INTRODUCTION

The BVA is grateful for the opportunity to comment on DEFRA’s Avian Influenza (AI) and Newcastle Disease (ND) Contingency Plan, which are made without sight of the complementary VIPER instructions, which have not been circulated. The Association welcomes and is somewhat reassured by any effort that is made to construct a plan that is robust enough to deal effectively with outbreaks of AI and ND.

GENERAL ISSUES

1. The BVA believes that it is crucial that the contingency plan is designed and written so that it can be introduced and activated with necessary speed. Experience here in the UK and in other countries has shown that prompt diagnosis and action are the key factors in reducing the economic and social impact of outbreaks of this nature.

2. Whilst acknowledging the importance of the Contingency Plan, the BVA feels that DEFRA must strengthen awareness of the effects of these diseases in “quiet” periods and not just during outbreaks. DEFRA must:
   (a) ensure wide distribution and awareness of the DEFRA biosecurity policy for AI and ND by all poultry keepers, including backyard and hobby flocks;
   (b) promote the need for vigilance and prompt reporting of suspicions of disease especially by smaller producers and hobby farmers;
   (c) consider stockpiling effective disinfectants and vaccine;
   (d) consider appropriate slaughter methods and availability of the necessary hardware for slaughter as a matter of urgency;
   (e) consider how best to utilise the expertise of members of the British Veterinary Poultry Association (BVPA), both locally and nationally, since these individuals have a fundamental knowledge of bird health and company structure in their areas; and
   (f) review this Contingency Plan regularly, we suggest annually.

3. The BVA notes that the Contingency Plan includes an option to seek assistance from the armed forces in the event of an outbreak of AI or ND. We presume that the role envisaged is similar to that provided during the 2001 FMD epidemic, concentrating on the logistics of planning and disposing of large numbers of carcasses. However, the army does have a veterinary corps which could play a more professional role in an epidemic, and we would therefore seek to clarify whether:
   (a) specific training in areas such as disease recognition and diagnosis and/or IT and data systems will be offered by DEFRA and supported by the MoD in
order to strengthen the ability of the Royal Army Veterinary Corps (RAVC) to contribute to an emergency response;

(b) RAVC personnel will undergo this training along with their DEFRA colleagues; and

(c) RAVC will be involved in contingency exercises.

SPECIFIC ISSUES

4. There are a number of specific issues we would like to raise in relation to the Contingency Plan as follows:

(a) on page 10 it is stated that AI is most likely to be introduced by “...contact with migrating wild birds...”. The risk from other routes such as imported commercial poultry or exotic avian species, though less, should not be ignored;

(b) in paragraph 1.13 the objectives of Operational Command are outlined, they include liaising with “key stakeholders and operational partners” who are listed at Annex K. Neither the veterinary profession (other than local practices) nor the poultry industry are included in the list of stakeholders and the BVA feels that this is a serious oversight; both the BVA and its specialist division, the BVPA, should be included;

(c) whilst acknowledging that the initial action on confirmation of AI or ND must be set out carefully as in paragraph 2.19, the BVA would like to emphasise the importance of implementing movement bans without delay, this should be facilitated rather than hindered by the information cascade;

(d) “captive birds” are referred to but not defined in paragraph 2.21, the BVA believes that whatever the definition these should not be moved within an infected area;

(e) paragraph 3.27 states that “DVMS will engage with local stakeholders as part of their routine emergency-preparedness”. It is the BVA’s view that local poultry vets should be considered as key local stakeholders;

(f) the proposed enhanced training for LVIs for both everyday and emergency situations that is referred to in paragraph 3.29 is a welcome initiative which the BVA hopes will not be hampered by the ongoing delays with the current review of the LVI system;

(g) in relation to the vaccination for ND referred to in paragraph 4.2, the BVA would like DEFRA to clarify whether it is intended to stockpile this vaccine;

(h) the BVA would support the establishment of a welfare forum as outlined in paragraph 4.4. We are however concerned that there appears to be no provision for representation from the veterinary profession or from FAWC;

(i) the BVA agrees that anticipation and avoidance are key factors in contingency planning (paragraph 4.6). It must be borne in mind however that poultry keepers should be encouraged to anticipate and avoid problems at all times, not just during outbreaks of disease;
in paragraph 4.6 it is stated that “...broilers and spent hens in infected areas will be permitted to move to slaughter and as such a welfare disposal scheme would not be required for these birds.” The BVA feels however that the welfare disposal scheme may well be required if the infected area does not have the necessary slaughter facilities, since the movement of live birds from an infected area is inadvisable and spent hen slaughter facilities are specialised and relatively few in number;

point of lay birds are referred to in paragraph 4.7; the BVA presumes that this includes turkey, layer and broiler breeders;

also with regard to paragraph 4.7, we feel that the title veterinary surgeon is preferable to “vet” in a document such as this;

clearly there will be implications for livelihoods, especially for independent hatcheries of point of lay pullets, if birds are slaughtered under a disposal scheme with no compensation. Therefore, the BVA would like to see further consideration and consultation on paragraph 4.9;

the BVA notes, in paragraph 4.12, the consideration that is being given to “...the situation where birds die between the time of report / suspicion and confirmation of disease.” This underlines the importance of prompt confirmation of disease and of slaughter;

paragraph 4.18 refers to changes in the current disposal hierarchy. It is important that this information is distributed efficiently particularly to small holders, pet bird keepers etc. as they may not be aware of current DEFRA guidance. This information should be distributed in “quiet” periods as well as during outbreaks;

paragraph 4.26 refers to transport but the BVA feels it should be stipulated that vehicles are:

(i) leak proof;

(ii) sheeted; and

(iii) capable of effective disinfection

but appreciate that these criteria may be stipulated in the VIPER instructions;

the BVA is concerned that on-farm burial as referred to in paragraph 4.31 may not be practical within the required timeframe;

it is important to stipulate that cleaning and disinfection is carried out with appropriate and effective products (paragraph 4.44);

awareness programmes, mailings to poultry producers and articles in the veterinary and farming press as referred to in paragraph 5.12 must be properly targeted and effective. The BVA feels that this is an area where the veterinary profession should be involved;

the BVA is concerned that the Association and its specialist division, the BVPA, are not included on the list of stakeholders in paragraph 7.22, we are also concerned that FAWC is not included; and
(u) the biosecurity guidance at Annex I and Annex J should be distributed more widely amongst large and small producers in “quiet” periods as well as during outbreaks of disease.

**CONCLUSION**

5. The BVA welcomes the intention to develop a robust and effective Contingency Plan subject to the concerns we have raised. We feel it is particularly important that the plan is designed so that it can be implemented with speed and that DEFRA strengthens the awareness of the effects of these diseases and the importance of biosecurity during “quiet” periods as well as during outbreaks.

**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.