



Consultation Response

FROM THE RSPCA IN WALES

Consultation on the Introduction of Quarantine Units February 2016

QUESTION 1: TO WHAT EXTENT DO YOU AGREE WITH THE BENEFIT OF IMPLEMENTING QUARANTINE UNITS (QU) TO REPLACE THE CURRENT 6-DAY STANDSTILL RULE (6DSS) EXEMPTIONS?

n/a

QUESTION 2: THE PROPOSED CHANGES – WHAT ARE YOUR THOUGHTS RELATING TO THE PROPOSED QU PROCESS?

RSPCA Cymru's views are consistent with current veterinary opinion as stated on page 6 of the consultation document, in that we believe that the standstill rules should be retained in order to mitigate the risk of the spread of animal diseases. However, we also acknowledge that the rules could be simplified in order to provide a balance between disease control measures and flexibility of movements for trade, without compromising the health and welfare of the animals.

Any benefits resulting from a change in the system will only materialise if the adopted system is adhered to in terms of maintaining strict biosecurity measures. It is of some concern that in the Wales Animal Health and Welfare Framework Implementation Plan Mid Year Review 2015-16, there seems to be a lot of emphasis on promoting on-farm biosecurity awareness, which in itself is a very good thing. However, this message has been promoted for a significant number of years, and the question needs to be asked for how much longer do we need to promote the biosecurity message? How much longer will it be before we can be relatively certain that actual levels of biosecurity are fit for purpose? Is the review acknowledging that by having to keep repeating the importance of biosecurity in terms of controlling/preventing disease, that present on-farm biosecurity practices are not as good as they could be? If this is the case, then is proposing to change the 6DSS rule at the present time a little incongruous?

The consultation document states that a QU could help to maintain or improve the overall status of the health and welfare of the main herd, but neglects to mention the word flock (presumably this is a typographical error).

It should also be clarified that the incubation period of some diseases can be longer than six days, for example, foot and mouth disease, and so the main way of controlling disease using a 6DSS of any kind would appear to be through the slowing down of animal movements rather than the identification of clinical signs of disease.

Given that there will be costs involved in creating one or more QUs on farms, it will be interesting to see how many farmers opt for this rather than sticking to the present whole farm 6DSS.

QUESTION 3: THE NATURE AND NUMBER OF QUs PER FARM PREMISES – YOUR VIEWS ARE BEING SOUGHT AS TO WHICH OPTION SHOULD BE CONSIDERED FURTHER AND WHETHER THERE ARE ANY OTHER PROS AND CONS THAT HAVE NOT BEEN CONSIDERED

It would seem logical that in order to have the most flexibility for trading, having two QUs with their own County Parish Holding (CPH) number which could be used at the same time would be the most flexible and be of most benefit, particularly in those heavily livestock populated geographical areas. As mentioned above, the flexibility of the system needs to be tempered by an awareness and confidence that such a system will actually work in practice, and therefore the integrity and robustness of the system for appointing QUs will be key to their success, as will the system of inspection, which at present, is due to happen at 18 monthly intervals. Is this designed to coincide with Certification Body visits? Should this not be an annual inspection?

As has been noted in the consultation document, having two QUs as mentioned above, will also be the most complicated for the farmer and possibly the most costly.

QUESTION 4: CHANGES TO THE DISEASE CONTROL (WALES) ORDER 2003 – YOUR VIEWS ARE BEING SOUGHT AS TO WHETHER YOU AGREE OR OTHERWISE WITH THE PROPOSED CHANGES

The changes seem in line with the changes that are necessary to account for the advent of QUs. However we would ask what happens to those who opt not to go with the idea of having a QU on their farm? Will they have to adhere to the original legislation that was in place before the idea of the QU was developed? Maybe we misunderstand the potential scenario that may arise, but clarification with regard to the legislation would be appreciated.