could result in missing opportunities for improvements elsewhere over the next 10 years. For example, antibiotic usage could attempt to incorporate the companion animal sector, which accounted for 10% of all antibiotic use in 2017 and has not seen the same reductions as the livestock sectors.² It would also be appropriate to include the monitoring of dog bites as these are a major public health issue and relate to animal welfare in terms of responsible ownership and socialisation.

We note that the list provided is not intended to be an exhaustive list of indicators that would underpin the deliverance of the above outcomes. We would welcome an opportunity to expand this list to provide a fuller picture of animal health and welfare with the input of veterinary surgeons.

There is a need to broaden the traditional view of animal welfare beyond measures of physical health to incorporate equally important determinants such as behavioural opportunities and appropriate social contact. We would therefore ask that consideration be given to incorporating indicators of positive animal welfare within the Framework.

As the consequences of EU exit emerge, it may also be appropriate to consider additional indicators that reflect the changing landscape. Where there are opportunities to coordinate activity with other jurisdictions these should also be built into indicators.

**Guiding Principles**

We support the proposed guiding principles contained within the document, in particular we welcome the commitment to embed a One Health approach in the Framework.

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¹ https://www.bva.co.uk/uploadedFiles/Content/News,_campaigns_and_policies/Policies/Farm_animals/BVA-Position-on-UK-Sustainable-animal-agriculture-FULL.pdf
Implementation - annual planning, monitoring and reporting cycle

We support the production of an Annual Delivery Plan setting out the priorities and related actions for delivery in that year. Creating a new way of working with a managed cycle of delivery, monitoring, evaluation and reassessment of deliverable objectives for the following year appears to be a sensible approach for DAERA and stakeholders to achieve improvements in animal health and welfare.

Oversight and Stakeholder Engagement

It is proposed that a partnership body should be established to support governance, comprising government and non-government stakeholder representation. We welcome the structure that has been proposed to manage and oversee partnership working. Veterinary expertise and input at every level is a necessity, we strongly recommend this inclusion. Veterinary Officers and private veterinary practitioners (PVPs) provide clinical expertise as well as a wealth of local knowledge and facilitate working in partnership with farmers, animal keepers and pet owners.