

Defra's "**Outline of an animal health and welfare strategy for Great Britain**" – comments from Mary Marshall, Animal Health Policy Coordinator, European Livestock Alliance
26 November 2003

<http://www.defra.gov.uk/corporate/consult/ahwsoutline/index.htm>

Following a consultation "Preparing an animal health and welfare strategy for Great Britain", Defra, the Scottish Executive and Welsh Assembly Government have developed this outline strategy. It provides an early indication of the scope, key principles and core messages that the strategy should contain when it is published in Spring 2004.

An immediate impression on reading this document is that there appears to be no mention of the IAH-Pirbright nor of diagnostic tests, both of which should play a key role in an animal health strategy for Great Britain, and their absence would leave a fundamental gap in the strategy. It would be easier to check that this impression is correct if the document could be supplied in a searchable Word or text format.

In general, this document is a welcome approach, but many of the issues need a fundamentally new approach which recognises that the government, as well as livestock keepers, has a responsibility to protect livestock and the food supply, and that regulations must be based on best and balanced scientific advice as well as on general, informed, consultations. Some specific comments follow:

Section 2.1 The vision

"Good communications and strong relationships between Government and stakeholders mean that information and ideas are shared...."

Comment: this will require a more open approach from Defra, including enabling all stakeholders to have easy access to information.

"Government also acts as a facilitator ensuring that activities and services are joined-up; strengthening the relationship between the"

Comment: This list does not include IAH-Pirbright.

Section 3.2 Animal keepers

"...In order to meet their responsibilities and legal obligations every animal keeper should employ private veterinarians as necessary. If they cannot fulfil their obligations in this way then people should not keep animals and sanctions need to be considered against those who abuse this position"

Comments:

The government also bears the responsibility of not imposing regulations that put animals at unjustified risk – a responsibility to seek and take best scientific advice. Prevention of disease is a concern and responsibility of government, as well as of animal keepers.

Please see my proposal for a new "national health" system for animals based on the Hachaklait system, which would have the benefit of bringing more vets onto farms and lead to a more standardised system of data entry, reducing the paperwork burden currently placed on animal keepers and enabling more effective disease identification and control.

This should be viewed as a long term strategy, as the numbers of vets with the necessary expertise would have to be increased to cope with the demand for their services.

Section 3.14 Balancing costs, benefits and risk

“...Regulation is not the only way: sometimes Government’s role might better be facilitation and communication, or contribution to research.”

Comment: Add: “and uptake of useful new technologies”.

Section 3.15 Disease priorities

“(1) New initiative: To develop with animal keepers, rural and environmental groups, the Food Standards Agency, Departments of Health, and the veterinary profession, a profile for each of the main risks to animal health and welfare.”

Comment: Where is IAH-Pirbright? Where is the “permanently operational Expert Group” with the balanced expertise specified in the EU FMD Directive?

“Once completed, the profiles will be assessed, published and recommendations made to the Strategy Steering Board on the priority to be afforded each disease and the interventions necessary by Government and industry.”

Comment: Who makes the decisions? See comments below on the composition of these groups and their interactions.

Section 4.1 Defining a baseline

“A new surveillance Information Technology (IT) system – RADAR (Rapid Analysis and Detection of Animal related Risk) is proposed. This system would aim to capture and collate accurate, current data from existing sources. Analysis of the data would provide the best possible information for planning control measures and guiding priorities for future surveillance and research.”

Comments:

The baseline can only be established if and when real and accurate information is entered into the database(s) from the front line. See my comments in section 3.2 above and section 4.2 (veterinary surveillance) below.

How many different databases are presently in use? I have heard reports of three. Are they compatible with each other? If not, is it likely that they will be able to share their information within the next 2-3 years?

RADAR should also be designed to link to rapid on-site virus detection tests, for real-time management. I can provide further information.

“ – 92% of the sheep flocks in GB have a problem with lameness (between 6-11% of the national flock in total numbers)”

Comments:

I have been informed (P.A. Roger, personal communication) that the number of sheep flocks with a problem of lameness is an over-estimate (it is closer to 80% than 92%), and that the fluctuating incidence is an under-estimate (between 6-25%).

The statistics for lameness of dairy cattle are worse now than in the 1960s. Are statistics available comparing differing production and management systems?

There is a need to gather more information on the incidence of welfare unfriendly practices and disease incidence, e.g. lameness, mastitis, wasting, and to incorporate this into a strategy.

This welfare need is critical to the acceptance of new regulations introduced by government, and regular review to establish improvement in the incidence of these conditions is vital.

“When establishing the baseline, we also need to measure whether Government resource is being invested in the right areas.

- Government has invested £11.5m since July 2001 in support of the National Scrapie Plan, with a further £10.5m over three years committed by Welsh Assembly Government to extend the plan in Wales.”

Comment: There are better uses for this money than in a plan of questionable scientific merit, which may do far more harm than good, given that the mechanism and form of the transmission of TSEs remains unknown.

Section 4.2 Key Challenges

“Bovine TB Disease prevention and control (Biosecurity) Promotion and dissemination of best practice”

Comments:

Who determines what is “best practice”? Current policy seems to be that Defra consults with stakeholders without first providing these stakeholders with full scientific information, and that veterinary scientific advice is not being followed. As an example, more use could be made of the gamma interferon test to allow for a second test rather than the current policy of slaughtering reactors on the basis of a first test which is known for its high rate of false positives.

Why is “control” here - and elsewhere in this document - taken to be the equivalent of “Biosecurity”, as if there are no other possible control measures? Another example here was the sudden decision to stop the cull of badgers in bovine reactor areas, against even the advice of the modellers! (Christl Donnelly on BBC Farming Today, 20 November 2003). It may not be a simple matter of “all” or “nothing”, i.e. total cull or no cull. Has there been a test to determine whether the rate of infection of badgers is related to their population density? If there is a correlation between high rates of infection where the badger population density is high, then a limited cull to keep the badger population at a level to maintain its health and immunity might be the most effective and acceptable solution.

With regard to responsibility, it can be argued that the Krebs trials might have increased the risk to livestock, not necessarily solely on the grounds for which the reactive cull has been stopped, but on the grounds that by slaughtering within hot spots, RATHER THAN a more scientifically sound strategy of slaughtering in a ring inwards towards the hot spots, TB has spread to previously clear areas. In other words, the design for the reactor areas should have been to start the badger cull in a clear-area ring around the reactor areas, working inwards towards the centre. To have left the outer boundaries of the reactor areas open could be seen as a fundamental, and very damaging, flaw of the design of the Krebs trials.

“Contingency Plans”

Comment: The current contingency plan still takes no account of new technologies for diagnosis, surveillance, tracking and real-time management.

“Foot and Mouth Disease”Implement recommendations of the foot and mouth disease inquiries as taken forward in Government responses.”

Comment: What does “as taken forward in Government responses” mean? That the government will pick and chose which recommendations will be implemented? The Expert Group must be instrumental. Note that the final EU FMD Directive requires that the composition of the Expert Group must be “**balanced**”.

“Illegal imports” Publish and implement a new and updated action plan.”

Comments:

Will this include surveillance support for countries where FMD and other list A diseases are endemic (e.g. to collect and type their viruses), and landing cards and declarations (of countries visited and goods brought in) so that people who are returning from these countries can be checked to ensure that no meat or meat products enter from these countries?

EU and international cooperation is needed to ensure that dangerous meat products are not illegally brought into this country, disguised as legal imports.

“Veterinary Surveillance” *Finalise GB Strategy and develop pilots for the proposed new RADAR ... system”*

Comment: See paper by Mark Thurmond and Sharon Hietala, et al (*Surveillance for detection of foot-and-mouth disease*, in JAVMA, Vol 223, No.5, Sept 1, 2003) for a description of a formal, active FMD surveillance, including:

- new technology for use in cost-effective mass screening and environmental testing;
- embedding FMD surveillance in existing mass-screening systems for endemic diseases;
- strategic targeting of high-risk animals and locations; and
- strategic use of specimens submitted for routine diagnostic testing.

It is essential that we have regular routine collection of diagnostic material on farm by a trained and experienced veterinarian field force (see my comments in section 3.2 above).

Section 5 A new approach

..

...we...believe keepers must meet their responsibilities. These are:

...

- to recognise symptoms of and to report notifiable disease...

...

Comments:

Keepers should have the right to arrange for a diagnostic test, whether to confirm a clinical symptom or to verify that an initial test is not a false positive.

It is the government’s responsibility to prevent initial import of notifiable disease. However should this break down, then we need to have a training system in place that allows animal keepers to recognise the symptoms of and to report notifiable disease and to work in collaboration with their private practitioners, the SVS and Defra, with confidence that their animals will be treated within an ethical, open and pre-agreed framework which allows secondary diagnostic tests to confirm initial general tests prior to slaughter.

Illegal Imports/Contingency Planning/Risk Assessment

Comment: see above on the need for landing cards and declarations.

“We also need to ensure we have a national strategy for exotic animal disease research and that the right science is available for the appropriate modelling and risk analysis of disease control strategies.”

Comment: change to:

"We also need to ensure we have a national strategy for exotic animal disease research **and use of the best technology regardless of where it was developed** and that the right science is available for the appropriate modelling and risk analysis of disease control strategies.

5.1 Role of veterinary practice

Comment: Please see my proposal on a veterinary system (based on Hachaklait model) which would include insurance and data entry.

5.2 Partnership

"...not only nationally, but also regionally."

Comment: The EU must be included. Transboundary diseases need cooperation and sharing of information,

Veterinary surveillance

.... A proposed strategy, "Partnership, Priorities and Professionalism" was issued for consultation at the end of 2002"

Comment: As with other consultations, not all stakeholders were informed about this consultation, and of those stakeholders that were consulted very few feel that their views were noted (on the basis of personal reports from participants at regional stakeholders meetings).

5.5 Investing in the future – training, education, advice and skills

Livestock keepers/veterinarians

Animal Keepers

Comments:

Animal owners need more than "access to the information". The delivery of "training, education, advice and skills" should be subsidised by the government.

Given that it is the government's intent that livestock keepers should be able to collaborate with national services to reduce the level of disease and increase the level of reliability and safety of food sources available to the public, and at the same time, livestock keepers are expected to maintain the countryside and follow environmentally friendly practices, there is a need for a re-introduction of subsidised training to be made available at local level and delivered by experienced practitioners with the necessary skills. The ATB was effective during the 1980s, and has now lost the credibility needed to maintain its effect in the rural community. There is a need to increase the number of regional groups.

Section 5.7 Sharing risks and costs

"... It can be argued that a really sustainable industry would bear the costs associated with animal disease"...

Comment: NO! It is a joint responsibility, and control of animal diseases is for the good of the whole population and therefore the government must share the costs. It is the responsibility of government to ensure a safe food supply to the public.

“It is important that livestock keepers individually and collectively take responsibility for managing the disease risk and with that bear a share of the financial risks.” And entire paragraph on page 33 beginning with “These comments...”

Comment: As above, and note that regulatory controls on illegal imports is the responsibility of the government. Deficiencies, or even accidents, result in disease risk which should not be the financial burden of livestock keepers. Note also that in FMD 2001, much of the spread of the disease resulted from the three days after identification during which movements were permitted; this is the government's responsibility.

Section 6

6.3 What will success look like?

“...Stakeholders in turn have a duty to feed back their comments and ideas to ensure those services meet their needs”.

Comment: Good theory, but not true in practice! Stakeholders need to know that their views will at least be listened to!

6.4 Measuring change

“...We will also be looking at international best practice to benchmark our success against global indicators.”

Comment: Please look at the US Animal Health Association – www.usaha.org, especially the links to meetings, committees and resolutions.

How to comment

*“For copies of the responses please contact either
If you wish personally to view the responses held in any of the libraries above, please telephone and make an appointment at least 24 hours in advance. Small administrative charges may be made to cover photocopying and/or postage.”*

Comment: Copies should be available on-line, as with the Hutton Inquiry. Only then can we have confidence that the consultation process will involve open and informed debate.

Annex A

Themes from the consultation exercise

Background

“An open scoping document; Preparing an Animal Health and Welfare Strategy for Great Britain, Was jointly launched by Defra, the Scottish Executive and the Welsh Assembly Government, on 8 January 2003. The document was sent to around 1,000 stakeholders”

Comment: It was not sent to the FMD Stakeholders Group, and when I asked for a copy after a meeting, it was refused. There must be a better system of notifying and distributing consultation documents, and these documents should be available as hard copies and as Word/text files to make commenting easier.

Main GB themes from the written consultation

“The idea that these stakeholders, working in partnership, would be talking with one voice, bringing with it the advantages of less duplication and a stronger sense of their respective responsibilities and roles, was a strong theme throughout the consultation responses.”

Comment: This cannot be achieved if the stakeholders groups are fragmented with no communication between individual stakeholders and groups of stakeholders. The model of the USAHA or the UK’s Tropical Forest Forum should be considered.

Sector and Interest Group meetings

“Meetings were held with”

Comment: Small and mixed farms, and camelids, are not represented.

Annex B

Management of the strategy

“The key components are:

A Strategy Steering Board ...

National Stakeholder Groups ...

Sectoral Stakeholder Groups ...

An annual GB animal health and welfare conference ..

A science group ...”

“....The aim of such a science group would be to meet once a year, after the annual animal health and welfare conference, to provide a strategic view, looking ahead

Comments:

1. Among the lists of organisations for these groups, there is no mention of IAH-Pirbright. Why?
2. Why will the science group only meet once a year? Why AFTER the annual conference rather than before or during the conference to inform stakeholders?
3. Where is the permanently operational Expert Group?

Annex C

Key delivery agents

The State Veterinary Service (SVS)

The Meat Hygiene Agency (MHS) ...

Local Authorities ...

Comment: Again, no mention of IAH-Pirbright!

Annex F

Notifiable diseases

Comment: Since many of the diseases in this list have never occurred in GB, why not include the OIE List A & B diseases that a) have been identified by the CDC as potential human bioterrorism agents and b) those that are zoonotic agents?

Glossary
Abbreviations, Terms and Organisations

Comment: still no mention of the Institute of Animal Health or of Pirbright!