**INTRODUCTION**

Thank you for your invitation to consider and comment on the Animal Health and Welfare Strategy Implementation Plan for England. The BVA welcomes the publication of this Plan, which represents an important opportunity for veterinary surgeons, farmers, politicians and the general public to work together to shape the future of the AHWS. In general we find that the work areas have been broken down in a helpful way, that the plan is of a manageable length, and that the right amount of information is provided and is clearly laid out. However, the Association is concerned at the apparent lack of provision for the direct financial input, required from Government to bring the Plan together. We believe that it is unrealistic to expect that the funds required can be found from existing budgets.

**MANAGING THE STRATEGY AND DECISION MAKING**

1. The BVA welcomes the formation of the Strategy Steering Board, which, if it is to be effective, must represent the interests, and aspirations of all strands of veterinary practice. In implementing this plan DEFRA will require the expertise of veterinary surgeons employed in areas such as Government, academia, industry and private practice.

2. The intention to develop a comprehensive, validated and well maintained system of disease profiles as a foundation for discussion and decision making is welcome. The Association is particularly supportive of the concept of the Business Assurance Groups and the emphasis on sharing information. However we do have a number of concerns, as follow:
   
   (a) there is undue emphasis on data analysis without reference to a methodology for data collection at farm level; and
   
   (b) those developing disease prioritisation profiles should include veterinary surgeons with practical experience of dealing with a wide range of diseases at farm level.

3. The BVA accepts that industry must develop a greater ownership of and financial responsibility for the risks associated with animal disease, but we are concerned by the possible implications of New Initiative 14: Cost-sharing. A clearer understanding of the costs and benefits of animal health and welfare is a worthy objective which the BVA supports, but the use which Government then makes of the information will be of critical importance and could, if wrongly applied, undermine the strategy objectives. Care should be taken to ensure that the poor financial viability of many livestock farms, in marginal rural areas and elsewhere, does not fatally weaken the strategy.

**PREVENTION AND CONTROL OF ANIMAL DISEASES**

4. In the light of EU enlargement and in order to reduce the risk of the introduction of animal diseases from other countries, the BVA suggests that it may be appropriate to consider the introduction of stricter rules regarding importation of animals and animal
products from mainland Europe. Within the UK it may be worth introducing stricter rules to govern the movement of animals between farms, through dealers and to market.

5. The BVA is supportive of any action against illegal imports and would encourage more rigorous import controls as well as the routine use of dog teams to deter smugglers.

6. The Pet Travel Scheme appears to be working well, but we would like to raise the following points:
   (a) the Scheme, while effective in minimising the risk of rabies entering the country, does not address the risk of the entry of exotic diseases to which our dog and cat populations are not currently exposed; and
   (b) the general public still appears to be confused about the difference between the Pet Passport Scheme and normal export certification.

7. The Veterinary Surveillance Strategy represents an opportunity for a more appropriate use of veterinary time and skills in providing advice and introducing control strategies to prevent, as well as detect, disease and other welfare problems and it would also demonstrate a practical commitment by the Government to improved veterinary surveillance.

8. In line with the recommendations of the EFRACOM Report the BVA believes that veterinary surgeons should visit all livestock farms on a regular basis and we recommend that visits be made at least twice a year. These visits could be tied to, for example, TB testing or a Veterinary Herd Health Scheme. The BVA considers that as this Veterinary Surveillance Strategy is a new initiative it may be appropriate for the Government to provide funding to promote the concept and kick start the project.

9. On the issues of livestock identification and tracing and the export of livestock, the BVA would like to highlight the following:
   (a) there is a need for greater liaison between DEFRA and veterinary surgeons in equine practice to address the many problems associated with the Horse Passport regulations and the consequent burden on equine practice; and
   (b) the need for greater liaison between practising veterinary surgeons and DEFRA on:
      (i) influencing EU sheep identification proposals; and
      (ii) reporting on the practicalities of using electronic identification.
   (c) with regard to “Delivery” on page 29, we presume that the SVS “receive” rather than “issue” applications from exporters.

10. The BVA is encouraged to note that veterinary medicines are now included in the Strategy as a specific New Initiative. We strongly recommend that the effects of the proposed key changes to veterinary medicines legislation as a result of the Marsh and Competition Commission Reports and Review 2001 should be recognised by Government in the development of this Strategy. Furthermore, it should be borne in mind that changes in European legislation will have a more profound effect on veterinary medicines legislation than the recommendations of the Marsh or
Competition Commission reports and that some of these recommendations are not even consistent with current EU legislation.

11. The importance of “Emergency Preparedness” was demonstrated by the FMD outbreak of 2001. The BVA recommends that:

(a) farm practices and the State Veterinary Service should be aware of how they will work together in containing any future outbreak;

(b) comprehensive, flexible, user friendly contingency plans should be developed and regularly reviewed;

(c) all sections of the Profession could usefully undergo prior training including practical exercises; and

(d) in any emergency involving animal disease, the veterinary surgeons involved in control be adequately remunerated for their services.

12. The outlined endemic disease programme should place more emphasis on the importance of TB testing and the role of the veterinary surgeon. In some cases the TB test is the only time the veterinary surgeon visits a farm and sees the whole herd and the BVA would like to see the TB test becoming part of a programme of on-farm surveillance.

13. The National Scrapie Plan is well under way and appears to be successful but care must be taken to ensure that the Ram Genotyping Scheme does not lead to a serious depletion in the gene pool in certain pedigree breeds.

14. The BVA would encourage DEFRA to persevere in it’s efforts to allow the resumption of British beef exports, and would like to see the OTMS controls in the UK progressively relaxed, not least because the maintenance of controls which are no longer justified must weaken the argument for relaxing export controls. We strongly support the aims of the BSE programme.

PROMOTION OF ANIMAL HEALTH AND WELFARE

15. The BVA strongly supports the conclusions of the EFRACOM report and has already adopted a co-coordinating role in identifying veterinary representatives to participate in the DEFRA working groups that will gather facts on the supply of veterinary surgeons in rural areas and provide answers to the questions asked in the EFRACOM report.

16. As part of the integrated approach to disease prevention through farm health planning under Initiatives 7, 8, 9a, 11 and 12 it is proposed that a working group be set up to consider various issues. Some of these issues are being considered by other working groups under other sections of the strategy and the BVA is concerned that there may be some duplication of effort. We suggest that this working group adopt a coordinating role for the other groups in the interests of efficient use of resources.

CONCLUSION

17. The BVA is broadly in agreement with the direction and focus of this Implementation Plan and is supportive of the intention to develop policy to improve animal health and welfare subject to the concerns outlined above.
NOTE

The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom and represents over 10,000 members. Our chief interest is to protect and promote the interests of the veterinary profession in this country and we therefore take a keen interest in all issues affecting the veterinary profession, be they animal health, animal welfare, public health or employment concerns.