Dear Sir / Madam

A Consultation on the Future Delivery of Scanning Surveillance for Animal Related Threats in England and Wales

Thank you for inviting the Farmers’ Union of Wales to contribute to the above consultation. Following an internal consultation with its twelve County Branches, the Union submits the following comments for your consideration.

**Question 1. Do you agree with the four stated purposes for spending public money on scanning surveillance?**

The majority of members agreed with the four stated purposes for spending money on scanning surveillance. Members recognised the importance of the early detection of new and re-emerging animal diseases and stated that an effective and affordable system, with improved geographic coverage, could increase producer participation.

**Question 2. Do you think that the systematic use of a wider range of surveillance data sources will improve detection of new or re-emerging threats, in light of the reduced volume of laboratory based diagnostic data from AHVLA?**

The Union agrees that there is ‘a need to make efficient and effective use of existing sources of data to ensure best use of resource and to provide benefits for all stakeholders’. Changes from the norm, including the presence of previously unidentified diseases, will be detected through information required from farmers, veterinary practitioners, slaughterhouses and laboratory testing of samples. Any reduction in the volume of laboratory based diagnostic data from AHVLA must be met with improved information collection and analysis from the other sources described. Enhanced, cost-effective collaboration and communications between the various sources of surveillance information will be essential to ensure that protection from animal disease threats is maintained or improved.

The AHVLA surveillance system has historically relied on its relationship with veterinary practitioners to collect a wide range of surveillance data. At present scanning surveillance in England and Wales is carried out mostly by the provision of a post-mortem (PM) examination and diagnostic service by AHVLA working in partnership with private veterinary practitioners.

However, several members commented that an increased emphasis on other methods of gathering surveillance information and data could conceivably reduce both geographical and species specific gaps in the surveillance data currently collected and could improve the probability of detecting a disease threat.
As the Union understands it, there is presently no direct route of information transfer from veterinary practitioners undertaking a non-diagnostic diagnosis of animal disease on-farm to staff or databases within the AHVLA. Diseases which are identified by veterinary practitioners through an observation of clinical signs on-farm (non-diagnostic) are therefore largely under-represented in the current surveillance model. Given that one component of scanning surveillance is to ‘detect changes in the occurrence of endemic diseases and to understand why such change has occurred’ increased information transfer which utilises local veterinary knowledge is essential. Local veterinary practitioners are well placed to identify re-emerging disease in a local environment and the addition of non-diagnostic disease data into the AHVLA database would therefore be well warranted.

The Union therefore believes that detection of new and re-emerging threats could be improved by utilising non-laboratory based data through the enhanced involvement of veterinary practitioners as described above.

**Question 3.** The use of additional data sources is likely to incur costs, both to collect and to analyse. Which additional four data sources, taking into account data protection issues, do you think would be of the most value to improve scanning surveillance?

The majority of members stressed the importance of utilising the knowledge and expertise of veterinary practitioners. Data sources deemed to be important by members included active collection by private veterinarians, official veterinary visits, government and private laboratory networks, university surveillance networks, herd health schemes, slaughterhouse data, mortality data and active collection from farms.

Several members suggested that universities may be of benefit in providing unique and detailed disease specific data collection and analysis which is specific to a given research project or research collaboration.

**Question 4.** There are many advantages of having a single veterinary team across AHVLA. Can you see any potential problems from combining the veterinary roles involved in scanning surveillance and those undertaking regulatory activities?

With the caveat that there is appropriate training, the retention of expertise and a maintenance of ground-level contact with livestock keepers, members did not foresee any significant problems resulting from the combining of roles as described above.

**Question 5.** Are the functions of the Species Expert Groups appropriate? What other functions, if any, should they fulfil?

The majority of members believed that the functions of the Species Expert Groups were appropriate.

The Union would seek to ensure that there is sufficient communications to allow timely and relevant information dissemination between the Species Expert Groups and the wider industry.

Alongside consultancy with veterinary practitioners, several members suggested that, where appropriate, the Species Expert Groups should engage in the provision of specialised training to veterinary practitioners.

**Question 6.** Should there be any other Species Expert Groups formed?

Several members suggested that it may be appropriate to form a sheep expert group which is distinct from the small ruminant group. Several members also suggested the addition of an equine group.
**Question 7.** Do you think that these proposals, together with services available from non-AHVLA providers, will ensure the availability of a timely and cost effective diagnostic service of appropriate quality for farmed animals?

The Union is concerned that the main driver for change is to reduce Government spending on animal disease surveillance and that this could reduce the effectiveness and capabilities of future scanning surveillance. The Union notes that any PM examination and subsequent testing not directly linked to scanning surveillance will be charged at full cost and that, under the present proposals, it is envisaged that AHVLA will commission fewer follow on laboratory tests free of charge from PM examinations due to the use of specialist veterinary pathologists and a more risk based approach to testing. According to the present consultation, the introduction of these changes is estimated to reduce post-PM Government spending by 30%.

PM examination is essential in the diagnosis of clinically difficult diseases. Moves towards the use of alternative approaches must therefore only occur when it is appropriate to do so and where the timing and accuracy of diagnosis will not be affected.

**Question 8.** Do you agree that engagement with veterinary practitioners is a powerful method of scanning surveillance to detect new threats?

Members agreed that engagement with veterinary practitioners is a powerful method of scanning surveillance to detect new threats.

The Union notes that the proposals outlined place an increased emphasis on the discernment and ability of the submitting veterinary practitioner and that, under the proposals outlined, it will become the responsibility of the veterinary practitioner to select the tests required.

The Union notes that AHVLA vets will work with practices to receive and provide training as appropriate, and that such training includes sampling PM examinations for routine conditions and sample selection for diagnosis of common disease conditions. It is essential that any increase in the responsibility placed upon veterinary practitioners is met with adequate support in order to ensure that there is not an associated reduction in the ability of AHVLA to undertake scanning surveillance.

**Question 9.** Do you think that the Centres of Species Based Expertise will bring benefit to the scanning surveillance system? Please explain the reasons for your response.

The majority of members responding to this section of the consultation believed that the Centres of Species Based Expertise would enhance the current scanning surveillance system by providing a central point of information access and dissemination.

**Question 10.** The scenarios presented show a range of three possible options for the location and type of PM examination facilities. Do you think that, combined with a carcase collection system, they would provide sufficient access to PM examination facilities?

At present, approximately only 50% of livestock holdings have access to a surveillance PM examination facility within a one hour drive and there is relatively poor surveillance coverage for some sectors of the livestock industry, such as sheep.

The provision of extra locations for PM examination facilities is welcomed if such provision reduces the costs conferred to livestock producers, improves overall access to the surveillance network and maintains or improves the ability of AHVLA to undertake scanning surveillance.

**Question 11.** Which of the three scenarios do you think is the best?

Following consultation with FUW membership, no majority decision was reached on this issue.
The Union would seek assurances that farmers in Wales will not be disadvantaged following any redistribution of facilities.

**Question 12. How should the transport of carcasses from collection centres to PM examination sites be organised?**
The Union welcomes moves to improve the ease at which carcases may be submitted. The Union notes that, under the scenarios provided, approximately 75% of animal holdings will be within a one hour drive of a PM examination site or carcase collection point.

Several members stated that collection points at veterinary surgeries and a dedicated collection service could be of benefit. A carcase collection service which collects from practical and easily accessible locations would be welcomed.

**Question 13. How should the carcass collection service be funded?**
Any carcase collection service should be managed to minimise journey times / mileage and should be undertaken in the most efficient manner possible in order to reduce the associated costs of the service.

Members responding to this section of the consultation believed that the costs of a carcase collection service should be primarily borne by a proportion of the AHVLA estate savings and that such savings justified a Government funded collection service.

**Question 14. Some options show a reduction in AHVLA sites and increase in other providers Do you agree that other non-AHVLA providers should be used to provide PM examination capacity that can support scanning surveillance?**
Members responding to this section of the consultation agreed that other non-AHVLA providers could be used to provide PM examination capacity that can support scanning surveillance.

The Union would stress that differences in provider capabilities and requirements must be evaluated in order to account for the suitability of each potential provider in each different location.

**Question 15. Do you think that the proposed structure will bring effective governance and ensure the system is able to respond to changing circumstances in the future?**
Members responding to this section of the consultation stressed the importance of ensuring that farm level input is well represented within the governance structure proposed.

**Question 16. A model for reducing public expenditure on scanning surveillance is proposed. Do you have any ideas or views on how further savings could be made or on other potential sources of funding for the system?**
Members were consulted on this issue and no matters were forthcoming.

**Question 17. What activities or skills that are needed for scanning surveillance do you think are best provided by government (via AHVLA)? Which of these are most important?**
A range of expertise is essential for an effective scanning surveillance system.

Scanning surveillance enables early detection of new and re-emerging animal disease threats and effective surveillance can function to significantly reduce the impact of a disease outbreak. The Union notes that, amongst other issues, the present surveillance programme has been responsible for the early detection of pandemic (H1N1) 2009 influenza virus in pigs, bovine tuberculosis in non-bovine species, antimicrobial resistance in Salmonella, virulent psoroptic mange in cattle, and the
introduction of Schmallenberg virus. Scanning surveillance also detects food safety threats and helps to fulfil statutory national and international disease reporting requirements.

Given the wide range of diseases, associated pathologies and detection methods encompassed within scanning surveillance, the Union believes that skill sets relating to pathology, species expertise, parasitology, microbiology, virology and the like, will be of importance during routine scanning surveillance.

Question 18. Are there any scanning surveillance activities currently carried out by AHVLA that you think could be, or should be, provided by other organisations? If yes please provide further details.
One member suggested that, of the skill sets listed, those relating to epidemiology and disease consultancy could be applied on an *ad hoc* basis as such skill are generally only applied under certain circumstances.

Question 19. Should industry or other non-Government groups share more of the cost of scanning surveillance?
One major purpose of scanning surveillance is to provide Government with evidence on animal health and welfare in order to reduce the risk of threats to public health, trade, welfare and wider society from animal diseases. Members unanimously believed that the costs of scanning surveillance should therefore primarily be borne by Government.

Question 20. Any additional comments?
Livestock producers represent the fundamental primary source of animal disease information and it is this information which provides the backbone of any scheme or programme dedicated to scanning surveillance.

Any reorganisation or restructuring must not hinder the ability of farmers to engage in scanning surveillance activities. Furthermore, it is essential that any associated costs do not preclude producers from participating and providing the raw data for subsequent analysis.

Changes to the current scanning surveillance programme must protect current and future PM expertise and capacity in Wales and change should only occur where it serves to strengthen existing surveillance strategies.

I trust that due consideration will be given to the preceding information.

Yours sincerely

Dr Hazel Wright
FUW Senior Policy Officer