



**ICMSA**

**Submission**

**to the Department of  
Agriculture, Food and the  
Marine on the  
National Farmed  
Animal Health Strategy**

**October 2016**

## **Introduction**

ICMSA has been asked to give our views on the consultative document prepared by the Department of Agriculture Food and the Marine entitled National Farm Animal Health Strategy, with a subtitle stated as “A framework for collective action by stakeholders”.

Indeed, the subtitle to the document encapsulates the general thrust of the document which seeks to build a strategy based on collective buy-in on action by all stakeholders. While this undoubtedly has a distinct advantage, and is in some ways an elaboration of the existing cooperation which existed in the establishment and working of Animal Health Ireland, the Department of Agriculture must not abdicate their responsibility in Animal Health and funding for same.

Before dealing with general and specific issues in the consultative document, which will be addressed below, ICMSA think it is appropriate to list three issues which form the back drop to the strategy document but also are key pillars to the animal health strategy and policy currently and in the future.

The three issues are, **Antimicrobial Resistance (AMR)** and the likely impact on animal husbandry practices, **Cost Sharing and Risk Sharing of the Cost of Animal Disease, Animal Health, Disease Control Monitoring and Compliance**, the extent of them all and the **responsibility of the Department of Agriculture and Public Funded Bodies**.

Further to these three key areas is the onset of Northern Ireland exiting the EU and the distinct animal health issues that will arise from same. There must be continued monitoring of this changing scenario in the coming years.

## **Specific issues covered in the draft document-National Farmed Animal Health Strategy**

The draft strategy document is by and large a considered document covering the main issues. Clearly the policy and resources that will be put in place to achieve the quite ambitious plans will be the critical deciding issue. The emphasis placed on animal health and that prevention is better than cure is clearly the correct approach. Furthermore, animal health is seen as one of the four pillars or determinants of output levels as set out on page 5 of the document.

The switch in emphasis from managing disease in individual herds vis-a-vis animal health management is repeated on page 8. While this is self-evident it is nonetheless important that it be stated. In addition, we would concur with the last paragraph on page 6 regarding the risky nature of agricultural production.

On page 9, second paragraph, reference is made to the launch of Animal Health Ireland. However, please see our comments below regarding the funding and other issues relating to Animal Health Ireland.

On page 9 and 10 under the heading “**One Health**” the critical issue of AMR is discussed.

AMR and its consequences and the changes that must be made in the availability and use of antibiotics are being actively considered in Ireland, at EU level and at WHO. We are fully aware that a significant number of milk purchasers have greatly extended and developed their sensitivity testing and advise farmers on the most appropriate antibiotic that should be used in recent times since the current regulatory regime was put in place in Ireland.

In addition, it is likely that purchasers of Irish milk, milk products and meat will become increasingly demanding on this front we are not just the availability of antibiotics will be of concern but the actual level of usage both generally and at individual farm level. The experience of the Danish pork and pigmeat sector may serve as a good template of what can be done on the costs and benefits associated with same.

On pages 12 and 13, the document sets out the essence of the strategy framework and the four key elements which the strategy will cover. We note in particular the last of these four

key elements namely the assigning of responsibility and holding stakeholders to account for delivery as an important aspect.

However, there is a tendency for the document as a whole to exonerate the Department of Agriculture for any responsibility, or at least not to allocate specific responsibility to the Department. When the issue of carrying out a function is addressed which involves the Department, the commentary seems to be confined to setting out the need for additional resources for training etc. This approach by the drafters of the document is in sharp contrast to the expressed allocation of responsibility to other stakeholders and particularly in the case of farmers. A more balanced approach is required and particularly in the context of a shared and stakeholder buy-in strategy.

At the bottom of page 15, reference is made to animal feed and the risk associated with same from a human and animal health perspective. It is not clear what is envisaged in the new strategy over of the regulatory system that is currently in place. Is it envisaged that the compound feed sector will be required to make a contribution to the new animal health levy funding arrangement?

At the bottom of page 16, the statement that animal health standards are ensured through consistent cost effective control and enforcement strategies is to be welcomed, particularly the emphasis placed on cost effectiveness which presumably incorporates cost efficiency.

On page 18 in the paragraph headed “Improve Capacity to Protect Public Health”, ICMSA again find that the responsibility seems to be confined to livestock farmers. We would have expected that reference should be made with regard to the role and responsibility of veterinarians both in public service and private practitioners and policymakers regulators and the other commercial actors in the food production chain.

On page 22, reference is made to the lack of a central reference document with regard to the various health initiatives. This is a major shortcoming from the Department’s perspective and this should be put in place as a matter of some priority and does not require a formal strategy setting process for this to be delivered.

With regard to the proposed establishment of a ‘Farmed Animal Health Strategy Review Body’ as set out in page 22 and page 70, the term review body may not be exactly appropriate. We would prefer monitoring instead. Furthermore, it is essential that the chair

of such body is an independent, competent person and that the terms of reference of such a body would be up for consultation before implementation. There should be direct farmer representation including ICMSA on this body as a matter of priority.

In the second last indent on page 22 reference is made to review the commitment of all stakeholders to Animal Health Ireland to ensure a sustainable business model in the medium-term.

This is a very important issue given not just the increasing role that Animal Health Ireland will play in the future given its current responsibilities, but its role could be expanded as a direct result of the implementation of the strategy under review. It is essential that the funding of Animal Health Ireland is put on a sound footing so that medium and long-term planning can be undertaken with the degree of certainty which is required for such plans and execution of same.

The first indent under the heading relevant considerations on page 24, reference is made that the right to own animals must take account of the rights of other farmers is an important statement and one that has been consistently supported by ICMSA.

In the third indent on page 24, the reference to the many stakeholders extracting value while at the same time introducing additional animal disease risk is an important but self-evident statement which must form the basis of the likely shared cost regime to be put in place. The public good consideration is key to an animal health strategy and while “free riding” by private individuals is always a concern, the social benefit must be weighed against the social cost.

In recent times there is a definite programme been followed by the Department to reduce its involvement in animal health and disease and to farm it out to other bodies in particular to Animal Health Ireland. ICMSA is very concerned in relation to this approach, Firstly, the required levels of control may not be adequate and secondly it offers a convenient means by which the Department reduces its obligation in relation to funding and costs. Given the crucial importance of animal health and disease control to the economy, it is the ICMSA view that too much emphasis is placed on Animal Health Ireland notwithstanding the excellent work and dedication of the small professional staff engaged by Animal Health Ireland. If this process of ever-increasing transfer of responsibility from the Department to

Animal Health Ireland is to continue, despite whatever reservations are justified, the level of funding that is to be provided by the Department of Agriculture must bear some of equivalents to the costs that would fall on the Department if it carried out or continued to carry out the activity that are now being placed upon Animal Health Ireland.

On page 27, the fourth indent, reference is made to cost and losses arising from disease. While one could accept that the cost of putting in place measures to reduce the risk of animal disease at farm level should be borne by the individual farmer, it is a totally different scale to propose that “losses resulting from failure to implement such measures should lie fully with the farmer.” ICMSA do not accept this.

On page 28, under the heading “Recommended Strategic Action 2016- 2021” in the third indent reference is made to the need to review the funding mechanism for AHI to ensure a sustainable model in the medium-term. This is long overdue.

In the third indent on the same page it is indicated that the relevant section of the Animal Health and Welfare Act of 2013 will be brought into force. This will require very detailed consideration to ensure first of all that a cost efficient, effective system and equitable proportional sharing of the cost is achieved. With regard to cost benefit analysis, we welcome the statement to this effect contained in the last indent on page 28.

The Animal Health and Welfare Act 2013 brought about significant changes in the principal legislation governing the making of regulations for the setting and collection of levies relating to animal health and disease.

Part five of the Act entitled “Animal Health Levies” contains four sections. This part of the Act is largely based on the Bovine Diseases Levies Acts 1979 and 1996. The levy can be charged upon milk received for processing or animals slaughtered or exported. However, there is provision to allow the charging of animal health levies on a wider range of species and diseases than currently where levies are only paid in relation to cattle and are for control of TB and Brucellosis. The amount of levy is to be specified in regulations approved by the Oireachtas before they are made.

The consultative strategy document makes specific reference to this provision and wider issues. The Department of Agriculture is likely in the near future to proceed to make regulations under this section of the Animal Health and Welfare Act 2013 to replace in total or part the current animal disease levies regime. This is a major issue that would require very detailed consideration.

Cost sharing in itself is a contentious issue and agreement is not readily achieved. Indeed, the difficulty of Animal Health Ireland to reach agreement on what is minor scale of cost sharing in relation to the pilot Johnes disease scheme demonstrates the difficulty involved. However, moving from the current regime of specific animal disease levies to a regime involving wider matters and multiple contributors is a completely different scale of complexity.

What is the scale of the cost headings to be covered, what is the actual cost, how it is to be shared are key issues? However, it is not the full extent of the consideration that should be examined. Will there be a change regarding who carries the risk or part of the risk and the cost should the risk materialise.

Finally, before any changes are made it would be essential that an objective of independent assessment would be made of the cost not just the current cost but the cost that should be achieved by the most efficient model way of carrying out the activities required. The next crucial issue is -what part of the overall cost shall be met by the Exchequer under the heading of public good.

We would agree that anybody involved in food production and processing should contribute to the cost of implementing monitoring and controlling in an appropriate manner and this should include not just livestock marts but meat processors for example.

With regard to the statement contained in the first indent on page 29, we would fully support such comment but would add that in addition to scientific evidence, there should be economic evidence.

The document places emphasis on professional expertise which to date have not featured strongly within animal health and disease eradication schemes in Ireland – such as statisticians and economists. The emphasis now being placed on the role that these professions can play is to be welcomed. Unfortunately, the level of expertise in the relevant health economics in Ireland is quite poor to non-existent. However, the

considerable expertise available in other Member States particularly the UK and in the Netherlands can be readily accessed and used.

With the caveats already stated in this document we would broadly agree with the eight strategic actions listed on page 31 and 32.

On page 42, first indent, the reference to data sharing arrangements and data analytical capability is to be welcomed. However, it would be a mistake to think that this is a readily achievable outcome given the various databases. It is internationally accepted that the use of administrative records and similar type data captured by different public bodies requires detailed and specific coordination for the full potential to be harnessed. Thus, resources should be made available and deployed to build a database structure covering all aspects of animal health and animal disease in the country.

On page 45, references are made to statistical modelling to assist decision-making in the context of disease control and eradication. Clearly this could be carried out by an expanded role for CVERA.

On page 47, under the heading “Relevant considerations” is stated that Ireland does not have an abundant supply of economists with specialist experience in animal and health economics. Given what we have already stated on this issue - the use of the word “abundant” is a gross exaggeration.

On page 55, reference is made to the establishment of an Animal Feeds Stakeholders Network. There is merit in this.

On page 56 and 57, detailed consideration is given to ICT development and data management. We would see this as a critical issue to be addressed as part of the strategy if it is to be successful.

The last two indent of page 68 makes reference to DAFM investigation division and the outcome of court cases in which the Department were involved. Having regard to the much quoted adage that justice must be done and seen to be done - this is a welcomed development and is necessary to win the full support of the farmers and others involved directly in animal health, disease control and eradication.