



ICMSA

Submission to the

Department of Agriculture,

Food and the Marine on the

Strategic Review of

DAFM Laboratory

Service

March 2017

Introduction

ICMSA has always believed that the Regional Laboratory network plays a hugely important role for farmers around the country and maintenance of the regional veterinary laboratories structure and provision of these resources for vital diagnostic and advice services for farmers are essential into the future. Agriculture plays a crucial role within the Irish economy and the ability to stay competitive in the midst of global uncertainty will be important over the next decade. Key to this competitiveness is the role of animal health within the animal population. Never before has there been such a focus on quality production of food and food products and within Ireland animal health status is now at the forefront of marketing ability of those products. In this context, ICMSA believe that all arms of the state should be working efficiently and practically in the coming years to achieve the future growth path of Irish agriculture. Within this submission ICMSA focus on general issues within the “Strategic Review of DAFM’s Laboratory Service” before focusing on specific issues within the document.

General Observations

ICMSA are aware that one of the proposals, indeed one of the central proposals is rationalisation or centralisation of the regional veterinary labs. However, while this is a central and core issue, other aspects of the report warrants attention. These other issues are to some extent interrelated with the future development of the regional veterinary labs and the facility and service they can provide.

While recognising the complexity of implementing the proposed changes set out in the strategy document, if such are accepted by the Department management, it would seem that a ten-year horizon is quite a long period. Of course, depending on the level of changes finally adopted this period may be, or indeed could be, considerably reduced. If there are arguments in favour of substantial changes clearly these should be brought about as soon as possible, consistent with a continuation of the service.

The strategy report contains 17 major recommendations. Clearly there is merit in all of these recommendations. However, while recommendation 2 states that DAFM should articulate a vision for its laboratories, one would have thought that the working group itself would have been more forthcoming on this point particularly regarding the nature and extent of the services envisaged or required.

There seemed to be a preoccupation with what are essentially management issues and staffing. For example, recommendation number 14 is most definitely to be welcomed regarding surveillance and horizon scanning, however the report is very superficial on this point although references are made to big science and big data. The capture of even the existing data from slaughter facilities, while substantially improved in recent times, is only at the early stages.

Everybody agrees that what is referred to as big science and big data is required to build a world-class laboratory service for a world-class food producing sector. ICMSA are strongly of the view that this matter needs to be substantially explored and to a much greater extent than what is contained in the strategy document. Indeed, as we shall outline later it has implications for the number and location of regional veterinary labs. Of course, surveillance is not confined to animals but extends right across the agricultural and food sector including plant health and plant diseases.

Specific issues

Page 8

In the second paragraph, it is stated that “It is envisaged that a certain section of consumers will always demand products of the very highest health and safety standard.” ICMSA feel that all customers demand the very highest health and safety standards.

Page 15.

Clearly with a mismatch of structure and independent development of various divisions and laboratories due to historic reasons, it is recognised that there is an overlap and

duplication of effort and staff. The report fails to identify the extent of potential savings that could be brought about.

No doubt there are substantial areas for efficiency and redeployment of resources. However, the report at a later stage lays claim to additional staff and resources. Clearly this area needs to be examined in greater detail before any final decision is made by the Department itself.

Page 18.

ICMSA fully agree that the testing and scientific standards must be to the highest international standard and that Ireland should endeavour to be early adopters of new technology so as to hold our position as producers of top quality food.

Here again there may be a mismatch in the type of staff deployed bearing in mind that the current number of staff employed is 306 amounting to 10 percent of the total staff complement of the Department. It is recognised that the real strength of the laboratory services will rest not just on the physical infrastructure but indeed the professional and support staff.

Rationalisation and automation of routine work should release substantial resources for redeployment.

Page 27

The report very helpfully set out the three principal roles of the regional veterinary labs (RVL) as follows

- The provision of a veterinary laboratory diagnostic service to the farming community through their veterinary practitioners;
- The collection and publication of passive/scanning surveillance data – to monitor trends in the occurrence of endemic disease, provide for early detection of new/emerging or exotic diseases and substantiate claims of freedom from specific diseases and the overall animal health/welfare status of the national herd;
- Disease investigative function to safeguard the food chain.

ICMSA fully agree with these but it is hard to reconcile these three stated principal roles with recommendations that there should be at the very least a reduction in the number or indeed centralisation into laboratory at Backweaton Campus. This is a core belief of ICMSA, the ability to perform these three functions must not be diminished and however, ICMSA believe that they can be achieved by retaining a more efficient RVL network.

Furthermore, on page 27 the working group's report states that

“The RVLs are DAFM's main reservoir of expertise in veterinary laboratory diagnostic investigation with significant capability in diagnostic veterinary pathology, and other relevant specialist laboratory disciplines. The clinical expertise and differential diagnosis capabilities of the network are unique assets within DAFM for the characterisation of endemic, emerging or exotic diseases. Maintaining and usefully exercising this body of expertise, allows DAFM to rapidly deploy a well-connected, trusted and trained investigatory asset in the event of suspected or actual incursion of exotic disease.”

Again, we would fully concur with this objective and realistic assessment of the role of RVL's. This is probably the best possible argument that one can advance for the retention of the existing arrangements, or some modified version of same, rather than a reduction to three RVL's or centralised at the Backweston campus.

On page 31 and 32 reference is made to new and emerging hazards and the vital need for Ireland to be equipped to anticipate and deal with these emerging threats if not realities. This been the case is a further argument that the timescale envisaged for the implementation of the strategy is far too long - extending over a ten-year period. However, given the impending Brexit, an all island disease strategy must also be outlined in the coming years.

Page 39 contains references to charging for the intake of carcasses and samples at RVL's which

“that are not of suitable quality or not of surveillance priority, but nonetheless processed, should be subject to full (or increased) recovery of the costs of PME, testing and reporting.”

ICMSA believe strongly must not be based on cost recovery as the work of the RVL is based on submitted carcasses and samples provide an essential national service of the early detection and general surveillance which has a common good dimension. This proposal will require detailed discussions and negotiations with the Department including a protocol regarding submission of carcasses and samples which always is or nominally, through the farmer’s own private veterinary practitioner.

Page 40

ICMSA fully agree with the recommendation relating to communication, or more precisely the lack of, and we would agree with the recommendation set out on page 40 and 41.

Page 52 and subsequent pages

This is the commencement of a detailed discussion regarding the future role and configuration of the RVLs’. On page 52 it is stated that “The RVL network is the basis for the surveillance and investigative capability of DAFM. This role is valued by both the farming community and PVPs and in ICMSA’s view is the most critical part of this review.

On page 56 it is stated that “Consideration should be given to re-branding RVL’s to reflect their primary role as animal disease investigation and surveillance centres. This unique role of RVL’s is the provision of PME and follow-up field investigation”. ICMSA fully concur with the statement. However, this statement is a strong argument against the recommendation that the number of RVLs should be reduced to two- (excluding the RVL at Backweston.).

The SWOT analysis in appendix 5 is, at best very rudimentary, but more likely self-serving in order to support option two. Indeed, such is the low level of the standard of the swot analysis that it should be dismissed as irrelevant.

On page 58 references are made to the central carcass collection system which operates in the Netherlands and Belgium. This is a rather useless comparison and not a very useful comparison to support a reduced number of RVLs. Each of the two countries referred to are of the size of Munster and each country has an excellent network of roads.

On page 66 references are made to a pilot carcass collection system. ICMSA see merit in this and would like to see a cost benefit analysis carried out on this point, not just from the North East but from all of the country. It is likely that the cost involved would be quite high and may indeed, on this basis alone, lead to a conclusion that the so-called option two, the three RVL configurations, or a centralised approach, is not the way to proceed.

Page 76

We fully agree with the sentiments expressed in the paragraph dealing surveillance. In particular, we welcome the telephone helpline proposal as set out in on page 82.

Conclusions

Having read and considered the document as a whole and particularly the analysis and the arguments advanced regarding RVL's, ICMSA are not at all convinced that the apparently preferred option two of the working group (i.e. three RVLs at Athlone and Cork and Backweston) is the best option. All other issues aside, the geographic location of the three RVL's means that there is no RVL North of the Galway Dublin line. But the issue is much more complex.

ICMSA believe a compromise between the current arrangement and the preferred option of the working group of three RVL's should be considered.

The elements of this compromise are as follows: -

Backweston would be the centre of excellence in regard to surveillance. The proposed new RVL to be located in Moorpark or Fermoy and specialising as proposed in dairy cow health and disease.

The current RVL's at Athlone, Sligo, Kilkenny and Limerick, to be retained which are much more focused and reduced remit, as stated on page 56, of animal disease investigation and surveillance centres. ICMSA believe that this proposal should be fully considered and costed. The advantages of retaining a nationwide network of RVLs with two centres of world-class excellence at Backweston and in Cork, is the best way to proceed, having regard to various conflicting requirements.

This approach would not require additional staff to be deployed in Sligo and possibly Limerick and the level of capital expenditure required would be substantially less than that suggested by the working group in the strategy document. The role of the RVL's at Athlone, Sligo, Kilkenny and Limerick, would have a sharper focus than at present and would be reliant on the proposed new centre in Cork and or at Backweston for more complex work.

While obviously, we have no actual evidence of the costs involved but it is likely that our proposal could be delivered at a lower or equal cost to that proposed by the working group which would require a centralised carcass and sample collection system. This needs to be examined in greater detail.

But of course, there are more important issues than monetary cost alone, non-monetary costs that are not achieved directly must also be computed. The maintenance of a national network of RVL's both of the point view of effective disease surveillance and as a need to on-farm and rapid diagnosis of disease must also be of central consideration which in our view has not been adequately addressed in the strategy document.