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Summary of responses to the consultation on a new independent body for animal health: a modern governance and funding structure for tackling animal diseases, 30th March to 30th June 2009

September 2009

Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR
Telephone 020 7238 6000
Website: www.defra.gov.uk

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Defra
Responsibility and Cost Sharing Programme
Area 5E Millbank
17 Smith Square
London SW1P 3JR
Tel: 020 7238 4953

Email: RCSharing@defra.gsi.gov.uk

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<http://www.defra.gov.uk/corporate/consult/new-independent-body-ah/index.htm>

Published by the Department for Environment, Food and Rural Affairs

1. Introduction

- The consultation exercise was the third in a series on Responsibility and Cost Sharing for Animal Health, dating back to December 2006. During that period, the Department also worked extensively with its customers and stakeholders to develop robust and practical proposals for how animal keepers could share both responsibility for and the cost of, decisions relating to animal health in England. The work led to the publication of consultation on a new independent body for animal health “*a modern governance and funding structure for tackling animal diseases*” in March 2009, in which we made a number of specific proposals.
- The consultation document requested views on how a new independent body for animal health should be constituted and managed, how the interests of animal welfare could be protected, how the delivery arrangements could be maintained and simplified, how funding could be split between Government and industry, co-funding rates, the use of private insurance, the operation of a levy, and how to establish partnership working ahead of legislative changes.

2. Summary of responses

- We received 178 written responses to the consultation.
- A list of those organisations and individuals who responded is available at Annex A.
- The consultation document asked a number of specific questions, and in addition, respondents raised a number of other concerns and ideas. This document summarises responses to both the questions, and other comments. It is not an exhaustive list of all comments received.

Q1. Views are invited on the assumptions and estimates in the Impact Assessment

Many respondents criticised the Impact Assessment (IA) and the assumptions and conclusions made in it and considered that it did not provide a sufficiently robust case for sharing costs. It was suggested that the Impact Assessment was written to justify the proposals and not to demonstrate how and why the proposals would achieve greater efficiencies and cost savings.

Several respondents across a range of sectors considered there was a lack of factual information or evidence and the lack of a breakdown of costs in the IA as well as several key species being omitted from the assessment, for example horses, zoo animals and game. Several considered there were a number of inaccuracies in the IA, for example contradictions in the number of animals of a particular type quoted.

The IA was also criticised because of the lack of rural proofing and the lack of recognition of costs borne by livestock keepers.

Q2. Comments are invited on the proposals for a new body, including its scope, governance and working arrangements.

Many varying suggestions were made on the scope, governance and working arrangements of the new body. Several respondents questioned the proposal that the body would be staffed by existing Defra personnel and would remain in London. Many felt that the Body should be located outside London, and staffed by non-civil servants, which they considered would be cheaper.

Some respondents questioned whether the proposals would lead to increased bureaucracy, duplication of effort and complicate policy formation whilst incurring unnecessary costs.

There was little support for the proposal to separate animal health and animal welfare. Some felt that retaining responsibility for some policies within Defra, whilst transferring others to the new body would cause unnecessary confusion and add to unwanted bureaucracy.

Some commented that the new body should only be created if it could be a true partnership of industry and Government, independent of Ministerial control, and if the body had real decision making power. However, as the new body would be part of Government some commented that it could never be truly independent.

On the composition of the Board of the new body there was a difference in views between respondents concerned with the livestock industry and those outside it regarding the inclusion of wider interests on the Board. Industry respondents requested that the Board predominantly be made up of those with an understanding of the farming industry, livestock and animal disease (with a majority of places reserved for the livestock industry), while non-

industry responses supported the inclusion of wider interests on the board, suggesting that a balanced and objective make up of the Board was required.

Other suggestions made for who should sit on the board included the Livestock Auctioneers' Association (LAA), academic and research representatives, the farm Animal Welfare Council (FAWC), zoos, minor species, the Local Authorities Coordinator of Regulatory Services (LACORS) and public health interests. The equine sector supported a Board that had an understanding and experience of equine industry.

Some suggested that industry representatives should be impartial and not linked to a particular cause or industry body and that the Board should have an independent Chair and must have the trust of the industry. It was suggested that the skills of the individuals on the board was key to its success, and some concern was expressed over the availability of such candidates.

There was support for the Board to appoint the Chief Veterinary Officer (CVO), and for the CVO to be on the Board. There was strong support for a system of sector councils or expert sub-committees to feed into the Board on practical issues (particularly on veterinary, science and Research and Development issues).

Q3. Will the proposed arrangements ensure that our animal welfare objectives continue to be taken into account when tackling disease? If not, what further mechanisms should be included?

The vast majority of respondents disagreed with the proposed retention of welfare policy in Defra, and strongly advocated its transfer to a new body, should one be established. Reasons cited included:

- animal health and welfare are inextricably linked, as recognised by the Animal Health and Welfare Strategy;
- the proposed arrangements will not adequately ensure animal welfare will be taken into consideration;
- animal welfare is important during major disease outbreaks, eg during the FMD outbreak movement orders stopped food and oil deliveries and animals suffered;
- there was no convincing argument for this arbitrary division of responsibilities, and a suspicion that the idea of the separation was due to political expediency;
- the split was likely to undermine progress on animal welfare and it was disappointing to compromise UK's position as world leader in animal health and welfare;
- the separation of welfare and health would lead to confusion and complexity. It would also lead to lack of accountability when things go wrong with each body blaming the other;
- there is a risk of duplicated effort in inspection and compliance regimes, with increased costs for all;

- linked to this were concerns that delivery agents working to two bodies could have conflicting priorities; and
- concerns that animal welfare objectives could be compromised if the primary agency dealt only with animal health issues. The Hampton Principles require consistency and a reduction in the inspection burden on business, yet these proposals could lead to separate Government bodies, with an increased burden on business.

Alternative suggestions included:

- responsibility for *farm animal welfare up to the point of slaughter* to move to the new body;
- the new body, as a partnership between industry and Government, should decide welfare objectives. If the Government wanted policies that were not agreed with industry, Government should pay;
- FAWC should be incorporated within new body; and
- there should be an independent animal welfare commissioner to assess proposed activities of the new body and advise Ministers of potential welfare concerns.

Two respondents agreed with the proposal, recognising that it would be important to ensure that responsibilities for health and welfare were well co-ordinated under new arrangements.

Q4. Views are invited on whether the new body should be set up as a Non-Ministerial Department (NMD) or Non-Departmental Public Body (NDPB).

A majority of responses to this questions were in favour of a Non-Ministerial Department (NMD) although there was no such clear preference in the responses from the main livestock industry representative bodies, (some organisations made a reluctant choice, as they saw no need for a new body – see below).

Respondents that favoured an NMD did so as they believed that it would provide maximum independence and more autonomy from Ministers, and also provide VAT advantages. It was also considered by many respondents to be the model that would assist most in retaining experienced staff. It was felt that an NMD would be more efficient, enjoy streamlined decision making, and have more understanding of the community it served. It was also suggested that an NDPB would not command the respect of the industry - with some main livestock industry organisations stating that their support was conditional on any new body being a NMD.

The reasons given by those who expressed a preference for an NDPB included that an NDPB offered independence, allowing governance of its own budget, and being closer to the customer while allowing greater degree of Parliamentary and Ministerial oversight.

Although this consultation did not specifically ask whether people supported the creation of a new body, many respondents did not favour this proposal. Many respondents (including some of the main livestock industry representative bodies) did not see the value of a new body, or how it would improve the current system and realise the improvement sought, particularly in the current economic climate. They considered that improved partnership working would achieve similar outcomes and be cheaper, and that any new body would not truly be independent of Ministers. Concerns were also expressed that a new body would lead to further fragmentation of farmed livestock policy and delivery, and increase duplication and costs. There was also a view that Ministers would use the new body to avoid their responsibilities, and would use the new body as a scapegoat.

Of those who supported the new body, many placed conditions on their support – regarding proper independence, improved transparency and value for money. Some recognised the benefits of a new body, but felt Defra should wait for the European Commission’s proposals before acting. There were views that a specialist body could serve the customer (i.e. farmers) better and increase accountability of both Government and industry. It was considered essential that good links were in place with other areas – including the Defra Animal Welfare Team.

Q5. Views are invited on the proposed delivery arrangements to be established when the new body is set up. Are there specific changes to the current organisational structures that would improve delivery of animal health policies for the businesses affected?

The main points proposed were:

- the new body, and the Animal Health executive agency, must build close links to related bodies such as the Agriculture and Horticulture Development Board (AHDB) to engender good understanding of on-farm issues facing producers;
- a new body, if created, must minimise bureaucracy and cost, and needs a clear definition of its relationship with other regulatory bodies, especially Defra;
- it will be important to review how delivery and enforcement bodies work together once a new body is operational;
- clear lines of communication between and across agencies must be maintained;
- the new body must engage actively with stakeholders to gain their confidence, and so that farmers know which body does what;
- there needs to be stronger links between policy and delivery;
- the expertise and commitment to public health (currently present in Defra) must be retained when animal health moves to the new body;
- It is logical for Animal Health and the Veterinary Laboratory Agency (VLA) to be part of the new body, but differing geographical responsibilities need careful consideration; and
- there is a need for clarification on whether proposals include the entire delivery network transferring to the new body.

There were also concerns raised about the body's geographical limits and how this would affect the role of the GB-wide Animal Health executive agency and that of the UK's Chief Veterinary Officer (UKCVO). Some responses suggested establishing a separate delivery arm for Scotland. There were worries that the English new body would fail to agree policy with the devolved administrations, resulting in impasse or unclear negotiating lines for Ministers or the CVO in European and international negotiations. There were related fears that Scotland (and Wales and Northern Ireland's) route into Europe would be through an England-only body. There were also worries that the CVO would be too removed from Ministers, reducing his effectiveness.

Some respondents were keen to ensure that Great Britain and/or the United Kingdom's disease response capabilities were not compromised by any new arrangements, especially considering that Great Britain is a single epidemiological unit.

Q6. Views are sought on ways in which the Animal Health regulatory framework could be further simplified in order to reduce policy and administrative costs and improve customers / stakeholders experience of its operation in practice.

Respondents tended to answer this question in terms of how the new body should operate, including the operation as an English, rather than GB, body. With regard to the regulatory framework, suggested solutions included:

- giving priority to current reforms;
- a fundamental review of animal health and animal welfare legislation with rules being simple and easy to understand;
- a process of simplifying existing legislation;
- basing all disease orders on one model;
- ensuring legislation and guidance mirror each other, reflect actual risks, are easy to understand and are enforceable;
- keeping aquatic animal health regulation distinct; and
- changing legislation to be generic for livestock and not species specific, e.g. identification and traceability controls.

Some respondents felt that the new body would neither simplify the regulatory framework nor reduce policy and administrative costs.

Suggestions on how the body should operate included:

- using a private sector structure and ways of working;
- setting up with all new staff under private sector terms in order to drive down costs;
- ensuring delivery and administrative costs are effective and kept within reasonable boundaries;
- avoiding unnecessary costs;
- looking at best practice;

- facilitating, and not preventing, industry involvement in managing any outbreak;
- having a clear and transparent structure, avoiding duplication of responsibilities;
- having clear communication channels with other Government departments and agencies to improve efficiencies;
- maintaining a good working relationship (with new body and Defra);
- staying clear of excessive political interference;
- using relevant scientific expertise; and
- using cooperative working to reduce duplication of information and site inspections than currently occur.

Several respondents considered that the new body would be an extra layer of bureaucracy, and there were concerns that the proposed Board structure and the need for the Board to consult the many other relevant organisations would slow down decision making which is needed during an outbreak.

Local authority respondents generally felt that they have an excellent record of both proactive and reactive enforcement of the Animal Health Act, and that the framework agreement between local authorities and the Animal Health executive agency had led to more effective and efficient delivery through improved partnership working. This was a model to be followed by the new body.

There were concerns expressed over the geographical limits of the new body, risking a compromised disease response in the event of an outbreak affecting Scotland, Wales or Northern Ireland as well as England.

A number of respondents stressed that the new body must control and eradicate Bovine Tuberculosis, and must give priority to animal health over public opinion, being committed to a science-based policy. It was also widely felt that the body must be fully committed to keeping exotic animal diseases from entering England / Great Britain.

Q7a. Views are invited on the proposed funding framework including the activities to be initially co-funded between Government and revenue payers.

There was a very strong and widely held view that the Government should continue to pay for all activities as the benefits provided were to the economy or society as a whole. Some suggested that the retail chain or the wider food industry should contribute to the overall costs.

There was much concern that there was no guarantee that the 50% cost sharing principle would not increase once implemented, although some suggested that the proposals should be implemented gradually over a number of years or that limited activities should be funded in this way in the first instance, increasing over time.

There were comments that Defra had failed to recognise the costs currently borne by livestock keepers.

Responses from all bodies representing livestock sectors opposed both the principle and much of the detail of the proposals to share costs for two specific elements of Defra's animal health responsibilities: the preparedness and surveillance work in relation to exotic diseases; and the Department's costs in dealing with an exotic disease outbreak.

One point that featured in a number of responses was the wish for industry to scrutinise Defra's current spend and allocations to satisfy themselves on value for money and identify possible savings ahead of the introduction of any requirement to jointly fund a small part of that work. Other recurring themes in the responses were that the levy must be fair, affordable and take account of the individual's ability to pay and that prevention of animal disease is for the public good and therefore should be publicly funded.

Many responses also considered that it was inequitable for a levy to be imposed in England but not in the other component parts of the UK, putting English farmers at a competitive disadvantage. It was generally felt that this would give rise to further cross-border disease management problems.

There were some views that a levy should not be implemented in England prior to the introduction of any EU-wide framework. Fears were expressed over creating competitive disadvantage with the rest of Europe and encouraging greater low priced import penetration. While a number of responses argued for delay until EU harmonisation proposals, none of the main representative bodies did so.

Q7b. Views are invited on the proposed funding framework including proposals for distribution of costs between sectors according to the gross sector output or on alternative ways of distributing costs.

Most respondents considered that gross sector output should not be used as a method to allocate costs to sectors, as gross output does not reflect profitability, ability to pay or susceptibility to disease and that any method must take into account the relative risks of each sector. There was also a view that the new body should have the responsibility for this decision.

Many respondents agreed that allocations between sectors should be done on a concept of economic worth of the product however some felt that allocation based on gross sector output ignored the leisure sector, such as horses and hobby farmers.

Other suggested methods for distributing costs included:

- net margins;
- net sector output;
- actual cost of each sector not gross output;

- relative share of total farm business income – more directly related to income and indirectly to ability to pay;
- based on dedicated services provided to a specified industry with the residual, central shared costs being allocated proportionately;
- based on animal disease risk posed;
- use of Livestock Units; and
- increased general taxation.

Q7c. Views are invited on the proposed funding framework including proposals for the levy-funded share of the costs or alternative suggestions and their justification.

Many respondents stated that all costs should continue to be funded through Government and taxation and questioned the basis for a 50:50 split. Many commented that it was unacceptable for industry to foot the bill for disease incursions that were out of their control and that border controls needed to be improved to reduce future disease outbreaks. It was suggested that a levy on imported products derived from animals could be used to help fund the costs of increased and more effective checks at ports of entry.

It was suggested that a charging structure could be developed to recover the costs and inspection and licensing to those businesses that carry out “high risk” activities that could introduce or facilitate the spread of exotic disease. It was also suggested that the further up the food chain the levy was collect the more efficient the collection would be. Other suggestions included a levy on supermarkets, slaughterhouses or animal transport.

There were comments that Defra had failed to recognise the costs borne by livestock keepers and concern was raised that a levy would raise the costs of home produced products rendering them less competitive against imports. It was suggested that the industry’s economic position and ability to pay should be taken into account when setting the levy to maintain competitiveness.

Concern was expressed that power will be given to the new body to increase the amount collected from industry and that a limit or cap on the maximum contribution required from industry was needed.

Q7d. Views are invited on the proposed funding framework including the use of an insurance requirement as a basis for the industry contribution to the costs of exotic disease outbreaks.

A variety of views were expressed, ranging from a belief that an insurance solution would be the best way to fund outbreak costs, through to a belief that no contributions (whether from insurance or levy) should be gathered in advance, if at all. Respondents from the horse sector expressed greater agreement with the use of insurance for outbreak costs and highlighted the sector as a good example of where insurance is widely used.

The main argument supporting the insurance option related to fairness and transparency, while both those in favour and those against expressed a high

level of scepticism that the insurance industry would want to cover such risks and, if they did, that premiums would be unaffordable.

The insurance industry itself raised a number of concerns that would need to be overcome before suitable products were likely to be offered. These included the difficulty in assessing the risks, the level of total liability and the uncontrolled nature of claims, in particular that the Government would effectively make the claim, citing the costs incurred, providing little opportunity for the insurance companies to challenge costs or liability.

Various related issues were also raised, including "Moral Hazard" where the security of an insurance against a risk fails to provide the incentives for insurance policy holders to behave in a way to minimise that risk. However, others suggested appropriately structured premiums would encourage compliance with regulations.

The 2007 FMD outbreak, which was caused by a leak from a Government-regulated facility, was cited as reason for not charging for exotic disease outbreak costs.

Q8a. Views are invited on these proposals for the levy mechanism and in particular on the species to be covered initially (and whether horses should be included).

This question generated more responses than any other, with over 100 organisations and individuals contributing their thoughts. Of these, around 70% were concerned with the equine sector. Many respondents from the equine sector responded only to this question or this and a limited number of other questions. The vast majority of respondents who addressed whether horses should be included in the levy mechanism opposed this suggestion. The main reasons put forward included:

- the cost of setting up and maintaining the existing National Equine Database (NED) and the horse passport system; many respondents feared that a levy system would be equally costly to set up and run. Many respondents were reluctant to see more regulatory burdens placed on the sector so soon after the introduction of NED and passports;
- a levy on horses, applied in the same manner and for the same reasons as a levy on "farmed" or "agricultural" animals, would be unfair. Respondents highlighted the different tax and planning regimes enjoyed by the agricultural sector compared to the equine sector; it was viewed that agriculture was at a significant practical and economic advantage;
- horses are kept for pleasure, distinct from the economic reasons for keeping farmed animals, and so should be excluded from the levy; and
- many owners/keepers have few horses compared to the typical number of animals kept by "farmers"; this gives rise to a poor cost:benefit ratio for the horse sector.

Other reasons and comments relating to the equine sector included:

- prediction of wide-scale avoidance of the levy, quoting similar problems in the sector with NED and passports. Defra should develop and utilise existing horse passports and NED systems rather than introduce an additional IT system;
- a new levy would reduce owners and keepers' spend on other equine health and welfare matters, causing a large increase in the number of abandoned animals;
- horses are unlikely to be affected by exotic diseases. Related to this, it was argued that it is easy to keep Great Britain free of disease, thereby negating the need for a levy. Strengthening the Tripartite Agreement was suggested as a way of doing this;
- the problems of low value animals such as New Forest and other ponies was raised. A £10.50 levy would be disproportionate to the animal's value;
- only high value animals' keepers (racing and bloodstock) should pay the full value of all the equine sector's calculated contribution;
- the proposals are simply unaffordable for the equine sector;
- Government should spend money to help the horse sector rather than to hinder it;
- it is unfair to tax companion/enjoyment animals such as horses and donkeys; and
- Defra should establish a satisfactory equine disease control strategy before passing any cost to the sector.

Comments were also received relating to the inclusion of other species. These included:

- a belief that all kept animals should be included (cats, dogs, fish mentioned specifically);
- all animals that enter the food chain should be levied;
- game birds should be completely excluded from the levy; if included they should be treated differently to "mainstream poultry" due to the seasonal rearing of game birds, and different tax regime in the sectors;
- recognised research establishments, zoos and collections should be excluded from levy; and
- the levy should focus initially on a few main species, and be extended later if the new body feels it necessary.

Q8b. Views are invited on these proposals for the levy mechanism and in particular on whether minimum thresholds for payment should be set and, if so, on what basis.

This question attracted relatively few responses, compared to others in the consultation document. Respondents expressed a range of opinions, with around 60% opposing the use of a payment threshold under which many keepers would be excluded from making any payment.

A number of respondents saw economic sense in applying thresholds, and accordingly supported the idea. Others recognised the issue, but believed that it was more important to send a signal to all keepers that they had a responsibility to maintain healthy animals. The comment was made several times that all animals present some degree of risk, so all keepers should contribute financially to the scheme.

Of those who opposed setting a minimum threshold, there was a high degree of support for the idea that all keepers pay a flat registration fee, with a top-up for keepers of larger numbers of animals. Other alternatives put forward included using a risk-analysis system to determine which keepers should be subject to a levy, and to differentiate payments.

Q8c. Views are invited on these proposals for the levy mechanism and in particular on whether there should be one rate for all cattle or different rates for beef and dairy based on the value of the gross output of each sector.

Fewer than twenty respondents expressed a view on this question. Of those that expressed a clear preference, around twice as many supported a single rate as supported a different dairy and beef rate.

Arguments for a single rate included simplicity, prevention of mis-declaration of beef animals as dairy or vice-versa, complexity for mixed farms, and the fact that both types of animal are susceptible to the same diseases. Those supporting different cattle and beef rates focussed on the different nature and output of the two sectors.

Some equine stakeholders commented on this question, drawing a parallel with the horse world, where leisure horses, sport horses, working horses, race horses and thoroughbreds could all be split due to their differing purposes and outputs, despite being of the same species.

Q8d. Views are invited on these proposals for the levy mechanism and in particular on how the impact on the viability of the industry of a particular levy rate could be assessed and taken into account in setting the levy.

Many respondents expressed concern over farmers' ability to afford the levy and that the impact would be difficult to assess. Suggested approaches included:

- use of close analysis of industry profitability and industry costs of protecting animal health;
- decisions to be fair and transparent;
- use of good data;
- only profitable sectors should have to pay the levy; and
- profitability should be the key for setting levy rates, not farm income.

Various sectors said they were unable to afford the levy. Representatives of the egg and poultry sectors called for a limit on sector liability – they cited the Joint Industry-Government Working Group (JIGWG) report of July 2006 which recognised this and said that during an outbreak the viability of the farming base must be preserved. It was pointed out that the EFRA Select Committee report of 2008 said Government should not further disadvantage the pig sector by legislation and it was asked how the Responsibility and Cost Sharing (RCS) proposals could be reconciled with this recommendation. Another respondent suggested a five-year rolling system to help business planning, building in ability to pay, with independent assessment.

There were calls for discussions on the levy's impact and many respondents, including the NFU, said introducing the levy might result in farmers reducing livestock numbers or leaving farming. The levy would cause significant additional stress in an industry with a high level of suicides and stress. There was concern that Welsh, Scottish and Northern Irish livestock producers would have competitive advantage over English producers, and the levy would make English farmers less competitive to imports from third countries. One suggestion was to levy food production or impose a levy on third country imports, instead of on livestock.

Of those who expressed a view, there was agreement that the differences in levy rates would be insufficient to change behaviour, but if based on factors eg proximity to a lake with wildfowl, levy incentive would be seen as unfair, especially as it penalised types of farming that the Government was encouraging in other policies. Some respondents instead suggested a one-off annual fee for all animals (including pets). There was some support for high risk groups paying a higher levy.

The zoo sector expressed concern that the levy would threaten continuation of managed programmes for threatened species and put UK zoos at a disadvantage with zoos in other member states. Charities considered they should be exempt from costs of registration and levy. The horse sector comments included: the levy would result in cost cutting on welfare and essential preventative measures eg vaccination; and the viability of the industry would be affected.

Warwick University called for the levy to be hypothecated to the aims and objectives of livestock health & welfare, and for the new body to have sufficient funds “ring fenced” to carry out its own tasks effectively.

Q9. Views are invited on the proposal for an animal health strategy board, its role and composition.

There was general support for an animal health strategy board although some respondents confused this board with the Board of the independent body. There were some views that the board should cover welfare and could take forward the Animal Health and Welfare Strategy.

There was a vast array of suggestions for membership of the board including industry representatives from farm, through processing, retailing and consumers, Department of Health, Defra, veterinary representatives, zoo community, the Royal Agricultural Society of England (RASE), the Rural Payments Agency (RPA) or Meat Hygiene Service (MHS), the National Farmers Union (NFU), an independent consultant *without* livestock knowledge, the British Horse Industry Confederation (BHIC) or lead bodies for specific sectors of equine industry, public health and health protection representatives, LACORS/Local authorities, large retailers, academics, fish and welfare representatives.

S1. Other comments relating to small-scale and hobby keepers

Some considered that one of the major potential benefits from the proposals is the updating and co-ordination of keeper and animal registration, making the tracing of disease easier and more efficient. It was felt essential that such registration should apply universally, on the basis that susceptible animals kept in small numbers are often as much of a disease risk to the industry as a whole as are larger groups of animals.

However, there was concern that the cost of administration of the levy for small numbers of such animals might exceed the amount of levy recovered. (see also *Question 8b* on the use of thresholds).

S2. Miscellaneous comments

It was suggested that the Government operates inadequate border controls to prevent illegal imports of meat and meat products and does not police legal imports with sufficient rigour, so leaving the UK livestock sector at risk of exotic disease incursions. Another criticism was that the Government was responsible for the 2007 FMD outbreak and is responsible for the continuing spread of Bovine Tuberculosis. In view of this, it was unacceptable to seek cost sharing with the livestock sector.

A further concern in a number of responses was the lack of clarity on how the role of the CVO might be affected by the proposals. Assurances were sought that the CVO would continue to have the pre-eminent role in responding to exotic disease outbreaks. There was also a recurring wish that the CVO continue to have direct access to Ministers.

There were some calls for an exemption from any levy for registered charities who already make a valuable contribution in terms of cash and expertise in pursuit of disease prevention and control.

Many of the responses from horse interests were critical that the consultation process did not go widely enough to reach genuine horse owners, with the lack of inclusion of the horse breed societies being cited as a case in point.

Clarity was sought on whether aquaculture is to be included within the scope of any new body. It was pointed out that circumstances of aquatic animal farming are clearly quite distinct from terrestrial farming, as has been the application of Government policy during the development of English aquaculture.

It was suggested that enforcement of any registration requirements and an effective system for collection of the levy payment requirements will be key. Communication of the tangible benefits to keepers will therefore be important to promote compliance.

Concern was expressed that the possible inequitable approach between the different devolved areas could also impact on the way the pet food industry conducts business in the UK. This could in turn adversely influence its position in Europe.

3. The way forward

Following the conclusion of this consultation exercise, the Government intends to publish a draft Bill by the end of 2009 for pre-legislative scrutiny in early 2010, with a view to its introduction early in the new Parliament, subject to Parliamentary time being available. This draft legislation will set out in detail how the Government intends to proceed, taking into account all comments received during the March 2009 consultation process.

The animal health strategy board has now been superseded by the Responsibility and Cost Sharing [Advisory Group](#)¹, chaired by Rosemary Radcliffe.

Full information about the Responsibility and Cost Sharing Programme is available on Defra's [website](#)².

¹ <http://www.defra.gov.uk/foodfarm/policy/animalhealth/sharing/advisory-grp/index.htm>

² <http://www.defra.gov.uk/foodfarm/policy/animalhealth/sharing/index.htm>

Annex A

List of Respondents

1.	ADAS
2.	Association of British Insurers (ABI)
3.	Association of Independent Meat Suppliers (AIMS)
4.	Associations of Government Veterinarians (AGV)
5.	Assured British Meat (ABM)
6.	Banham Zoo
7.	BIAZA - British and Irish Association of Zoos and Aquariums
8.	Biotechnology And Biological Sciences Research Council (BBSRC)
9.	BPEX
10.	British Alpaca Society
11.	British Association for Shooting & Conservation (BASC)
12.	British Association of Parks, Piers & Attractions Ltd (BALPPA)
13.	British Cattle Veterinary Society
14.	British Driving Society
15.	British Egg Industry Council (BEIC)
16.	British Equestrian Trade Association (BETA)
17.	British Equine Veterinary Association
18.	British Hanoverian Horse Society
19.	British Horse Industry Confederation
20.	British Horse Society
21.	British Horse Society Regional Welfare Officer (Southern) Thames Valley Police Equine Liaison Volunteer
22.	British Lead Body for Performance and Sport Horses and Ponies (PSHP)
23.	British Pig Association (BPA)
24.	British Poultry Council (BPC)
25.	British Small Animal Veterinary Association (BSAVA)
26.	British Trout Association
27.	British Veterinary Association (BVA)
28.	British Veterinary Poultry Association
29.	Cambridgeshire County Council
30.	Centre for Rural Policy Research, University of Exeter
31.	Country Land & Business Association (CLA)
32.	Countryside Alliance
33.	Dairy UK
34.	Devon County Council Trading Standards Service
35.	Devon Rural Network
36.	Dudley Zoo
37.	East of England Trading Standards Association Limited (EETSA)
38.	EBLEX
39.	Environment Agency

40.	Equine Market Watch Sanctuaries UK
41.	Family Farmers' Association
42.	Farm Animal Welfare Council (FAWC)
43.	Fenland Wildfowlers' Association
44.	Food and Biomass Renewables Association (Fabra)
45.	Food Standards Agency (FSA)
46.	Game Farmers' Association and National Gamekeepers' Organisation – joint reply
47.	Goat Veterinary Society
48.	Hall Mark Meat Hygiene Ltd
49.	Health Protection Agency
50.	Heath Lambert Ltd
51.	Heather Trust
52.	Heythrop Hatchery
53.	International Zoo Veterinary Group (IZVG)
54.	Jersey Cattle Society of the UK
55.	League Against Cruel Sports
56.	Livestock Auctioneers Association Ltd
57.	Local Authorities Co-ordinators of Regulatory Services (LACORS)
58.	Malthouse Surgery
59.	McCartneys LLP
60.	Millins Chartered Insurance Brokers
61.	Mission and Public Affairs Council of the Church of England and the Arthur Rank Centre
62.	National Beef Association (NBA)
63.	National Consumers Federation
64.	National Fallen Stock Co
65.	National Pig Association (NPA)
66.	National Sheep Association (NSA)
67.	National Trainers Confederation
68.	New Forest Commoners Defence Association
69.	New Forest Equestrian Association
70.	NFU
71.	NFU Scotland
72.	Northern Ireland Horse Board
73.	NorthWest SFFS
74.	Pet Food Manufacturers Association
75.	Pig Veterinary Society
76.	Royal Association of British Dairy Farmers (RABDF)
77.	Royal College of Veterinary Surgeons
78.	Royal Institute of Chartered Surveyors (RICS)
79.	Royal Society for the Protection of Birds (RSPB)
80.	RSPCA
81.	Scottish Agricultural College

82.	Scottish Branch of the BVA
83.	Scottish Equine Breeders Association (SEBA)
84.	Scottish Executive
85.	Sheep Veterinary Society
86.	Society of Practising Veterinary Surgeons
87.	South Essex Insurance Brokers Ltd
88.	Stoneways Insurance Services Ltd
89.	Tenant Farmers Association
90.	The Badger Trust
91.	The British Deer Society
92.	The Chaplaincy for Agriculture and Rural Life
93.	The Donkey Sanctuary
94.	The Thoroughbred Breeders' Association
95.	Trading Standards Institute
96.	United Saddlebred Society (UK) Ltd
97.	University of Warwick
98.	Upper Teesdale Support Services (UTASS)
99.	Verderers of the New Forest
100.	Waitrose
101.	Wellcome Trust
102.	World Horse Welfare
103.	72 private individuals
104.	4 Respondents requested confidentiality