**FVE CONSULTATION ON FOOD CHAIN INFORMATION GUIDANCE AND HERD HEALTH PLANNING GUIDANCE – BVA RESPONSE**

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 is delighted to be invited to respond to the Federation of Veterinarians in Europe (FVE) consultation on two documents produced by the FVE food safety working group - Food Chain Information (FCI) guidance and Herd Health Planning (HHP). We broadly support the two documents, which are a positive step forward, and we propose a number of suggestions to strengthen the requirement for veterinary input.

3) The HHP document provides a list of actions that are integral to achieving herd health planning objectives and are likely to already exist where there is a good relationship between the veterinary practitioner and the farm. BVA believes that the document should stipulate a greater requirement for regular veterinary input to assist less engaged units in achieving these components too. In particular, we believe it is necessary to emphasise that a HHP document is a dynamic document that should be regularly referred to and updated in liaison with the veterinary practitioner.

4) Lines 86 and 87 of the HHP document make reference to the need to include good handling practices for veterinary medicinal products and feed additives. We think it may be useful to make reference here to the Responsible Use of Medicines in Agriculture (RUMA) guidelines and European Platform for Responsible Use of Medicines in Agriculture (EPRUMA) guidelines.

5) Line 111 of the HHP document states “Appropriate financial resources should be also allocated.” We think that this point may be improved by including a reference to whom should allocate financial resources, e.g. ‘Appropriate financial resources should also be allocated by the farmer.’

6) Within the checklist for herd health planning, the HHP document makes reference to animal housing (line 147) and feed and water supply (line 156). In both cases we believe it would be helpful to make reference to space requirements of animal housing and space requirement for feed and water supply.

7) The FCI guidance contains a brief paragraph (line 218) on veterinary involvement with live animals. We believe that there is great scope to elaborate on the veterinary role on farm, especially with regard to timely and effective communication forward and backward between the veterinary practitioner and the official veterinarian. We understand that in the UK there is poor coordination between the Food Standards Agency, the Animal and Plant Health Agency (APHA) and the farmer’s private practice vet and suggest that better flow of communication, especially where actions at farm level may mitigate human health risk, is essential. We also believe that the
guidance should make reference to the necessity for independent veterinary official controls free from influences such as commercial interest.

8) Within the FCI guidance a number of biological hazards are identified and BVA believe that whilst these are important diseases of public health significance their identification at the abattoir does not necessarily reflect the situation on farm and in some cases there is a significant lack of information available for farmers to address the risk posed by these hazards. We suggest that if sampling is to take place that information on the source of the sample is provided, the action that will be taken on carcasses that sample positively made clear and how the information gathered can be used. Furthermore, we believe that dioxins and polychlorinated biphenyls (PCBs) are also relevant in sheep and that these hazards require further discussion on risk management.

9) BVA believe that the FCI guidance could make suggestions on what more can be done with animal health information that is already gathered. We suggest that there are opportunities for strategic and targeted monitoring of a range of animal health problems at the abattoir, but it is essential that this information is reported back to the farmer and the private veterinary surgeon.

10) Within the document there are references to what information should be submitted as FCI. BVA believe that across species the detail of the FCI requested is crucial for the information to be meaningful and useful in terms of food safety.

11) Both the HHP document and the FCI guidance make references to ‘animal health’. BVA are strongly of the opinion that these should be changed to ‘animal health and welfare’ in all cases because the two are inextricably linked.

12) In conclusion, BVA broadly support the HHP document in view of the amendments above. We believe the principle behind the FCI guidance is positive, but the document lacks detail and could benefit from major review and improvement.