

their counterparts elsewhere in the UK. It has been estimated that EU subsidies make up between 50 and 60 per cent of farm income in the UK.¹ However, this provides 83 per cent of total farming income in Northern Ireland.² Therefore, a focus on productivity will be important for the future of Northern Ireland agriculture.

10.

presents an opportunity to modernise and optimise our animal health and disease monitoring networks which

region of origin. This can help secure opportunities for Northern Ireland farmers and open up new export opportunities.

22. We strongly support encouraging the public sector to buy Northern Ireland produce and championing the high standards of agriculture, by procuring farm assured produce. Government Buying Standards should be amended to reflect this. In addition, we would also welcome a government-led education campaign, supported by agricultural, animal health and welfare, and food stakeholders, to encourage all consumers, both public sector services and individual consumers, to buy farm assured produce, and understand the positive animal health and welfare, and environmental, impacts of doing so.

Areas where you perceive there are market failures that are preventing the sustainable development of the sector and that may require direct government intervention.

23. The Government should utilise public money to incentivise and support animal health and welfare outcomes as public goods. Public goods by their very nature, are not market goods in the same way as livestock products such as meat or milk. Public goods have no explicit value in terms of market prices and so the market cannot efficiently allocate resources to them. Other means therefore must be used – such as the intervention of Government in the form of regulation or financial support.¹¹
24. Incorporating animal health and welfare outcomes must be done in a meaningful way. An outcomes approach should be utilised as a tool to drive continuous improvement of animal management and husbandry practices, thereby promoting high animal health and welfare. The standardised assessment of health and welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct examination. Delivering these public goods should be at the heart of a new post Brexit agricultural policy- benefiting producers, consumers and wider society.

Processing capacity in Northern Ireland.

25. A full assessment of abattoir provision that can be accessed by farms in Northern Ireland would be

equipment to comply with these standards. This has led to some smaller premises closing due to financial pressures.

High-throughput abattoirs

27. A shift towards this model of abattoir provision can increase journey lengths to slaughter as the number of

compliances originating in slaughterhouses, transport and on-farm. It is important to note that during this time period the animal welfare non-compliances arising in slaughterhouses were substantially lower than those arising on farm and in transport. 5.9% of all level 3 and 4 non-compliances originated in the slaughterhouse compare to 66.4% originating from transport and 27.6% on-farm.²⁶

Figure 1: FSA data on animal welfare non-compliances per one million animals in different slaughterhouse size groups (Extracted from FSA Board Papers 19 September 2019, Animal Welfare Annex)

32. The data shown in Figure 1 demonstrates that per one million animals there was a statistically significant difference in level 3 (major) and 4 (critical) animal welfare non-compliances in low-throughput abattoirs compared to that in premises with a greater throughput. However, it is important to recognise this data only shows the number of level 3 and 4 animal welfare non-compliances per one million animals and does not show the proportion of level 3 and level 4 non-compliances. While this is data provides a useful comparison in relative terms, abattoirs with a larger throughput will have slaughtered a greater total number of animals over the April 2017-March 2019 period, meaning that they may have a greater total number of animal welfare non-compliances than smaller abattoirs.
33. We would therefore welcome the opportunity to work with the UK Governments, and the food processing industry to develop a voluntary industry standard for low throughput abattoirs to ensure compliance with legislative requirements for animal health and welfare, and support Food Business Operators (FBOs) in their efforts to safeguard food hygiene, safety and animal health and welfare.
- Mobile slaughter**
34. As Northern Ireland will remain within the scope of the EU Single Market, it will be implementing new EU regulations. This brings with it a new opportunity to slaughter on farm ("mobile slaughter" rather than "mobile abattoirs" that might offer new opportunities for primary producers).

Mobile abattoirs

²⁶ See Annex 4 'Data stories: Analysis of welfare trends for major and critical non-compliances in England and Wales', page 2 of Food Standards Agency (FSA), 2019. FSA Board Papers 19 September 2019, Animal Welfare Annex 8. Available at: <https://www.food.gov.uk/sites/default/files/media/document/fsa->

35. We also recognise that mobile abattoirs can provide opportunities to slaughter animals as close to the point of production as possible, in turn reducing the need for animals to be transported over longer distances.²⁷ We are therefore supportive of exploring options to provide more opportunities for farm animal slaughter as close to the point of production as possible. We note the Scottish Government has recently commissioned a study to determine whether or not mobile abattoirs would be viable in Scotland.²⁸
36. Mobile abattoirs must comply with current legislative requirements for animal health and welfare at slaughter, biosecurity and waste disposal, and

46. Vets are the trusted advisors to farmers and uniquely positioned to offer the advice that encourages the uptake of innovative approaches. There should be greater utilisation of behavioural approaches to encourage the application of the findings of innovative research into practice.
47. Vets recognise the role of new technologies and innovative methods in monitoring animal health and welfare outcomes, addressing animal health and welfare conditions and optimising the contribution of each animal to agriculture systems such as Precision Livestock Farming³⁴. Within a future post-CAP agriculture policy we would welcome the use of grants or pilot schemes to trial the use of innovative technologies to improve animal health and welfare.
48. This is an opportunity to exploit the existing ecosystem of organisations with an interest in encouraging the adoption of innovation, new farm management practices and technology transfer from the lab to the field. This includes organisations such as Further Education (FE) Colleges, CAFRE, Queens University

should work towards positive health outcomes, the five animal welfare needs³⁶ and adhere to OIE standards for animal health and welfare, offering stimulating living environments to allow for the performance of highly motivated behaviours; opportunities for positive welfare outcomes, such as comfort, pleasure, interest and confidence; and excellent health outcomes.³⁷ These five animal welfare needs are set out in the Welfare of Animals Act (Northern Ireland) 2011 as:

- The need for a suitable environment
- The need for a suitable diet
- The need to be able to exhibit normal behaviour patterns
- The need to be housed with, or apart from, other animals
- The need to be protected from pain, suffering, injury and disease

Sustainable resource management to protect and conserve species, habitats and biodiversity

53. As a health-centred profession and key stakeholder in the One Health agenda, we support the development of policies that address the use of natural resources, protection and conservation of wild species, habitats and biodiversity in order to better protect the environment which both humans and animals share and reduce the ecological footprint of animal agriculture as a whole. As highlighted by the Food and Agriculture Organization of the United Nations:
54. “If managed sustainably, agricultural sectors can contribute to important ecosystem functions. These include maintenance of water quality, nutrient cycling, soil formation and rehabilitation, erosion control, carbon sequestration, resilience, habitat provision for wild species, biological pest control and pollination.”³⁸

Innovative whole farm management systems

55. The use of innovative whole farm management systems that integrate the delivery of environmentally beneficial outcomes as well as high quality animal health and welfare food products is paramount to ensure environmentally sustainable agriculture. In terms of soil health, in 2010 the annual external cost to farmers from soil erosion and compaction from agriculture in England and Wales was estimated to be £305 million.³⁹ With this in mind, it is important to recognise the role livestock can play in optimising soil quality and productivity with whole farm management models that minimise environmental degradation and use resources and energy more efficiently.
56. Under certain circumstances and with the right conditions, inputs and attention to animal health and welfare, management options such as rotational grazing, incorporated within the context of whole farm management, can assist with restoration or improvement of soils and biodiversity.
57. Mob grazing or managed intensive rotational grazing (MIRG) for example is a form of rotational grazing whereby a high stock density is grazed in a paddock with short grazing periods and long rest periods.⁴⁰ This approach ensures that:

- Forage is harvested

³⁶ Animal Welfare Act 2006, Animal Health and Welfare (Scotland) Act 2006, Welfare of Animals Act (Northern Ireland) 2011

³⁷ Farm Animal Welfare Committee (FAWC), 2009. “Farm Animal Welfare in Great Britain: Past, Present and Future”. Available at: <https://www.gov.uk/government/publications/fawc-report-on-farm-animal-welfare-in-great-britain-past-present-and-future>

³⁸ FAO, 2017. Sustainable agriculture for biodiversity: Biodiversity for sustainable agriculture. Available at: <http://www.fao.org/3/a-i6602e.pdf>

³⁹ Defra, 2018. The Future Farming and Environment Evidence Compendium [pdf] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/683972/future-farming-environment-evidence.pdf

Soil erosion is minimised through rest periods to prevent livestock from continuously treading and compacting the same area

Manure is dispersed through hoof action, reducing fertilizer maintenance costs and mitigating against the environmental impact of some fertilizers

58. Veterinary input in the design of managed intensive rotational grazing systems is vital to ensure that provisions are in place across rotations to adequately meet ruminant and non-ruminant nutrient, water, shade and shelter requirements and maintain animal health.

Ī: i ĩ fY-ZġtĒubja U'ZYX

59. In addition, consideration should be given to enabling the sustainable production of animal feed that will be needed to support animal agriculture. With this in mind, there is a need to progress towards 'future-fit' animal feed⁴¹ that minimises competition for land with restorative and biodiversity practices, as well as minimising water use, pollution and overfishing. These aims should be achieved whilst maintaining the current high nutritional value of animal feed in order to continue to support animal health and welfare standards, as well as measures to protect food safety.

Vets supporting farming clients

60. The veterinary profession has a clear role to play in supporting their farming clients by advising on, developing and conducting further research into management systems and husbandry practices that work towards sustainable models of production. This is both in terms of positive animal health and welfare, public health and food safety, as well as the local environment and economic sustainability for producers.
61. This role includes taking an evidence-based approach to advising on the practical steps needed to improve existing systems such as building design, husbandry practices, biosecurity, the responsible use of medicines and disease prevention and control mechanisms. In addition, some members of the profession have the skills and capabilities required to fulfil an expert role in these areas on a national, as well as international, platform.
62. BVA is encouraging its members to provide leadership in this area, and we have developed a BVA sustainability and the veterinary profession action plan.⁴² Through this resource we are encouraging all veterinary surgeons to have a good knowledge of the contributions that the profession can make to the sustainable agriculture agenda; for example, at the levels of individuals (communicating directly to animal keepers and owners), communities (eg. veterinary practices serving as credible and informed animal welfare hubs) and nationally (eg. veterinary associations developing and advocating policy).

An evidence-based approach to considering net zero emissions

63. When considering how to achieve net zero emissions in Northern Ireland agriculture, it is important to accurately assess the global warming potential of different greenhouse gases produced by animal agriculture and develop policies to mitigate these emissions accordingly. Research by International Panel on Climate Change (IP

and welfare standards. However, the veterinary profession is facing a recruitment and retention crisis. With mounting efforts from a range of stakeholders to address workforce shortages, there is much debate about the role that education and increasing the number of vet students could play in tackling these concerns.⁵⁰

71. Increasing the number of veterinary students alone won't provide a holistic, long-term approach to making sure we have enough vets in the workforce to manage and treat the Northern Ireland

88. Free movement of people has had an enormous impact on our veterinary workforce. Any additional barriers to the movement of EU-qualified vets to the UK have significant consequences for animal health, animal welfare, public health, and trade.
89. In February 2020 the government set out its plans for a new immigration system. Free movement has now ended as has the automatic registration of EEA qualified vets by the Royal College of Veterinary Surgeons as part of the Mutual Recognition of Professional Qualifications (MRPQ). In place of free movement is an employer-led points-based system which is likely to place a significant administrative and financial burden on veterinary businesses who will be required to sponsor recruits from outside of the UK. This new immigration system casts significant doubt over whether the profession will be able to fill the workforce gap created by the end of free movement when we are already struggling to recruit and retain vets.

Retention of existing workforce

90. Considerable efforts are underway to retain graduates within the profession. Erosion of the veterinary workforce has been an ongoing concern for BVA, RCVS and Government, which predates the decision of the UK to leave the EU.

production/marketing, VAT and excise for goods and state aid. This is to avoid a hard border. The European Commission's Q and A⁵⁴ says:

Northern Ireland will continue to apply the Union's Customs Code and will remain aligned to those rules of the Single Market in order to avoid a hard border on the island of Ireland.

The necessary checks and controls will take place on goods entering Northern Ireland from the rest of the UK, including, for example, Border Inspection Posts to ensure that the necessary sanitary and phytosanitary ("SPS") controls are carried out.

UK authorities will implement and apply the provisions of Union law that the Protocol makes applicable in the UK in respect of Northern Ireland. Therefore, all checks will be carried out by UK authorities with appropriate supervisory and enforcement mechanisms for the EU.

97. The Northern Ireland Protocol gives the joint committee specific responsibility for certain aspects relevant to the trade in live animals and products of animal origin. This includes determining the practical arrangements for EU supervision of UK implementation and enforcement of specific aspects of the Protocol, as well as review the implications of the Protocol for the UK internal market, and north-south co-operation. Should the NI institutions reject the provisions in the Protocol the joint committee will make recommendations to the UK and the EU.
98. The joint committee will also determine the criteria according to which goods moving from Great Britain to NI will be considered not "at risk" of subsequently moving into the EU, and therefore will not be subject to EU customs duties. Note this responsibility refers only to customs duties, and not regulatory or SPS checks.
99. While there may be some scope of the joint committee to consider approaches, which may limit the need for Export Health Certification documents or veterinary checks for goods entering Northern Ireland from Great Britain, it would appear this scope is much narrower than that open to customs issues.
100. Article 6(1) on "protection of the UK internal market" provides that the Protocol shall not prevent "unfettered market access for goods" moving from Northern Ireland to Great Britain. It sets out that there

