



**identify as Welsh**

Are you a CAP recipient?	Yes	
	No	

If you responding as an individual, what age bracket are you in?	Under 18	
	18-34	
	35-49	
	50-64	
	65+	

### How to respond

Responses should be returned by **26 March** to

Land Management Reform Division  
 Welsh Government  
 Cathays Park  
 Cardiff  
 CF10 3NQ

Responses completed electronically to be sent to:  
[AgricultureWalesWhitePaper@gov.wales](mailto:AgricultureWalesWhitePaper@gov.wales)  
[PapurGwynAmaethCymru@llyw.cymru](mailto:PapurGwynAmaethCymru@llyw.cymru)

### Regulatory Reform

1. What are your views on:
  - (a) The proposed approach to the creation of the National Minimum Standards?
  - (b) The need for flexibility to amend the National Minimum Standards where necessary? Are there any further considerations which are needed?

Please provide comments to support your view e.g. potential benefits and impacts.



2. What are your views on:

(a) How advice and guidance can effectively support farmers to understand the National Minimum Standards; and

(b) The further considerations needed for advice and guidance? For example, what form guidance should take, who should provide it, the scope of guidance and how farm advisory services may support farmers.

Please provide comments to support your view, e.g. potential benefits and impacts associated with the considerations.

To ensure the updated regulations can have an impact on the ground, it will be essential that they clearly define the

3. What are your views on the proposals for civil sanctions to enable proportionate enforcement of regulations? Are there any further considerations which are needed?

Please provide comments to support your view, e.g. potential benefits and impacts associated with the considerations.

This is not our area of expertise, but we support sanctions which are proportionate to the non-compliance or offence.

It will be important to recognise the impact the threat of sanctions, penalties and civil proceedings can have on a farmer's mental wellbeing, and the risks this poses to their health. This must be taken into account when deciding what is a proportionate response.

## **SLM Future support**

4. What are your views on the proposed purposes for funding in support of the delivery of SLM? Are there other purposes which you feel should be considered?



needs and natures of farmed animals, and should not depend on prolonged or routine use of pharmaceuticals, or on mutilations.

Approaches to, and policies on, sustainable animal agriculture must ensure that farm animals have a good life and a humane death. To be considered sustainable, production systems should work towards positive health outcomes, the five animal welfare needs<sup>3</sup> and adhere to [OIE standards for animal health and welfare](#), offering stimulating living environments to allow for the performance of highly motivated

We support the scheme being collaborative, industry-led and cohesive across the UK. Good animal health and welfare is paramount from farm to fork. We therefore support the focus being on the entire supply chain rather than restricted to land management businesses only, to help improve animal health and welfare at all stages



Their small capital grants scheme has proved successful, for example providing;

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## Collection and sharing of data

### 6. What are your views on the proposed purposes for collecting, sharing and linking data?

Please provide comments to support your view e.g. potential benefits and impacts.

We support improving provisions to collect and process of data, and the introduction of new technology which can help to streamline the systems. We are pleased to see that the white paper recognises that it will be important to remain consistent with the rest of the UK to enable analysis at a national level.

The UK has a well-established network of scanning surveillance which can be enhanced through the exploration of new data sources and data collection and feedback practices. BVA supports the use of syndromic surveillance or 'health informatics'<sup>8</sup> to increase the coverage of the current scanning surveillance network across species sectors. Syndromic surveillance – that is to say the realtime collection, analysis, interpretation and dissemination of health-related data – enables the early identification of the impact (or absence of impact) of potential human or veterinary public-health threats across species areas.<sup>9</sup>

The continuous monitoring of new and emerging disease through data collection, analysis and sharing across species provides high-quality intelligence on animal health and welfare. This enables policy makers, veterinary professionals and animal keepers to take decisions to improve animal health and welfare, productivity, and identify and manage threats to public health, trade, food quality, the environment and leisure and tourism. Official statistics put the value of UK livestock outputs at £12.7 billion<sup>10</sup>, and the value of UK aquaculture outputs at £0.59 billion<sup>11</sup>. A robust surveillance system is integral to the realisation of these high-value outputs.

BVA has produced a detailed policy position on veterinary scanning surveillance which outlines our vision for animal health and disease monitoring post-Brexit<sup>12</sup>. The development of a new agriculture policy presents an opportunity to modernise and optimise our animal health and disease monitoring networks. This can be achieved through:

- Maintaining the current level of Government resource spent on the scanning surveillance network

- Adopting new approaches to data collection and feedback

- Optimising appropriate skills and expertise

Articulating the value of surveillance reporting to the veterinary profession and other stakeholders through education to increase awareness and participation

Working collaboratively with stakeholders to explore innovative communication strategies

The establishment of a body to oversee and co-ordinate surveillance policy across the four administrations of the UK

Vets work closely with farmers and keep a range of records. They could therefore be very helpful during when collecting data and should be consulted as part of the assessment process.

**7. What are your views on the establishment of a national database for farms and livestock?**

Please provide comments to support your view e.g. potential benefits and impacts.

We support improving provisions to collect and process of data, and the introduction of new technology which can help to streamline the systems. A national database could improve accessibility and compliance.

A new national database could offer opportunities for improved monitoring of new and emerging disease through data collection, analysis and sharing across species, with potential benefits for both public health and animal health and welfare.

Any new database must be compatible with those used by other administrations in the UK, to aid movement of animals across the UK and the sharing of data. It could also be beneficial to consider compatibility with EU databases for the same reasons.

In our policy position on veterinary scanning surveillance<sup>13</sup>, we draw on examples of successful surveillance systems to highlight key factors at play. These include:

- a standardised method of data input.

- being easy to submit data, with a balance between the level of detail required and the associated increase in time and cost.

- Sharing of data is incentivised by enabling veterinary professionals, veterinary practices, animal keepers and laboratories to derive professional, economic, logistic and public relations value from inputting data, on top of the value derived for animal health and welfare

- sufficient connectivity and IT literacy amongst those inputting data.

- appropriate technology, and skills and expertise, to distil syndromic surveillance data from different sources.

- the importance of qualitative data being recognised and a mechanism for capturing this.

- Data collection includes consent for the anonymised sharing of data to allow for its wider use.

Any new national database should include these key points and replicate

*Thinking about the SFS:*

8. In terms of the future scheme, what are your views on the proposals to enable the data we collect on a farm to be used by farmers to track progress and demonstrate their sustainability credentials?

Please provide comments to support your view e.g. potential benefits and impacts.

In our policy position on veterinary scanning surveillance<sup>14</sup>, we draw on examples of successful surveillance systems to highlight key factors at play. One of these key factors is that submission and sharing of data should be incentivised by enabling veterinary professionals, veterinary practices, animal keepers and laboratories to derive professional, economic, logistic and public relations value from inputting data, on top of the value derived for animal health and welfare.

The proposals to enable the data collected to be used to track progress and demonstrate sustainability credentials could offer an incentive for farmers to share data.

We support efforts to assist producers and consumers to consider how well a production system holistically meets all of an animal's health and welfare needs. We therefore recommend that farmers are also able to use any tracking on the data provided to demonstrate their animal health and welfare credentials.

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<sup>14</sup> British Veterinary Association (2018), [Position on veterinary scanning surveillance \(animal health and disease monitoring\)](#)

*Thinking about regulatory compliance:*

9. What are your views on the proposals for improving the monitoring of regulatory compliance?

Please provide comments to support your view e.g. potential benefits and impacts.

This is not our area of expertise, but we support initiatives to improve compliance with baseline legislative requirements.

10. What do you think needs to be considered in future to enable regulators to effectively monitor regulations?

This is not our area of expertise

### **Forestry and woodland**

11. What are your views on the proposed amendments to forestry legislation?  
Please provide comments to support your view e.g. potential benefits and impacts.



It is not within our remit to comment on these proposals

## **Tenancies**

13.

It is not within our remit to comment on these proposals

14. Do you think there will be instances where landlords may require the same access to dispute resolution as described above?

Please provide additional evidence to support your view e.g. the extent to which this is a problem currently, the likely benefits and impacts.

It is not within our remit to comment on these proposals

It is not within our remit to comment on these proposals

## Animal Health and Welfare

16. What are your views on the proposals for additional powers for Welsh Ministers to:

- a) Establish Movement Control Zones to control the movement of animals, semen, embryos, animal products, animal by-products and/or other things that can spread infection e.g. equipment and utensils, in the event of a significant, new animal disease threat, where there is currently no or limited power to do this?
- b) Amend the current rigid traditional definitions to ensure animal disease control measures can be applied appropriately and flexibly to any species of kept animal where there is a potential disease risk?

Please provide comments to support your view e.g. potential benefits and impacts.

We support the proposals for additional powers to limit movement of animals and animal by-products in the event of a significant, new animal disease threat. We also support widening the definition of animal, since the species type is important when considering restrictions. For example, any restrictions on movement of pet animals would need to be conceived, communicated and enforced differently than those for livestock.

The extension of wider ranging generic control mechanisms would be useful when there is evidence of new threats, but the full epidemiological links between species may not yet be clear. Such restrictions should be subject to published assessment so that the agricultural industry can understand the need for such measures being taken. A power is currently available to apply movement restrictions on an area when there is a suspicion or threat of Foot and Mouth Disease, before the disease is confirmed. This proactive approach is beneficial in reducing the spread of disease while the situation is being investigated. Being able to extend control measures in a precautionary way gives great benefit to government and the industry to minimise the impact of a disease incursion. It does need to be used sensitively and with dissemination of the currently available evidence on which it is based. Widening the definition of animal should also aid the precautionary approach, but again relies on publication of the rationale.

In our bTB position, we recognise that one of the greatest threats to the health status of an established herd is through contact with cattle from outside of the herd. According to the study by Crispell et al. (2019)<sup>15</sup>, the majority of bTB transmission is



In some circumstances snaring may be used to control wildlife in view of economic and practical constraints. For example, wild species that threaten farmed animals, native animals or humans by killing for food or by spreading disease are sometimes controlled, but this must always be done as humanely as possible.

There are concerns regarding animals killed or injured rather than held by snares, and the percentage of non-target species sometimes caught in snares. The British Veterinary Zoological Society (BV

This is not our area of expertise

## **Welsh Language**

19. We would like to know your views on the effects that the White Paper proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. [page 18.82(o)-3( le)-3(ss)10( f)-3(a)6(vo)-3(u)-3(rab)-4(ly )] TJETQ77

BVA is aware of the Welsh language act and the importance of the Welsh language in Welsh communities, particularly in rural areas likely to be most affected by agricultural policy. Our high animal health and animal welfare standards rely on effective communication between farmers, their own vets and government vets, for example to enable effective disease surveillance to be carried out. Welsh language is an essential aspect of this communication and it is important for animal health and welfare that farmers in all parts of Wales are able to access schemes and veterinary services in their chosen first language.

BVA supports initiatives such as [Welsh4Vets](#), a scheme led by the Wales Veterinary Science Centre to offer the chance to learn or practice speaking in, and listening to, Welsh. We recognise that having a little bit of knowledge of conversational Welsh can help to integrate with clients and communities.

BVA also supports the new Aberystwyth School of Veterinary Science at Aberystwyth University, which will welcome its first students in September 2021, and will provide opportunities for students to study specific areas of veterinary science in Welsh.

20. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the 0 G[( )] TJETQq72.504 148.1 4

It is not within our remit to comment on this



countries of the UK, however coordination and oversight on matters of animal health and welfare is crucial. There will therefore need to be consideration where decisions