

Welsh Assembly Government consultation on:

**Positive Animal Health: a Draft Action Plan for a Partnership
Approach in Wales and England.**

Response on behalf of:

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A definition of positive animal health is not presented in the draft action plan and reference to positive animal welfare should also be included in the plan. It is necessary to define such these concept to identify the boundaries of what the action plan is trying to achieve. For instance the ideas presented in the draft action plan on positive health differ quite considerably from the definition of positive animal health used commonly in organic livestock systems. In organic farming, positive animal health is defined as implementing management actions to maintain good health and welfare (note the inclusion of welfare) before the balance tips towards ill health, disease, stress or abnormal behaviours. There are three main areas of focus to achieve this state of positive animal health and welfare in organic livestock systems; appropriate feeding, appropriate breeding goals and species-specific husbandry, that should refer specifically to housing and the impact this can have on animal welfare and behaviour. The emphasis in the draft action plan appears to be on disease prevention and control (bio-security) rather than improving animal health and welfare. Animal welfare should be a priority in promoting disease prevention and control in livestock systems and this is not mentioned at all in the draft action plan. Poor animal welfare and poor living conditions will result in high stress levels in animals and subsequently reduce their resistance to infection. Considering the above deficiencies in the draft document, it appears to be more a draft action plan for livestock bio-security than a draft action plan for positive livestock health.

Animal health plans are an essential part of livestock production systems and are all ready a compulsory part of the certification process in organic livestock farming in the UK. Compared with animal health plans used in organic livestock systems, the proposals outlined in the draft action plan appear rather unambitious. They are concerned with disease prevention and control (bio-security), not with improving animal health and welfare (the spin-off from which can be disease prevention and control). Ambitious but achievable targets need to be set for animal health and welfare in the UK in order to regain the good health and welfare reputation the UK had before the incidence of problems such as BSE and FMD. As well as improving the general health and well being of farmed livestock in the UK, animal health plans can also be valuable management tools for improving efficiency on the farm due to the requirement for structured data collection and health monitoring.

Health plans should be evolutionary documents. They should describe the current situation, identify health and welfare targets for a set time frame and then allow for reassessment of the plan after a period of time (preferably annually as a minimum). Due to their quite specific nature, health plans need to be developed on a farm-by-farm basis. There is obviously a requirement to have national minimum standards of health and welfare but farmers need to be encouraged to exceed these minimums, not only for the benefit of their animals but also for the potential economic benefits that could be achieved through reduced animal health costs or differentiating their products through animal health and welfare quality assurance programs (e.g. Freedom Foods). Illustrating that farmers could reduce their animal health costs and improve productivity if their animals have high health and welfare status, may be another way of encouraging farmers to farm beyond minimum standards of health and welfare. Benchmarking of health status, disease incidence, welfare standards and animal health costs on UK farms may be a very useful way of defining the industry status and encouraging poorer performing farmers to strive for better performance.

Farmers need assistance from their veterinary professional to develop a health plans, but farmer training days and handbooks on best practice will be essential tools as well. There is also a need to shift the role of vets away from prescribing drugs for existing health problems on farms (a margin is often placed on the sale of veterinary medicines to supplement income) towards a more consultative/advisory role to prevent health problems occurring. In order to make animal health plans simple,

nationally transferable and consistent for farm operators and veterinary professionals, it may be useful to develop a pro-forma for use when developing the health plan. A pro-forma has all ready been developed by The Organic Advisory Service for organic livestock systems and this may prove useful in developing a similar tool for conventional livestock health plans. The Organic Advisory Service pro-forma includes such things as stocking policy, breeding and feeding policies, disease recording and monitoring systems, routine veterinary/management practices related to health and welfare (e.g. tail docking), assessment of current health status on farm, herd/flock bio-security/quarantine procedures on the farm, parasite control, vaccination policy, problem diseases (and incidence) on farm or region, and finally routine medicinal inputs (the reduction of which, where possible, will reduce livestock costs). Farm animal welfare status, as well as health, also needs to be monitored and improved upon. The Organic Advisory Service pro-forma does include some aspects of welfare, and in addition DEFRA are currently funding work at the University of Bristol Veterinary School looking at developing a system for measuring and monitoring animal behaviour and welfare on organic farms. This work should be very transferable to the conventional farming sector.

It was mentioned in the document Animal Health and Welfare Strategy for Great Britain – A Partial Regulatory Impact Assessment, that those farmers most likely to take up health planning as a regular part of their farm management are those all ready in quality assurance programs. If the general public are educated in how food is produced (an aim of the health and welfare strategy) and made aware that systems are put in place to ensure food safety and high animal welfare, then those farmers in quality assurance programs may be able to attract a consistent premium for their products. This may mean that farmers not involved in such schemes fall behind and this could encourage them to develop animal health plans and join quality assurance programs to ensure they retain markets for their produce.

The introduction of any health and welfare action plan in Wales should not put farmers at a competitive disadvantage to countries in the same market place without such a plan. To that end, voluntary agreement by farmers to implement health planning on their farm would be most desirable. However, in order to achieve good

uptake of health planning, the benefits to farmers and livestock industries in general need to be quantified. Significant research will be needed to achieve this.