INTRODUCTION

1. 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. We welcome the Government initiative to develop an animal health and welfare strategy for Great Britain and look forward to participating constructively in achieving this objective.

2. Protecting and promoting the health and welfare of the nation’s animal population is the raison d’être of the veterinary profession. Great Britain’s animal health status has traditionally been held in high regard internationally although events in recent years have called this into question in some areas and it is to be hoped that the production of a wide ranging, long term animal health and welfare strategy will facilitate the improvements necessary to recover and then maintain a high animal health status, whilst maintaining our tradition of protecting the welfare of the animals kept in Great Britain.

3. The consultation document seeking views on what an animal health and welfare strategy should contain has been widely considered within the BVA and its representative divisions and has also been discussed by the Association’s Council and Veterinary Policy Group. The comments which follow are based on those made during these discussions and upon written comments received from various territorial and specialist divisions of the Association.

KEY ISSUES TO BE ADDRESSED BY THE ANIMAL HEALTH AND WELFARE STRATEGY

4. The BVA believes that the Government should adopt an animal health and welfare strategy that is simple and achievable, with clear objectives relevant to the different species. We also believe that the strategy should be flexible and capable of evolving to ensure control of endemic, exotic and emerging diseases.

5. Consideration of the questions posed in the consultation document has identified a number of key issues which the Association believes any animal health and welfare strategy must address. These can be summarised as follows:

- the strategy should cover all domesticated animals, including farmed livestock and fish, horses and companion animals and birds (including racing and showing pigeons), with a more limited application to wild animals;

- it should be made clear that primary responsibility for animal health and welfare lies with the animal owner/keeper. However, this must not be allowed to be used by others to absolve them of their responsibilities. This includes government who have a duty to protect GB from specific defined diseases;
• animal health and welfare are inextricably linked and the veterinary surgeon, as the guardian of both, has a key role to play in the development and successful implementation of any health and welfare strategy;

• the strategy must require Government to ensure that veterinary services are available across GB to everyone who wishes to use them;

• there should be a system of licensing or approval for all holdings where farm animal species are kept, irrespective of whether or not they are kept for commercial purposes. A similar licensing or approval system should also operate for premises at which companion animals and horses are kept for commercial purposes, if not the licensing of all horses, cats and dogs;

• animal identification, veterinary health planning and preventive medicine must be an integral part of the animal health and welfare strategy;

• animal health and welfare must be built upon a scientific base. The strategy should seek to support and enhance this base and to liaise with other stakeholders in GB research;

• this is an opportunity for a positive image of the British livestock industry to be promoted and should be used to gain a competitive advantage. It should not result in measures which disadvantage British farmers in comparison to their global competitors;

• there is already a wealth of legislation relating to animal health and welfare. The strategy should not introduce additional unnecessary legislation but seek to utilise that which already exists to best effect;

• the strategy should seek to reduce risks to public health from all animal species;

• the strategy must seek to achieve and maintain a high health status for the animal population of Great Britain;

• the strategy must include contingency plans for handling outbreaks of highly infectious disease which must be regularly reviewed; and

• an Animal Health and Welfare Forum, independent of Government, must be introduced to drive the strategy forward.

REPLIES TO SPECIFIC QUESTIONS

Q1: Do you agree that we need a more strategic approach to animal health and welfare in Great Britain? If so, what do you think a strategy should cover? Do you have any other views on the reasons for a strategy?

6. The BVA welcomes the intended introduction of an animal health and welfare strategy. In the past, animal health and welfare issues have tended to be tackled as they have arisen with little apparent attention paid to the overall animal health and welfare picture in the country. The adoption of a more strategic approach will provide a comprehensive rather than piecemeal focus to the issues, should enable a more effective and efficient use of resources and provide a clear framework for animal health and welfare issues for both animal owners and the public.
7. The consultation document suggests that the animal health and welfare strategy will focus primarily on livestock. Whilst recognizing that governments have hitherto had little or no interest in the health of other animals, the BVA believes that a national strategy should be ambitious and comprehensive. Health and welfare issues pertain to all animals (including birds and fish) and the strategy should apply to them all, irrespective of whether they are farm, companion, sport, zoo or wild animals. Furthermore, it is not only disease in livestock that can have economic, social or environmental impacts nor is livestock disease alone in posing a threat to public health. Understanding the interfaces between diseases of livestock, wildlife and humans is of great importance in scientific studies.

8. The strategy needs to set out clearly the responsibilities of the different stakeholders. Primary responsibility for animal health and welfare should rest with the animal owner/keeper (or with society as a whole in the case of wild animals) and the strategy should say so in unambiguous terms. However, this primary responsibility does not absolve other stakeholders from meeting their own responsibilities, which should be clearly identified. The BVA recognizes that in consulting on the development of the strategy the Government is seeking to encourage stakeholders to accept responsibility for areas relating to animal health and welfare which fall to them, a move which the Association welcomes since it should foster a shared commitment to improving animal health and welfare.

9. Although animal health and welfare are inextricably linked, the strategy must recognize that the links between health and welfare systems are complex and sometimes controversial. The application of science will have a key role to play here, particularly with regard to animal welfare where the development of the strategy provides an opportunity to link welfare and science more closely. The public’s perception of welfare is sometimes simplistic and sometimes ill informed and anthropomorphomic. For example, free range and organic poultry management systems are often promoted as benefiting welfare, irrespective of the fact that one result may actually be the introduction of new diseases. The strategy should seek to avoid being too prescriptive in its application.

10. In terms of Great Britain’s livestock industry, the strategy must take account of the fact that the industry operates in an international environment. Care must be taken to ensure that the strategy does not disadvantage British industry in relation to its overseas competitors, nor should it be allowed to result in the “export” of welfare problems from GB (as may happen when a practice is banned here but allowed to continue elsewhere). The BVA believes that the development of the animal health and welfare strategy, if properly handled, can offer an opportunity to promote a positive image of British farming which can be turned to the industry’s advantage.

11. Finally, the BVA believes that the strategy must continually evolve to take account of new and emerging diseases and should therefore be subject to regular review.

Q2: Is the draft vision (section 10 of the consultation document) a desirable future for animal health and welfare in Great Britain? What is your vision?

12. The BVA believes that the draft vision is far reaching, ambitious and idealistic and provides a good basis from which to start to consider an animal health and welfare strategy. However, we would suggest a number of changes which we believe would improve the vision. These are:

(a) Under “Consistently High Standards of Animal Health and Welfare”:

(i) the first bullet point needs amplification and clarification; reference to “healthy and protected animals” is probably an unachievable objective for wild animals (is myxomatosis to be eradicated?) and even for domesticated animals protection cannot be universal;
in the third bullet point “disease free status” is not applicable only to highly infectious disease, not least because BSE is not highly infectious. We would suggest alternative wording “disease free status in respect of all OIE list A diseases and other diseases where that is national policy, leading to restoration and then maintenance of the country’s animal health status”;

(b) under “Improved Public Health”:
(i) a fourth bullet point should be added viz “a livestock industry which is aware of its role in producing safe food”;

(c) replace the heading “A Better Informed and More Effective Livestock Industry which is” with “Where animals are to be used commercially for food production or sporting purposes, a better informed and more effective industry which is”. Also in this section:
(i) the third bullet point should end after the words “disease prevention”, the remainder being deleted;
(ii) the fourth bullet point should be deleted (as it is now in the previous section where it more properly belongs); and

(d) under “Professional Veterinary Services which are”:
(i) add a new bullet point “available to all who need to use them”. We believe that professional veterinary services should be used by all animal owners and keepers, not just livestock keepers, and are concerned that the present contraction in farm animal practice threatens to leave parts of the country without effective veterinary cover.

13. It may well be that in order to achieve the key, generic targets set out in the draft vision, the finer detail provided at the micro level by the itemised bullet points will need to be adapted for different species. This is a process in which the BVA, through its relevant specialist divisions, would wish to be involved.

Q3: What economic, social, environmental and welfare benefits are you looking for from the Strategy? What costs need to be taken into account? And how should these be balanced?

14. The benefits which the BVA wishes to see arise from the adoption of an animal health and welfare strategy are as follows:

(a) **economic benefits**: a thriving livestock industry which produces safe food and is able to compete in a global market; a horse racing industry which is able to compete with its competitors in Europe and further afield; and a companion animal industry which meets the needs of owners in this country and abroad;

(b) **social benefits**: a general public which is better educated in animal health and welfare issues, more responsible animal ownership and recognition that animal ownership carries responsibilities as well as benefits;

(c) **environmental benefits**: maintaining the diversity of farming practice, e.g. crofting has both environmental and social benefits; and the countryside and urban environments; and
(d) **welfare benefits:** improvements to human welfare bearing in mind the positive role which animals play in society and the recognised link between animal and child abuse.

15. A national strategy will have associated costs, but the extent of these will in part depend on the extent to which animal owners accept their responsibilities. One significant cost might be public education, but it is reasonable to assume that this cost will be more than balanced by the benefits.

**Q4: Can you identify any potential conflicts or risks that might challenge the draft vision?**

16. There are a number of potential conflicts or risks which might challenge the draft vision. In the BVA’s view these include:

(a) conflict between the perceived benefit of implementing the strategy and its cost;

(b) the increasing number of traditional food producing animals which are kept as pets and regarded as such by their owners;

(c) the cost of veterinary education and the relatively poor financial return from farm animal, as opposed to small animal, practice (especially in light of increasing undergraduate debt and top-up fees);

(d) perceptions that animal ownership is a right rather than a privilege; and

(e) the popular view that animals are hairy humans, to be treated as children rather than as animals.

**Q5: How can we build the new contract and make partnerships with stakeholders work?**

17. The BVA believes that the Government has the greatest chance of making partnerships with stakeholders work if it builds and maintains open and effective dialogue at the outset. There is a need to identify who the key stakeholders for the success of the strategy are (rather than simply interested parties) and for them to feel that their contribution is not only listened to but has an effect. These partnerships are most likely to fail if the strategy itself is vague and woolly. The Government therefore needs to ensure that the strategy is simple, clear and achievable and it must organise itself to ensure that meetings and consultations are well planned and organised in advance. The contract should be GB-based but have regional differences in delivery where appropriate. Local stakeholders in addition to national stakeholders need to be consulted to ensure the diversity of circumstances, geographical and managerial, under which animals are kept is considered.

18. The idea that owners are responsible for the health and welfare of their animals is straightforward but will require considerable education of the animal owning public. The veterinary profession should play a major role in carrying this forward.

**Q6: What is your most important long-term animal health and welfare priority? Do you agree with the issues and themes from stakeholder meetings? Do you have any to add?**

19. The BVA’s most important long-term animal health and welfare priority is simply to improve the health and welfare of the nation’s animal population, through the promotion of education and good practice and by the encouragement of responsible animal ownership.

20. With regard to the issues and themes identified within the consultation document, the BVA would like to offer the following comments:
(a) there is insufficient emphasis upon the viability of farming and farm animal veterinary practice and the impact this can have on animal health and welfare;

(b) the issues and themes must recognise that, in order for the strategy to succeed, there needs to be investment into educational and research fields in order to ensure that the required science base is properly funded;

(c) the importance of contingency planning for animal diseases is not addressed;

(d) the need to regularly review and update the strategy is overlooked. The BVA believes that an Animal Health and Welfare Forum, independent of Government, should be established to undertake this role and to drive the strategy forward; and

(e) the licensing or approval of all holdings where all farm animal species are kept (irrespective of whether or not they are being kept for commercial purposes) is an additional measure which should be explored as a way of improving animal health and welfare. Similar arrangements should also be introduced for premises where companion animals, birds and horses are kept for commercial and sporting purposes.

Q7: Your views are sought on the value of animal health plans: do you think this is something that should be expected from all animal keepers?

21. The BVA believes strongly that animal health planning should be expected from all animal keepers, whose own personal responsibility should be emphasised, and, in the case of farmed livestock, there should be compulsory farm specific herd/flock veterinary health plans. These plans can provide a valuable guideline for owners and should be used to promote best practice. They put the emphasis upon disease prevention and, in the case of farm animal veterinary practice, their introduction may provide encouragement to veterinary students and new graduates that there is a future in farm animal medicine. The strategy also has the benefit of promoting and supporting the presence of veterinary surgeons on farms and may well link to the collection of input data under the proposed veterinary surveillance strategy.

22. There may also be value in the promotion of health schemes to accredit herds and flocks as being free of specific pathogens. The fragmented nature of British livestock has prevented farmers from benefiting from schemes which have been widely adopted throughout northern Europe and it may be necessary to adopt and promote measures to encourage their uptake.

Q8: Have we set out accurately the roles of Government, the livestock industry and other stakeholders? Is the current balance of Government intervention right? What are your views as a taxpayer?

23. The BVA believes that consideration of the roles of Government, the livestock industry and other stakeholders is an area which should be within the remit of the Animal Health and Welfare Forum.

Q9: Do you have views on the scope of the strategy and how far beyond farmed livestock and companion animals it should extend?

24. see replies to Q1 and Q2 above.

25. It is important that the strategy includes wild animals since there needs to be greater understanding of how disease behaves in wild animal populations if the protection offered to domesticated populations is to be improved.
Q10: For England and Wales, a commitment was made in the FMD Inquiry response to seek views on the regular reviewing and issuing of progress reports on the state of emergency preparedness: what do you think would be the most appropriate format for these? How often do you think Government should issue them?

26. The BVA believes that reviews and progress reports on the state of emergency preparedness should be issued on an annual basis. They should be linked to surveillance findings and should be issued via the Animal Health and Welfare Forum.

CONCLUSION

27. Animal health and welfare issues have, in the past, been approached by government in a piecemeal manner with insufficient regard to the overall health and welfare status of the country. In addition, government involvement has been largely restricted to farmed livestock, with companion animals being left to the private sector. At a time when recent events have resulted in the erosion of the high regard in which Great Britain’s animal health status was internationally held, the introduction of an overall animal health and welfare strategy should be seen as a welcome measure in focussing attention on the wider picture.

28. The need for the introduction of such a strategy has probably never been greater following the BSE crisis, the Foot and Mouth Epidemic, the extension of the Pet Travel Scheme, the continued spread of bovine TB and the potential threats from exotic diseases such as West Nile Fever and Bluetongue to name but a few. Furthermore the Government is currently progressing work on a number of measures which address animal health and welfare issues, e.g. a new Animal Welfare Bill, the veterinary surveillance strategy, the LVI review and the introduction of biosecurity measures within the livestock industry. The BVA sees the development of an animal health and welfare strategy as fundamental to ensuring that these various measures are effective in bringing about the necessary improvements to the health and welfare of the nation’s animal population.