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Dear Mike

FAWC Response to Defra Consultation on a New Independent Body for Animal Health

The main proposal relating to farm animal welfare within the Consultation is that responsibility for animal welfare policy, and for ensuring that the policy and delivery landscape is working effectively, remains within Defra. The Consultation document provides the rationale behind this proposal and refers to appropriate working relations between the new body and Defra to ensure that animal health and welfare are not considered in isolation. This is vital if the new independent body for animal health is established.

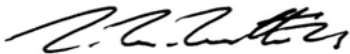
It is important that animal health and welfare policy are not (and are not perceived as being) separated because there is an opportunity for the new body to promote animal welfare to stakeholders alongside disease risk management, given its likely closer relations with industry. Animal welfare considerations need to be embedded in the relations that producers have with the new body (and its delivery agents) and with the disease management decisions that are taken. FAWC is concerned that delivery agents will be working to two bodies (i.e. Defra and the new animal health body), which at times might have conflicting priorities.

Membership of the board of the new body should include knowledge and expertise regarding animal welfare. There is no reason why FAWC should not work alongside the new body on aspects of farm animal welfare (e.g. in relation to the links between disease/disease control and welfare), just as it does with the implementation groups in England, Wales and Scotland, for example. This would fit with its primary role to provide advice to Government. Indeed, FAWC would welcome this new relationship to ensure that welfare does, indeed, remain a key consideration for the new animal health body.

It is important that the working arrangements between Defra and the new body – whether through Service Level Agreements or other means – allow the new body to provide input to animal welfare policy decision making and to have the responsibility to consider, and pay due regard to, the welfare requirements of farm and other animals when deciding policy to control animal disease. The primary responsibility for both animal health and animal welfare lies with animal keepers and they must be appropriately encouraged and rewarded for good practice that potentially improves both the health and welfare of their animals and the animals of others.

The Consultation proposes an animal registration and levy/insurance system to help fund the activities of the new body and to incentivise good practice. Registration is likely to provide benefits for animal welfare surveillance, inspection and enforcement activities. All livestock keepers should be included. Consideration should be given to whether the proposed registration/levy/insurance system could also be used to help encourage and incentivise good practice regarding animal welfare. It is important that the levy expected from animal keepers should be kept at affordable levels. If levy payments are set too high, then not only would farm profitability and competitiveness be affected but it could also have a potentially negative effect on animal welfare as producers may cut back on animal input expenditures such as veterinary and medication costs, housing, bedding, feed, stockperson training etc.

Yours sincerely



Professor Christopher Wathes
Chairman, Farm Animal Welfare Council