



Dear Committee

**Invitation to give evidence to the Welsh Parliament's Climate Change, Environment and Rural Affairs Committee in connection with animal health**

**Introduction**

NFU Cymru is the voice of Welsh farming, championing, and representing farmers throughout Wales and across all agricultural sectors. Our vision is for a productive, profitable, and progressive Welsh agricultural industry, capitalising on global opportunities, contributing to the national economy, and supporting thriving rural communities.

NFU Cymru welcomes the opportunity to partake in the CCERA Committees inquiry in connection with Animal Health. Farmers across Wales strive to produce healthy animals for the food chain through ensuring good welfare and reducing disease incidence using a variety of preventative and control measures. Healthy and productive animals also have a vital role in helping achieve the NFU Cymru / NFU ambition to reach net zero agriculture across England and Wales by 2040. NFU Cymru's vision for a new domestic agricultural policy for Wales would see Welsh farmers rewarded and supported for undertaking and implementing measures delivering high animal health and welfare standards.

Welsh farmers have a positive story to tell, alongside a number of statutory requirements that ensure high standards of animal health and disease control over 7,500 beef and sheep farmers in Wales are registered under the Farm assured Welsh Livestock Scheme which stipulates health, welfare and husbandry standards above regulatory standards and includes herd or flock health plans as a requirement of the scheme. Similarly over 95% of dairy farmers are members of the Red Tractor farm assurance scheme which requires herd health plans and welfare performance records to be kept at all times.

Farmers throughout Wales very much value the relationship they have with their private vet and an increasing number of farmers are working proactively with their vet on herd health management to further improve the health status of their livestock and therefore the productivity of their farming business.

NFU Cymru is involved in a number of industry wide groups and initiatives related to Animal Health and Welfare operating in Wales and across the UK. We are pleased to be a member of the recently formed Ruminant Health and Welfare Group that has been established by industry organisations from across the UK with the key objectives of:-

- To reduce or eliminate the impact of endemic diseases with the greatest effect on productivity, climate change and reputation.

- As a country which has substantial agricultural output, to identify and tackle the greatest animal welfare challenges in ruminant production in order to secure the UK's world-leading position on animal welfare.
- To identify and prioritise diseases which can compromise the reputation of UK production including those which may impact on human health and trade status.

We have been invited to provide a written submission setting out any key issues that we would like to bring to the committee's attention, with a focus on Welsh Government's approach to disease prevention and control, and anti-microbial resistance. NFU Cymru is currently involved in a wide range of matters related to Animal Health and as such it is extremely difficult to prioritise but in this short submission we have decided to focus on areas where we feel Welsh Government have most opportunity to influence.

### **Bovine TB**

1. Bovine TB casts a long shadow over Wales' cattle and dairy producers, and NFU Cymru's members are deeply concerned about the failure of successive Welsh Governments to implement a comprehensive TB eradication strategy in Wales.
2. A TB outbreak on farm impacts on all aspects of everyday farm management. It impacts on the marketing of animals (such as the selling of store cattle, breeding animals and calves), which gives rise to cost implications (extra feed, bedding, housing and grazing etc). The loss of adult productive cattle as a result adversely impacts on the productivity of the farm. Incidents of TB also very often lead to significant financial and emotional strain.
3. Bovine TB is a complex disease which must be tackled in the round, this includes cattle measures, biosecurity and addressing wildlife disease reservoirs. In Wales cattle keepers continue to play their part in controlling and eradicating the disease by adhering to stringent cattle movement and testing controls, the issue of diseased wildlife is essentially unaddressed.
4. In November the Welsh Government published its annual statement on the Bovine TB Eradication Programme, within this statement we learnt that there had been a 10% decrease in new TB herd incidents over the previous 12 months, credit should go to the efforts of Welsh farmers, technicians and vets, working with Welsh Government to combat this disease. Whilst the number cattle slaughtered as a result of bovine TB has also fallen, the sad fact is that in the 12 months to September 2020 10,123 cattle were slaughtered as part of Wales' TB control policy. While we acknowledge that the bovine TB picture is a complex one and there are no simple answers to ridding our country of this terrible disease, it is troubling to still see such an enormous number of animals falling victim to bovine TB in Wales. It's also a stark reminder that there is still much work to do if we are going to eradicate this disease from the Welsh herd.
5. If we are to stand any chance of eradicating this disease then a two-pronged approach which includes dealing with the disease in wildlife is vital to successful eradication. This has been shown by experiences across the globe, in the

Republic of Ireland and over the border in England. A peer-reviewed scientific report examining the effectiveness of badger culling in reducing outbreaks of TB in cattle has shown positive results in England. The Defra-commissioned report revealed an average reduction in the incidence of bovine TB of at least 40% in areas of England that have completed at least four years of culling. We also know that just across the border in Gloucestershire, the Downs Report showed a 66% decline in new TB breakdowns.

6. In October 2017 we saw the Welsh Government introduce a regionalised approach to tackling the disease in Wales. This included enhanced measures for chronic breakdown herds, where individual action plans were drawn up with disease control measures aimed at clearing up infection in cattle. In these chronic breakdown herds, Welsh Government committed that where there is evidence of infection in the local badger population, a range of options to reduce the risk of disease spread will be considered, including cage-trapping, testing and where necessary humanely killing infected badgers.
7. As a Union we are deeply frustrated that since the introduction of these individual actions plans, according to the latest figures the number of badgers removed in 2019 was just 35, in contrast to over 10,000 cattle slaughtered for TB control in the year to September 2020 alone. We know from the badger found dead survey that in some parts of Wales as many as one in five badgers are suffering from TB.
8. NFU Cymru has always agreed that where vaccination is available it has a role to play in TB eradication, but at best it can only be used to prevent, and not to cure disease.
9. Whilst cattle vaccination may have its part to play in eradicating bovine TB, it is still thought to be some time away, with Defra estimating that a licensed cattle vaccine will not be available until at least 2023, although we are pleased that field trials have been announced <https://www.nfu-cymru.org.uk/news/latest-news/nfu-cymru-responds-to-announcement-of-field-trials-of-bovine-tb-cattle-vaccine/>.
10. NFU Cymru is very much of the view that if the Welsh Government is serious about committing to the use of the most effective measures to control and eradicate bovine TB, this must encompass addressing the disease in wildlife.

### **Responsible Use of Animal Medicines (RUMA)**

11. In the UK, antibiotic use in food producing animals has halved since 2014 and over the same period the use of highest priority critically important antibiotics for human health has reduced by 75%. This is an extremely positive achievement and testament to industry wide collaboration under the Responsible Use of Animal Medicines alliance that, as a Union, we are proud to be a part of.

12. The work of the industry in reaching the targets set by RUMA have helped to halve sales of antibiotics to treat UK farm animals and achieve the fifth-lowest usage in all European countries, with only the cold Nordic countries where the disease challenge is less, lower.
13. This is encouraging and serves to highlight the very responsible attitude by livestock producers in Wales as in the rest of the UK and is also a reflection of the high health status of our farmed livestock.
14. The UK farming industry has responded extremely well to the targets set by RUMA. The original aim of lowering overall antibiotic use, and, the highest-priority critically important antibiotics (HP-CIAs), has been achieved. The HP-CIA use is in fact down 74% compared to 2016 from an already low level. This is important, as basically it is the same antibiotics groups are used to control bacterial infection in humans as in farm animals. As we face the threat of more resistant bacteria, judicious HP- CIA antibiotic use will increase in significance.
15. New antibiotics will be developed in future, but it is likely that their use will be limited to the human population. Key to having a handle of what is happening are accurate records, so the livestock industry has its part to play. Most sectors are now capturing data on antibiotic use across 90% or more of their sector which is good.
16. Going forward we know there is more we need to do as an industry, we need to examine more closely the overall picture in terms of allocated use. A UK centralised database for ruminants is being developed by AHDB and the Farm Assured Welsh Livestock scheme here in Wales has an electronic version of the medicine record book with a separate column for antibiotics. Such electronic versions will make collation of data even easier.
17. However, this cannot be just about antibiotic use. Disease prevention is always better than cure so work must continue on disease prevention and herd and flock health planning, encouraging proactive animal health planning and building on the good relationships that already exist between farmers and their local vet practices.
18. Reliable, safe, easy to administer and cost-effective vaccines are crucial in disease prevention on many farms for a range of diseases. In the main we have them, but there are instances of market failures where the cost of development *viz a viz* potential returns to manufacturers can make the product commercially unviable. An example is the Louping ill vaccine that is not currently available and is causing issues as infected ticks become more and more of a problem for some farms. There is a case here for some Government support particularly if the diseases are zoonotic.
19. So to conclude the VMD's Veterinary Antimicrobial Resistance and Sales Surveillance (UK-VARSS 2019) report released recently shows that UK antibiotic sales for food-producing animals have halved since 2014 (when sales were

recorded at 62 mg/kg). There will be blips, as no year is the same in the need for disease treatment of farm animals. We must remember this is not a drive to zero use but for appropriate use when necessary under veterinary supervision.

20. Wales' farmers have a great story to tell when it comes to reducing when it comes to reducing therapeutic and prophylactic antibiotic usage. This is in contrast to agricultural systems in some other parts of the world, where there continues to be significant reliance on antibiotic and antimicrobial treatments, often as a means of mitigating the disease pressure created by production systems which are not permitted in this country.

### **Bovine Viral Diarrhoea (BVD) in Cattle**

21. Gwaredu BVD is the industry led programme and the voluntary phase of a programme to eradicate Bovine viral diarrhoea. This was launched at the Royal Welsh Agricultural show in 2017 and testing started in September of that year. NFU Cymru is pleased to be a member of the steering group for this programme and has used every opportunity to promote the benefits of Cattle owners participating in this programme.
22. The key element of the programme, young stock screening of herds, will end on 31 Mar 2021. Alongside this is funding to allow the detection of persistently infected (PI) cattle on positive herds. This PI hunt funding will cease on 31 December 2022 and signals the end of European funded support for BVD eradication in Wales.
23. Circa 11,000 cattle herds are annually bTB Whole Herd Tested in Wales. Just over 8500 or 77% of cattle farms in Wales have participated. 78% of herds have screened negative indicating the cattle have not been exposed to the virus. From the herds screened positive 30546 animals have been antigen tested and 523 PI's identified representing 1.71%. Typically, between 1 and 2% of animals are removed from these herds. The project target remains to have 90% of herds in Wales tested by 31 March 2021.
24. The level of BVD seropositive herds suggests that the gains in productivity are significant (£45 per cow in beef herds and £15000/pa in dairy herds).
25. The introduction of legislation was always envisaged following the end of the voluntary testing assuming that there was evidence to demonstrate support and need within the Welsh industry. Proposals have been submitted to Welsh Government as to how this could operate and be introduced.
26. Linked to the introduction of legislation would be the setting up of Multispecies Wales at EID Cymru. This registration, identity and movement database will track movement of all farmed species including in this case cattle. Gwaredu BVD have been working with the designers to ensure that producers can readily access information on BVD status of individual animals and herds through a gated system.

**Sheep Scab**

27. Sheep scab is a highly contagious and insidious disease. Although the Welsh sheep sector has seen several programmes and initiatives designed to eradicate the presence of this disease over the years, these programmes have, to date, been largely unsuccessful.
28. By utilising recent research and by evaluating sheep scab programmes from other countries, the industry has developed and put forward a proposed strategy that aims to lessen the impact of many of the problems discovered in previous programmes. These include lack of engagement, inappropriate treatment and the spread of disease to contiguous premises.
29. By providing an engagement incentive in the form of free diagnosis and treatment, the proposed strategy aims to increase engagement from more reticent sheep keepers. Furthermore, by co-ordinating treatment with premises contiguous to an outbreak, the proposed strategy aims to mitigate, as far as possible, the oft-quoted issue of re-infection.
30. The strategy also aims to ensure that appropriate treatment is deployed by establishing technical expertise which will oversee the use of both OP dips and injectables. This should provide both treatment accountability and robustness.
31. The use of farmer focus groups will not only aid in identifying risky neighbouring premises but will also allow for the facilitation of wider discussions on flock health planning and biosecurity.
32. This proposed programme therefore aims to work towards sheep scab eradication by improving knowledge and awareness and by reducing the incidence of this disease in Wales prior to discussions on future legislative measures.
33. In January 2019 the Minister committed £5 million of Wales RDP funding for sheep scab eradication, we are extremely disappointed that this funding has still not been allocated to the industry, but in response to a question asked on this matter at the NFU Cymru Conference in November 2020 the Rural Affairs Minister recognised the importance of this money being made available to support the industry initiative. The Minister said that she had to delay the £5 million funding because of reprioritisation of the budget due to Covid-19 but she gave an assurance that the scheme is at the top of her priorities when looking at future budget allocations, NFU Cymru believe it vitally important that this funding is made available.
34. In the interim the Minister has announced that Welsh farmers can take advantage of free examination of skin scrape samples from sheep showing suspected clinical signs of sheep scab. The scheme is operated by the APHA and funded by the Welsh Government, running until 31<sup>st</sup> March 2021. The

initiative will aid accurate diagnosis, which is a prerequisite for appropriate treatment and successful control of sheep scab. The scheme will also encourage sheep farmers to work with their veterinary surgeon to protect their flocks from sheep scab.

### **Animal Welfare Issues**

35. Whilst we recognise that the committee's request was in relation to Animal Health matters we feel it appropriate and relevant to touch upon two animal welfare matters that are currently a high priority for Welsh farmers.

### **Livestock Worrying**

36. Wales is a small country with a high population density made even higher with the influx of visitors, this creates pressure on land use of which recreation is one of them. With walkers come dogs and sadly we are seeing increasing worrying of livestock particularly sheep by dogs. This creates severe welfare issues at times, and it is only a minority of dog owners that are transgressors.

37. There needs to be adequate measures in place that will allow Police Forces across Wales to have the necessary powers to deal with transgressors effectively. They rightly point out that current legislation that would allow them to do this is inadequate and needs urgent updating.

38. We would ask for the Committee's support to ensure that this can happen at Welsh Government level and that adequate resources are put in place to implement these changes.

### **Farm Animal transportation**

39. In December 2020 Welsh Government jointly with Defra consulted on Improvements to Farm Animal Transportation.

40. If the proposals in the consultation are implemented this will cause significant disruption to the Welsh and UK food supply chain and we do not believe, either, that the proposals will deliver gains to Animal Welfare.

41. Much of the focus on the eight-week *Improvements to Animal Welfare in Transport* probe has been around the Westminster Government's intention to ban live animal exports from England and Wales for slaughter and further fattening in Europe.

42. However, built into the consultation is a series of measures for more general animal transportation, including a ban on livestock journeys above 65km (40 miles) on days where external temperatures are forecast to be below 5°C or above 30°C.

43. In both cases, journeys could only be made in special air-conditioned or heated vehicles if the temperature is outside of the required range. No such vehicles are currently available.
44. This is a proposal that has been issued without any meaningful impact assessment. The cost implications and potential for food supply chain disruption are huge and no positive animal health benefits are quantified in the consultation.
45. While transit in hot conditions could be rescheduled to night in limited cases, cold weather could mean an effective ban on moving stock to market or abattoir for significant periods of time. This would cause significant disruption to the UK supply chain.
46. A hill ewe in Wales could legitimately be living in driving snow and 50mph winds but be banned from travelling when temperatures dip below 5°C. Other significant changes include in-transit headroom, which could see two-deck transporters reduced to one in order to meet the new measurements. This could mean that most transporters would not meet the standards, and this could result in double the number of road trips to move cattle and sheep around.
47. The consultation recommends cuts in livestock transport times and using local abattoirs to reduce journeys. This would create major problems for the broiler sector where a 4-hour limit is proposed, and this includes loading and unloading times effectively reducing the journey time to a maximum of 2 hours. This totally fails to recognise consolidation in the processing plants and there is absolutely no evidence that actual journey time compromises welfare.
48. We have written to our Minister to ask that this consultation be delayed until such time as Government come forward with a comprehensive impact assessment. To reiterate Welsh farmers wish to ensure high animal welfare on farm and during transport is of huge importance, it a priority for livestock keepers but proposals should only be taken forward on the basis of sound and proven science.

### **UK Trade Policy**

49. In concluding our short submission we all feel it appropriate to touch upon a key element of our lobbying activity throughout 2020, that being our work to ensure that our high production standards were not undermined by future UK Government trade policy.
50. Protection of our high standards of Animal Health and Welfare was a key element of this work and one of the key reasons why we wanted the UK Government to put into legislation measures to ensure that our high standards were not undermined by food being imported into the UK where those standards were not as rigorous. Over one million people signed the Union's petition in 2020 highlighting how important these standards are to the consumer. We were pleased that in November the UK Government agreed to extend the role of the Trade and Agriculture Commission and strengthened the group's remit through a new legislative underpinning, giving UK farmers a 'stronger voice in UK trade



policy'. It means the commission will produce a report on the impact on animal welfare and agriculture of each free trade deal the UK government signs after the end of the EU transition period on January 1<sup>st</sup> 2021. This report will be laid in Parliament before the start of the 21-day scrutiny period under the terms of the Constitutional Reform and Governance Act.

51. The strengthening of the Trade and Agriculture Commission's remit will mean that the group will be able to offer independent insight and expert guidance on future trading relationships with the rest of the world before any trade deals are rubberstamped. The group's reports will go before the UK Parliament and ensure MPs have the chance to properly scrutinise future trade deals going forward. This is an important amendment that we hope will help ensure that the Animal Health and Welfare standards that Welsh farmers are proud to adhere to are not undermined in future trade deals.