



Organic Centre Wales
Canolfan Organig Cymru

Response from the Welsh Agri-food Partnership Organic Strategy Group
prepared by Organic Centre Wales, Aberystwyth University, SY23 3AL
to the Welsh Assembly Government consultation on:

Consultation on Responsibility and Cost Sharing for Animal Health and Welfare in Wales

<http://new.wales.gov.uk/consultations/currentconsultation/envandcouncurrcons/310308responsibilityandcostshar/?lang=en>

General comment

In promoting cost sharing, it should be recognised that power and responsibility go together; in particular action on combating TB has been constrained by limitations of reliable testing and delays of cattle removal which are not within the power or control of farmers, so the cost sharing (i.e. responsibility) assigned to the farmers must be proportionate. We recognise that this process is at an early stage, and our responses are aimed to be helpful in exploring possibilities whilst urging caution at increasing costs and bureaucracy in very difficult times.

Q1 Can you provide information about which elements of the costs of animal health and welfare or disease prevention/control are incurred by industry?

Costs to organic farmers are largely in the form of additional and particular management and husbandry care, including quarantine measures and veterinary advice for animal health plans. There are also costs of vaccination and selection of stock for disease-free accreditation.

One major identifiable cost is the labour required for TB testing: in many cases additional labour has to be employed. Although there is livestock cost compensation for TB reactors, the knock-on costs and disturbance to their businesses, such as being unable to sell stores ready to go and then bearing the costs of their associated keep, including additional management costs and (perhaps) their consumption of the year's silage are a huge burden. These costs are increased for organic farmers that have to pay premium prices for purchased organic feeds, which may also be very difficult to procure.

Other costs include pre-movement bTB testing, animal disposal, and movement recording.

Q2 Do you have any views on where efficiency savings could be made or the regulatory burden be reduced?

We would regard efficiency savings as not just cost reduction but benefit from effort expended.

The key points for organic systems is that those that have to undertake preventative health planning for certification or quality assurance pose less of a risk and therefore should share less of the costs, and that preventative health planning can increase efficiencies within the system and subsequently efficiencies and cost saving across the livestock sector.

In general, the greatest efficiency would be achieved by reliable testing, which appears to be some way off. With the current proposals for testing, improved mobile crushes and handling equipment could be made available to veterinary practices to support the testing effort, as smaller

farms or farms with stock in remote fields can otherwise require disproportionate time investment both for farm and veterinary practice.

Q3 Do you agree that good farming practice should be recognised and rewarded under any system of responsibility and cost sharing and how might this be best achieved?

Recognised quality assurance schemes – such as organic schemes under EC 2092/91 and others that are UKAS accredited and with requirements for health plans and biosecurity issues, should have a different cost/penalty structure.

Cost sharing through levy payments would have the benefit of using an established system, although it may be complex to have risk-based fees through this method. One route would be to charge a standard rate unless an Animal Health Plan certificate is submitted. High AHP scores would reduce the levy – this would require AH Plans to be scored for health promotion and biosecurity by veterinary practices. This would require a ‘model’ approach of good farm practice to be created and a grid to enable the veterinary practice to score the farm’s plan and animal health records against the model. The fee/levy could then be varied in line with the score. The report should identify short-falls, and in the subsequent years the score would be further reduced if actions to remedy the short falls have not been taken. This would need some considerable development, but would serve to encourage the use of Animal Health Plans, and the engagement of veterinary practices in the promotion of good health on farms.

The problem with scoring the plan itself is clearly that just because farmers have a plan doesn’t mean it is implemented effectively. The alternative would be yet more complex and expensive but could focus on scoring health and welfare outcomes of planning and health management. This would require the use of farm based animal welfare assessment or collection of animal health data centrally and benchmark individual farms against it and score them on that basis. It would be important that an ‘opt out’ would be possible on payment of a maximum levy/fee.

Q4 Do you agree that poor farming practice should be recognised and penalised under any system of responsibility and cost sharing and how might this be best achieved?

In principle, those not taking responsibility and preventative action should incur higher proportion of the costs, or receive higher penalties. The difficulty is always making the judgement. Livestock trading is a high risk activity so those with multiple movements, monitored through the BCMS, could score high on a risk assessment exercise, leading to variable rates of levy charged at slaughter. Other high risk issues would be high stocking rates, poor fencing and those with multiple, separate land holdings with a high proportion of boundary.

Since major disease risk is associated with livestock movements, a possible system would be to make a charge for each and every movement off or to the Livestock Management Unit. This would incur no extra bureaucracy for the farmer as the BCMS could be adapted to make a fee charge for each transaction. This would mean that farmers with animals that were moved frequently would end up paying more, reflecting the risks associated with frequent movements. It would however, require that farmers have complete confidence in the BCMS system, and could verify their records and appeal errors, and that a similar system be operated for sheep movements.

One aspect worth considering is that fees deducted from receipts (such as levies at slaughter) may not have such an impact on the farmer as a separate requirement for payment, although the latter would clearly require more administration. Since behaviour change is required, impact on the farmer is necessary.

Q5 Do you agree that we should explore developing responsibility and cost sharing for exotic disease on a GB basis and are there any other instances where a GB approach would be essential?

Yes it should be on a GB basis, but it is more difficult to argue that farmers should bear the costs for exotic diseases over which they may have little control, as we have such a leaky biosecurity system with regard to imports of livestock and foods.

There also needs to be a GB approach to monitoring of animal movements and scab.

Q6 Do you agree that each part of GB should make its own arrangements for responsibility and cost sharing on endemic diseases unless action on a particular disease is best handled at GB level?

Yes. But there also needs to be GB agreement on how to deal with farms straddling borders.

Q7 Do you agree that the priority for the Welsh Assembly Government should be to maintain the funding for eradicating bTB rather than diverting funds from eradicating bTB to make good any of the proposed reductions in the GB budget to tackle TSEs?

Yes. bTB probably needs a concerted focus for at least 10 years, although the TSE and other animal disease situations should be monitored to prepare for a change of emphasis if needed. It is a concern that budget limitations prevent a broad monitoring of animal diseases; the concerted recent effort on TSEs may have caused the lack of attention to TB.

It is vital that the industry acknowledges that current control measures are not working and that something significantly different needs to be done. There should be a focus on management practices that can reduce the somewhat disproportionate emphasis on badgers as the sole villains.

Q8 Do you agree that it is not appropriate to establish a non-governmental organisation “quango” at GB level to achieve the aims of responsibility sharing? What form of arrangements would you favour?

It is not clear what the difference between a ‘formalised’... ‘core group of individuals from across the farming industry’ and a ‘quango’ is. There is a clear benefit from having a group of engaged GB industry representatives working together on exotic diseases, although see comments on cost-sharing above in Q5. We are not sure a GB basis is best for the responsibility sharing of endemic diseases. For these situations local stakeholder engagement and knowledge is important.

Whatever system is put in place needs to ensure that the organic sector, in particular the certification bodies as the front line in organic farm inspection and checkers of animal health plans, is involved.