

Defra response and other responses

Defra response on the Joint (Industry/Government) Working Group Report on sharing responsibilities and costs of exotic animal disease

December 2006

The report, which was published on 12 July 2006, opens the debate on risk sharing arrangements between government and industry. Its conclusions and recommendations represented a major breakthrough in that, for the first time, Government and farming industry representatives in England achieved a consensus around the principles of sharing responsibilities and costs in the event of an exotic disease outbreak. The report is the culmination of the Group's work.

Eight responses were received in all from:

- British and Irish Association of Zoos and Aquariums
- British Cattle Veterinary Association
- British Pig Executive
- Dairy UK
- The Family Farmers' Association
- Meat and Livestock Commission
- Scottish Branch of the British Veterinary Association
- and Tenant Farmers Association

Since the report's 'work in progress' the scope of discussions has extended from the initial focus on exotic animal diseases to a wider consideration of the range of animal health and welfare activities on a GB if not UK basis. A consultation has been published on 11 December 2006 which seeks views on the principles around which decisions on responsibilities and costs in this area can then be made. The intention is to follow this up next summer with a more detailed consultation which sets out Government proposals on what areas of work are appropriate for cost sharing and how decision-making can better involve industry.

As such a Government response to the Joint (Industry/Government) Working Group (JIGWG) report is best reflected by the way in which the Government works in partnership with industry to take forward the wider agenda. In particular the Government view is represented by the principles set out in the recent consultation:

1. Preserving public safety and maintaining confidence both nationally and internationally in UK food production
2. Preserving the principles of the *AHWS* – especially that prevention is better than cure
3. Maintaining and improving capability to deliver policies

4. Sharing responsibilities so that achievement of animal health and welfare outcomes is effective and efficient
5. Sharing costs only where the activity provides a clear benefit or service to industry, taking account of affordability, and of the impact on competitiveness
6. Focus cost sharing where it is most likely to reduce disease risk
7. Responsibilities should be shared at least where costs are shared
8. Accountability for both industry and Government
9. The regulatory burden should be reduced and measures simplified wherever possible
10. Consistency with EC and international developments

The Government fully agrees with the JIGWG recommendation that the overriding objective for sharing responsibility and costs between industry and Government must be to achieve better management of animal disease risks so that the overall risks and costs are reduced. Further, the Government fully agrees that a joint industry and Government approach is the right approach.

Hence, in line with the JIGWG recommendation on outstanding issues and further work, a UK Responsibility and Cost Sharing Consultative Forum has been established to provide high-level input from farming industry leaders. This Consultative Forum, together with ongoing engagement with individual livestock sectors, upstream/downstream industries (such as retailers and abattoirs) and consumers, will be the focus for taking forward detailed discussions on responsibility and cost sharing for animal health.

Other responses on the Joint (Industry/Government) Working Group Report on sharing responsibilities and costs of exotic animal disease

Response from British & Irish Association of Zoos & Aquariums

September 2006

We strongly support the concept of introducing more effective rules for reducing the risk of disease spread. We also support the concept of sharing costs between government and industry. Zoos and aquariums are very much aware of the need for good biosecurity.

We would like to emphasise that although this Report does not directly refer to zoos and aquariums, they will undoubtedly be affected by its outcomes. We therefore ask Defra to remember to include zoos and the exotic animals that they keep as special cases when interpreting legislation. We would also ask that you be clear to distinguish between domestic and exotic kinds and to make taxonomic differences clear.

Response from British Cattle Veterinary Association

October 2006

The BCVA is a specialist division of the British Veterinary Association comprising 1350 members of whom over 950 are practising veterinary surgeons working with cattle in farm animal veterinary practice. Many of our members work at the frontline of veterinary action against exotic disease at farm level and, as such, have a great deal of experience regarding the practical development and application of any control measures.

BCVA regard the development of this initiative to be one of the most important issues facing the UK livestock industry at the present time and welcome an opportunity to contribute to the discussions. This is an area in which the UK as a whole has been somewhat left behind by many other agricultural nations. BCVA support any initiative designed to address the management of exotic disease in an effective and sustainable manner and view that appropriate risk management is key to achieving this. Risks can only be identified and managed if those involved accept and discharge their relevant responsibilities, and this will only happen if systems exist to encourage key stakeholder involvement in a fair and equitable manner. Balancing responsibilities against the resultant beneficiaries is then crucial to covering the costs of the whole process.

BCVA support this document as a starting point toward achieving these goals, but would like to see more emphasis upon enhanced ownership of responsibility at the outset, rather than an apparent undercurrent of shifting costs. More detailed discussions on costs are appropriate at a later stage after the true identification of beneficiaries, and, within this, it must be remembered that any measures at the producer level must be affordable within the scope of an industry currently facing economic hardship. The implications for the outcomes of this 'work in progress' are far reaching and should be fully understood before measures are introduced that may have a seriously damaging effect on the whole industry should they be inappropriately designed.

The veterinary profession is crucial to the development and application of animal health control measures throughout the EC, and BCVA encourage the inclusion of veterinary representation from all aspects of the profession in the future development of this issue to reflect the different needs of specific sectors of the industry. The Report recognises the importance of this issue to the whole of the UK and not just England; BCVA supports this view.

The following comments are presented after consultation with members of BCVA Council.

General Comments

BCVA are generally supportive of the ideas put forward in this document. The authors have done an excellent job of introducing the issues involved regarding responsibility, ownership and costs of future exotic disease outbreaks in the UK.

Many would agree that, traditionally, the cattle sector has been very reluctant to take ownership of disease and issues such as biosecurity. These are often seen by individual farmers as matters for veterinary surgeons to deal with and indeed for Defra to take responsibility for, with the attitude that controls are imposed rather than being for the producers' benefit. The idea that farmers are owners of disease and their own biosecurity because it ultimately benefits their business is one that should be fully supported. However, this will involve a major shift in attitude and one should not underestimate the challenge involved in changing attitudes. If the Joint Working Group can bring the cattle sector on board with these plans, it would indeed be a tremendous achievement.

Ownership of disease is the important concept here.

Chapter 2 Risk framework for managing exotic disease

The Dutch example referred to in 2.10 is an excellent model but, as mentioned above, it would require a fundamental change in attitude, certainly in some sectors of the UK dairy industry, to see this type of scheme being readily accepted in UK.

Chapter 4 On-farm Biosecurity

BCVA wholeheartedly agree with the aspirations of these proposals. The UK cattle industry currently has a poor record on biosecurity at individual farm level. Clear guidelines need to be established that are both simple and easy apply to a number of different scenarios, in keeping with the view that 'no one size fits all'. We would strongly support the notion that campaigns should originate from within the cattle industry. Campaigns from Defra, although potentially excellent themselves, will tend to be perceived as an imposition on individual farmers and often there is a fundamental failure to appreciate that the rules apply to 'my farm'. It is important to canvass farmers about their opinions on biosecurity and discover what matters to them. Extensive market research and testing of any campaign is essential before implementation to ensure it is effective.

Chapter 5 Sharing Responsibilities

5.3 We would urge caution in passing regulatory matters such as holding registration, livestock identification and animal gatherings supervision to the industry at the present time, although it would clearly be a desirable goal for the longer term. The industry is not ready to take this on in an effective manner until the issue of disease ownership has been properly developed and accepted.

Chapter 6 Costs

Clearly some form of industry levy is likely to be necessary. There will of course be objections from within the cattle industry as levys are already collected and this would be an additional levy at a time when the economics of farming are difficult. A retrospective levy could raise problems in that it is human nature to find ingenious ways reducing the numbers of animals registered at the relevant time to minimise any potential levy period. Those farms that have their stock slaughtered out under compulsory schemes could provide difficult cases to impose levy payments on retrospectively.

The concept of a two pronged system involving a prospective levy to enhance biosecurity and surveillance in the absence of disease with a retrospective levy in the event of an actual outbreak is of interest and should be investigated further.

Whilst the precautionary principle is likely to be fundamental to any approach in the control of exotic disease, the apportionment of costs to include all beneficiaries in addition to those at the point of application is very important to ensure fairness.

All this must be affordable to the industry. The imposition of further crippling costs with no tangible benefit will do little to encourage producers to buy-in to the concept.

Chapter 7 Future

Full identification and inclusion of all beneficiaries is critical to the success of this initiative.

Headline Points

The Q&A sheet lists 5 main headline points about which opinion is sought.

In addition to the above BCVA support all 5 of these recommendations in principle, and view the creation of a statutory body as essential to the development, management and administration of any measures introduced. It is important however to ensure that this new body complements the structure of other existing bodies involved in the livestock sector, for example EIG, to prevent any confusion or overlap of responsibilities and to keep red tape to a minimum.

Conclusion

BCVA is pleased to have had the opportunity to add to this debate, and hope that our comments are found useful. These comments have also been submitted to the BVA for consideration in the formulation of their overarching response, and we respectfully recognise the presence of Dr Scott-Park on the working group who has been in frequent contact with us over this issue. We

would be delighted to offer further assistance in due course should it be required.

Response from British Pig Executive

November 2006

BPEX is totally committed to doing all that it can to reduce the incidence and spread of exotic diseases in this country. The detrimental effect of Classical Swine Fever in 2000 and Foot and Mouth Disease in 2001 is fresh in the minds of many in the British pig industry. We are pleased that the report recognises that the cost to producers and processors of such outbreaks far outweigh the costs incurred in eradicating such disease outbreaks.

BPEX supports the view that the responsibility for the control and eradication of exotic disease rests with both government and the industry. We believe that sharing of responsibility and costs in a working partnership between both parties is the right way forward. We support the concept of a new organisation with binding powers to achieve this and would wish to see sufficient pig industry representation in such an organisation. This new organisation will only succeed if both parties accept their responsibilities and act upon them.

Great Britain's position as an island gives it a considerable natural advantage in stopping the incidence of exotic disease. It is the primary responsibility of Government to ensure that exotic disease does not enter the country. We understand that this poses some problems with EU regulations on the free movement of goods. Nevertheless an effective balance between this and the risk of a disease outbreak has to be achieved.

The industry accepts its responsibility in ensuring that if disease is introduced into the country by whatever means then the risk of spread is kept to an absolute minimum. We therefore support the concept that good bio-security is recognised and rewarded and that poor bio-security that puts the whole livestock sector at risk should be discouraged and if necessary penalised. We would be happy to work together to determine the systems that could achieve this.

BPEX recognises that there is pressure for greater cost sharing between government, the EU and industry. We believe strongly that there is a strong case for government intervention and the use of public funds in exotic disease control and eradication. The FMD outbreak in 2001 showed the extent to which the livestock sector contributes to the agricultural economy, the rural economy and the economy in general.

The key issue is how cash costs are distributed. We support strongly the concept that the industry contribution has to be affordable and would welcome contributing to work on this. We are broadly in favour of a cap on industry contributions such as those used in Australia. A cap based on industry turnover on net value added would seem equitable. We also broadly support

different cost sharing proportions depending on the significance of a particular disease to the general public. For example the eradication of zoonotic disease would be entirely financed through taxation while eradication of diseases of limited economic impact would be financed mostly by industry.

We would like to see the UK government make full use of funds for disease eradication available from the European Union. There have been a number of cases where opportunities for EU financing have been taken. We would like to see the sharing of costs being based on a three-way partnership between the industry, government and the EU.

Our preference for the funding of costs from the industry is for a retrospective levy. The pig industry has demonstrated that it can operate such a scheme efficiently when needed within sensible time periods. We also believe that money raised from the pig industry should be used to cover pig-related diseases only. We believe that the pig industry has a generally good record in disease control and eradication and we would wish to see that reflected in levy arrangements. We see no advantage in accumulating large sums of money from the industry that is left idle. It is far better that the very limited profits that the pig industry makes to be invested in improved bio-security.

The introduction of responsibility and cost measures in the UK needs to be in conjunction with the rest of the European Union. Enhancing bio-security measures in the UK could be compromised if the same is not happening at the same time in the rest of Europe. The costs of any outbreak could also put the UK at a competitive disadvantage.

We hope that you find these comments useful in preparing proposals in this area. BPEX is happy and willing to help in the preparation of such proposals to ensure the best outcome for government and the industry. We also look forward to commenting in depth when the formal consultation is announced.

Response from Family Farmers' Association

August 2006

I have received the Joint Working Group Report on this subject and although it is not labelled a consultation paper, it seems sensible to make some comments. Admittedly this is not exactly a family farm issue, and I have not been able to consult my committee because of the time of year, but I feel there are some rather serious points which should be made. I hope to be able to make a more formal comment when the promised official consultation is to hand. These are, therefore, the comments of a working dairy and beef farmer.

The first thing that struck me was that it is not really practical to discuss the prevention of exotic disease arriving in Britain, and the matter of coping with it once here, as if they were one subject. They are two entirely different operations. The former can only be organised by government, and pleas by farmers for more effective action seem to be largely ignored. The latter

concerns farmers only too intimately, although it seems there is now effective legislation to ensure that government has full control.

Therefore it would seem that more farming involvement in policies is desirable. However, I would like it noted that this Association was pleading for vaccination during the Foot and Mouth epidemic, but it appeared to us that this route was effectively blocked by the NFU. NFU officials have since told me that this is not the case; various reports seem divided as to whether there should have been vaccination. There does seem to be a general opinion that the crisis was not well handled by government. I have not managed to discover whether it is now intended that there should be vaccination in the event of another outbreak. The subject seems suspiciously unclear.

In other words, there does seem to have been, and probably still is, considerable confusion about the handling of an exotic disease and I have not noticed anything in this report to suggest that there would be more efficient organisation in future.

A somewhat frivolous comment may be that the phrase 'ownership of risk' is rather confusing. I have noticed that 'risk' is now a very fashionable word, but it seems rather too abstract a thing to be owned. As a cattle owner I worry about the danger of disease actually arriving on my farm.

The Report mentions consequential loss several times. I would like to point out that, as stated, compensation does not cover consequential loss. Quite often consequential loss can be quite considerable. If this is accepted, it must also be accepted that farmers are already sharing the cost of disease. If the new tabular valuations for cattle remain in force, consequential losses will be much greater and more universal.

It is greatly to the credit of the Report that it does mention the problem of affordability. If some form of levy were to be imposed, it would inevitably tip a proportion of farmers – those already marginal – over the brink. It appears that this would be of no consequence to the government, but I would have hoped that the representatives of various sectors of the industry would not give their approval to any such proposal.

This Association is doing its best to protect the interests of farmers who, for one of many and varied reasons, are not financially very secure. We believe that these are the farmers who often contribute much to both local communities and the environment, and we would not wish to see an extra financial burden reduce their numbers still further.

One or two possibly less important points: There is much talk of biosecurity, but no exact description of its form. It is not seriously realistic to suppose that every person who ever goes onto a farm will happily dip his shoes in disinfectant in case there might be a return of Foot and Mouth. Movement records are already heavily policed, as is the disinfection of livestock transport, I believe. Personally I do not buy in stock but keep a closed herd, but I believe those who trade stock are more prosperous. Certain types of

farm depend on the movement of animals. What exactly is it that having to pay a levy would encourage farmers to do to be more biosecure and better 'manage the risk'?

The thought of a 'new statutory body' is pretty alarming. Would it have joint responsibility with HMRC for border control? A wonderful possibility for buck passing here! What would be its relationship with Defra and the newly emancipated SVS? A 'Partnership' no doubt! That word has become somewhat meaningless since it has been so often written with no obvious material manifestation.

I do hope these comments will cause some deeper thinking into how to preserve farming and also discourage the addition of another burden on the occupation.

Response from Meat & Livestock Commission

October 2006

General Comments

MLC strongly endorses the view, expressed by Stewart Houston, the Industry Co-Chair of the Joint Working Group, that reducing the risk and extent of exotic animal disease outbreaks is of paramount concern to all.

We also endorse the view that to achieve this requires the industry and government to work together in new ways and in a new spirit of genuine and continuing partnership. A clear and shared understanding by all of the components of 'partnership' is essential.

There is a valuable opportunity here for constructing a new form of policy development and delivery that directly and meaningfully embeds industry in decision-making structures and processes. Such a new approach is, potentially, a model in other areas.

While red meat markets are at present firmer than for a long while, it is not yet clear that this represents a sustained recovery that will return the industry to profitability, maintain competitiveness and allow much-needed investment in the long term. It should also be borne in mind that there are a number of other developments that threaten to add further costs to industry, including meat inspection charges, cattle passports, sheep electronic identification, and the impact of IPPC on larger pig producers. The tallow burning issue, the complications surrounding the removal of vertebral column from cattle aged 24 to 30 months, the outcome of the Doha round of world trade negotiations, and the size and content of the new rural development programmes are unresolved matters. These issues and developments are on top of the challenges currently posed by cheap third country imports and CAP reform.

In short, any developments that threaten to add – rather than reduce or remove – costs to industry are therefore, in principle, unwelcome.

If a new partnership approach is taken to animal disease, we agree that this will entail the industry taking greater direct responsibility for managing disease risks, and bearing a share of the direct costs of disease controls. Such costs must be affordable, and suitable sustainable funding mechanisms must be agreed. In this connection, we do not believe that levy bodies' income from their levy payers should be used to fund animal disease cost sharing measures.

Getting away from the 'us and them', mutual blame attitudes that have sometimes characterised relations between industry and government when disease outbreaks have occurred is vital. To this end, it is most desirable, therefore, that real progress is made in containing and eradicating bovine TB. This, of itself, would do much to demonstrate the sort of relationship and outcomes that the Working Group is advocating, and would be a valuable confidence-building measure.

The Working Group's report is a starting point. A great deal of organisational, operational and financial detail will have to be agreed in order to resolve the wide range of issues that the report raises. It is important that the impetus is maintained and that the next stages of work are put in hand as soon as possible.

The Context

As indicated, we agree that a genuine industry/government partnership is the right approach. This must:

- Clearly identify respective roles and responsibilities
- Establish a shared policy development, decision-making and delivery structure and process, and
- Identify costs, and agree the sharing of those costs and workable funding mechanisms.

The benefits of this approach are well summarised in paragraph 1.9 of the Working Group's report.

Any new arrangements and structures in this country should be consistent with and be readily adaptable to any new arrangements and requirements that arise out of the review of the EU Animal Health Policy. In this connection, it will also be important to agree on what arrangements cover exotic and/or endemic diseases. As the Working Group recognises, its considerations provide a useful basis for influencing the shape of future EU Animal Health Policy.

We believe that this new partnership approach should be carried out at least on a GB basis, and possibly on a UK basis. The issues and problems are common to all regions of the country. Disparate approaches and organisational and financial structures across GB/UK would be inefficient and

confusing, given the flow of animals across borders for production and to slaughter.

Enhancing On-farm Biosecurity

We agree with the Working Group's conclusion that the differing nature of exotic animal diseases, characteristics and management issues in the various livestock species sectors means that 'no one size fits all'.

Nevertheless, across the livestock sectors there are common principles that should underly producer attitudes to biosecurity, as well as approaches to reducing and managing disease risks (eg HACCP-type approaches) and to controlling disease outbreaks when they occur.

We strongly agree that inculcating a strong culture of on-farm biosecurity as a fundamental day-to-day element of good management practice by producers is most important. The industry itself has the central role to play, through information campaigns, farm assurance schemes, and training. As the Working Group notes, there is also scope for industry and government to work together to incentivise risk reduction behaviour by livestock keepers.

In principle, the development of new national rural development programmes for the period 2007-13 under the EU Rural Development Regulation provides a vehicle for encouraging active on-farm animal health planning, a key component of disease risk reduction strategies. We note that within the Land Managements Contract Menu Scheme under the existing Scottish rural development programme, there is provision for assistance for the development of on-farm animal health and welfare plans. There may be merit in replicating such provisions throughout GB/UK.

Sharing Responsibilities for Managing Exotic Disease Risks

We note the Working Group's recommendation to establish a new statutory body for sharing responsibilities and costs for exotic animal disease covering the development and delivery of disease control policies and handling disease outbreaks.

The experience of the FMD outbreak in 2001 highlighted the valuable role that industry itself can play in planning for and dealing with disease outbreaks, as well as in disease prevention in the first place.

The disadvantages of creating a new body are probably outweighed by the benefits of bringing more focus, applying resources more effectively and binding together industry and government to provide more effective planning, decision-making and delivery in this area. Clearly, there are a number of issues to be decided with regard to the structure, operations and budget of such a new body, as well as its remit and level of authority across GB/UK.

Sharing the Cost of Managing Exotic Disease

The level and method of funding of any new cost sharing arrangements, and their administration are critical and potentially contentious issues.

From the outset, it is important to distinguish between the following costs:

- The costs associated with reducing the risk of disease at the individual farmer and industry-wide levels (surveillance, border controls, on-farm biosecurity, animal identification and movement rules)
- The direct costs associated with managing a disease outbreak when it has occurred, and clearing up after it has ended
- The costs of disposing of animals on welfare grounds where this is necessary in the circumstances of a particular disease outbreak
- The consequential losses incurred in a disease outbreak.

There must be clear agreement on who is paying for what and when.

A market-based approach, such as insurance, has some attractions in principle; for example, insurance rates can readily be varied to incentivise individual behaviour. However, the paucity of existing insurance products in this area, the lack of relevant experience on the part of insurance providers and the unknowns surrounding the likely scale and frequency of exotic animal disease outbreaks, as well as the losses arising from them, make the insurance industry reluctant to venture into this area. Any insurance-based approach would, therefore, be likely to be expensive, certainly in the early years.

In principle, in relation to risk more generally, other possible financial instruments include self-insurance (the Working Group notes this), guarantees or deposits, compensation funds of various types, and the use of capital markets. Some of these may or may not be appropriate for the purposes of funding animal disease cost sharing arrangements, but there may be some merit in considering their relevance.

At this stage, we are inclined to agree with the Working Group's conclusion that some kind of compulsory levy is probably the most practicable and simple way of generating funds to cover the direct costs of control measures and compensation once a disease outbreak has occurred. However, of themselves, levies - especially if applied on a flat rate basis - provide little incentive for individuals to alter their own risk reduction behaviour.

We note that the Working Group did not reach a consensus on whether any levies should be applied on prospective or retrospective basis. Clearly, this issue will require further consideration, including, we suggest, taking into account the experience of other countries where levies apply. However, given the UK's experience of disease outbreaks and the unknown factors at the

onset of such outbreaks, a retrospective approach may be more appropriate. A retrospective approach would also avoid leaving funds lying idle until a disease outbreak actually occurred.

We also agree with the Working Group that any cost sharing arrangements must be affordable by industry. Further examination of the funding issue should therefore include consideration of whether there should be a cap on industry contributions to any cost sharing arrangements.

We agree with the Working Group's conclusion that any cost sharing arrangements should not cover consequential losses (although there is merit in further consideration of the treatment of farmers directly affected by animal movement restrictions). Instead, here, there is a need to involve the private insurance industry and to encourage it to develop and market a wider range of suitable products. Again, the experience of other countries where there is greater use of insurance and other financial instruments, not just in the agriculture industry, may be instructive.

In principle, existing arrangements for collecting levies by levy bodies could be a vehicle for collecting funds. But, following the very thorough independent review by Rosemary Radcliffe, in which she reaffirmed the need for statutory levies to fund levy body activities to address market failure, we do not believe that the levy bodies' income from their levy payers should be used to fund animal disease cost sharing measures.

Outstanding Issues

The wide range of issues that the Working Group's report raises, some of which remain outstanding, clearly points to the need for continuing industry/government engagement through some kind of joint group that will maintain impetus, reach decisions, command the attention of ministers and policy makers, and lead to concrete outcomes.

MLC Role

Federal MLC is most willing to provide assistance in this important matter where this is considered to be appropriate and helpful.

Response from Scottish Branch of the British Veterinary Association

September 2006

BVA members in Scotland wish to comment on the above consultation since it appears that sharing responsibilities in the event of exotic disease outbreak may be more difficult than sharing costs, although if stock owners are expected to replace compulsorily slaughtered animals without some compensation it is unlikely that re-stocking will ever take place. It would also be impossible in future to instigate a contiguous cull in the absence of clinical disease without full compensation. Any reduction in livestock numbers or

units with livestock could adversely affect the economic viability of rural areas in Scotland and also the ability of landowners to sustain the environment.

The major considerations in this new approach to cost sharing have to benefit all parties involved without jeopardising existing businesses, public health and the economic health of the nation. Animal welfare must be a major consideration. There are many side issues which have arisen since the last 2001 outbreak of Foot and Mouth Disease and which will complicate the process, an example being the right of the public to roam on land throughout the country. There is also the defining of responsibilities since one person could introduce a disease through carelessness, deliberate action (including bio-terrorism) or accident which had the potential to devastate a section of the livestock industry, but everyone might be expected to meet the costs.

The agricultural industry has expected there to be change after 2001 and has been looking to government to improve disease control measures in the UK both internally and from out-with the country. There is general disappointment that new legislation has not made it illegal to 'knowingly sell disease', for example dispersing at auction a flock or herd with an endemic damaging disease which would then be passed on to all the stock of buyers at that sale. This is a problem which could so easily have been overcome with the new Animal Welfare Legislation and would have introduced measures to prevent the further spread of some diseases, previously notifiable, which successive governments have expected the agricultural industry to singularly address.

The ethos of partnership is that everyone participates and everyone has a vested interest to participate. If government is willing to undertake its responsibilities to prevent the incursion of disease from out-with the UK and to legislate to prevent disease spread within the UK, then everyone will benefit since farmers would see some dedication to the common cause. Under these circumstances an element of cost sharing would be more acceptable.

It is questionable if a new statutory body is required since this will incur extra costs to be borne from the public purse with additional administration and other overheads, money which could be better spent.

Commitment from farmers will be easily encouraged if there is resolve at public and government level to accept that the livestock industry, especially an economically viable one, in the UK is a necessary participant in the sustenance of the environment. At present there is little encouragement from Whitehall to maintain a viable livestock industry in the UK and at a Scottish level although the Scottish Parliament is more supportive it is commonly thwarted by UK and apparently EU rules and regulations.

The beneficiaries of any cost sharing exercise will be the general public, livestock owners and the livestock themselves. As was seen in the FMD outbreak the costs were unevenly distributed with some sectors making major profits whilst others appeared to be working at a charitable level, (a fair comparison would be between those disposing of infected animals and vets diagnosing the disease in the first instance the latter receiving little

commensurate remuneration based on skill and dedication). This type of anomaly should be avoided in future and clear contracts with all involved prepared now and ready to be activated.

BVA members appreciate that this consultation is work in progress and welcome the opportunity to comment further. The following comments are in line with the Chapters in the document.

Chapter 1

It is agreed that the approach in the UK should be across the country and would seek, that if in line with other EU countries, that all countries operate the agreement to the same degree. If the UK operates at a higher level then the chances of disease incursion from the EU remains a high risk.

Chapter 2

Farmers own livestock and are responsible for the health and welfare of these animals. There should be increased incentive to avoid disease introduction through better disease control on farm and at national borders. The latter is in full the responsibility of government and without this being seen to be effective, other mechanisms on farm may be less effective. The word 'biosecurity' should be dropped and replaced with 'animal disease control' since despite all that happened in 2001 there has been little improvement in animal disease control in the majority of the UK and government has done little to actively encourage improvement. The most economically damaging diseases are also the ones which cost the most to import!

The management of disease risk on farm is entirely in the hands of the owner or operator and there needs to be better education of the advantages of managing the risk especially in financial terms. The progress with disease control made in parts of the north of Scotland should be highlighted to the rest of the UK along with the proven financial benefits.

Government should be lobbied to instigate measures to ensure that animal disease is not knowingly sold on any level from on farm private sales to auction sales and dispersals. Many livestock owners are aware of disease presence in their stock but will still sell the animals with disease to others. This should become illegal.

Chapter 3

There should be more stringent and rigorous controls on live animal movements and animal produce into the UK no matter the source. In the past most of the dairy, meat and meat products entering the UK were subject to irradiation treatment which prevented the introduction of many viral and bacterial infections without adversely affecting the produce and with no risk to the consumer – indeed there were advantages in terms of food hygiene.

The presence of weak links in the Border Inspection Post procedures across the ever growing EU should not be an excuse for the UK to permit disease to enter the country. The financial implications of exotic disease incursion are all too well documented from 2001. All steps should be taken to ensure that the inspection measures at UK entry points should be at the highest level. Costings should be determined as a matter of urgency to avoid any further threat to the economic viability of the agricultural industry and the nation as a whole through disease incursion.

The industry would be willing to participate in establishing control measures but any advisory (consultancy) role for the agricultural industry and veterinary profession should be paid for.

Chapter 4

As already stated the word 'biosecurity' should be replaced with animal disease control.

Animal disease control is not a cost and when effective ensures that the economic viability of a livestock unit is more assured and secure. Education is the key. Animal health planning should be more actively encouraged using veterinary practitioners who are the professionals best placed to provide the best advice. All animal health plans should be veterinary animal health plans.

There are increasing examples of the advantages of animal disease control strategies and these need to be highlighted to the livestock industry throughout the country. There should be no excuse for farmers having common diseases on farm which can be easily and cost effectively eradicated or controlled for example Bovine Viral Diarrhoea.

Chapter 5

It is questionable if the establishment of another central body to take responsibility for managing exotic diseases is necessary since it will introduce yet another layer of administration which will not be cost effective. If farmers are to be partners in terms of cost, then all finance involved should be proved to be actively involved in the management of disease and not the creation of another 'ivory tower' within Whitehall.

The disease control measures should be uniform across the UK since there are increasing numbers of farms operated by owners from one country in other countries and livestock and disease have no respect for borders.

The prevention of exotic disease entry to the country is paramount and government has the majority responsibility in this. Farmers and livestock owners should be better educated in the disease risks in the movement of live animals from other countries to the UK and perhaps if such movements are proven responsible for the introduction of disease there is some penalty. Why should all livestock owners suffer because of the actions of a small number of irresponsible people bringing animals into the country without regard for

disease introduction. Any costs to the nation as a result of irresponsible animal movements should be partly recovered from the people involved.

Chapter 6

All cost sharing must be affordable. The farming industry already carries huge financial burdens to allow it to function through levies to various organisations, the increasing costs of animal movement, the expected added costs of meat inspection and disposal of offal, the new costs associated with the food hygiene legislation and animal identification and recording of feedstuffs used and the probable full costs of disposal of fallen stock. Add to this a further levy for exotic disease control and it may be the final straw in an industry already struggling to be financially viable. Government has it in its power to make the livestock industry in the UK profitable but lacks the will. Another levy will see a further reduction in the number of livestock units and this could make the levy on the remaining few even higher.

The livestock industry should not have to pay for any costs incurred as a result of government actions for example the method of animal carcass disposal, changes to the valuation of animals. There should also be clear determination of the responsibilities and costs for determining the presence of disease and veterinary costs should be arranged by annual contract. The actual on farm veterinary presence in some areas of the country may be difficult given the number of farm practices giving up each year.

There should be no cost to the industry if disease is introduced by someone through import of infected produce or contaminated personal effects. The 'right to roam' may prove a source of infection within the country and from abroad from tourists with contaminated food or clothing. There would also need to be better control on the movement of vehicles from out-with the UK which could carry contamination internally or externally (Newcastle Disease in Scotland has been spread by rally cars in the past).

There would need to be a cap on the industry contribution to disease control but as has been seen in the past the capping level can be adjusted by present or successive governments. As stated in principle this should work but is extremely unlikely to do so. Who would decide the capping level?

Chapter 7

The main beneficiaries of disease control are the general public as well as the livestock industry. Consideration should also be taken of animal welfare. In 2001 the major costs incurred were as a result of government actions and the compensation for livestock received by farmers was one of the smaller components of the total sum. Further discussion is needed as to the most cost effective and beneficial way forward during a disease outbreak.

The planning should be UK wide and must involve all countries now.

There is an urgency to the process given the diseases in livestock within the EU at present which could cause serious problems in the UK. The controls at borders should be improved immediately before the outcome of this consultation – horses and stable doors!

BVA members would wish to be involved in the further discussions especially with regard to animal disease control measures and education of livestock owners. Members from all UK countries need to be involved.

Response from Tenant Farmers' Association

October 2006

On an on-going basis, our members most regularly come into contact with the Government on animal disease issues in relation to bovine TB. In relation to that disease then many of the concepts espoused in your Working Group Report are, I am afraid, not very apparent. There has been a severe strain on the partnership between Government and industry not least over the unwillingness of the Government to tackle the issue of badger control which we believe is fundamental to the issue of eradication of TB. The TFA remains sceptical that the Government are serious about assisting the industry to eradicate TB and this, I am afraid, colours our view of the Government's involvement in other animal diseases.

As you will know, the industry recently met to put forward a 9-point plan of action on bovine TB which set out the responsibilities for both Government and industry. It is regrettable that this 9-point plan is currently going nowhere. Unless and until the Government takes a more positive line with the industry in assisting with the control of bovine TB on a nationwide basis, I do not believe it will be possible to have a meaningful dialogue about sharing responsibilities more widely.

The concept of a 'disease levy' is discussed at some length within your report. This would currently be unacceptable to the TFA and we believe the Government has a responsibility to ensure that animals which are compulsory slaughtered receive full and fair compensation for their market value.