

**Submission to the
Department of Agriculture, Food and the Marine
(DAFM)**

**Prepared by
Animal and Plant Health Association Ltd (APHA)**

**On
National Farmed Animal Health Strategy
Consultation Document of 28 Sept 2016**

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The greatness of a nation can be judged by the way its **animals** are treated. - **Mahatma Gandhi** -

The Animal and Plant Health Association (APHA) welcome the opportunity to make a submission to the National Farmed Animal Health consultation document. APHA understands that this stage of the consultation is on a general basis with more detailed and in depth consultation on appropriate and short listed issues at a later stage.

APHA represents the manufacturing companies of both veterinary medicinal products and pesticides in Ireland. Whilst, APHA members are commercial companies, we are consistently focused on the long term viability and sustainability of farmers in Ireland. Ireland has commenced a number of excellent initiatives in the past few years on animal health programs with specific targeted outcomes and milestones. These include the formation of Animal Health Ireland and the Dairy, Beef, Sheep, Pig and Poultry Assurance schemes operated by Bord Bia.

We fully support that agricultural output in Ireland is primarily animal livestock based, and that the main determinants of continued productivity in these sectors will be dependent on future developments and improvements in the targeted areas of;

- Breeding/genetics
- Nutrition
- Operator husbandry and Management skills
- Animal Health

In light of Food Harvest 2020, Foodwise 2025 and targeted objectives in the livestock sector and the long term sustainable aims for quality food production, we in APHA believe that like-minded organisations should work in a more coordinated approach to responsible use of medicines in animals. This has been demonstrated to work efficiently within the structure of Animal Health Ireland (AHI), as referred to throughout the consultation document.

Ireland as a world class livestock producer of quality food **AND** a world class food producer/processor needs to be recognized as an open, transparent producer of quality premium food, as demanded by its customers. Food is always judged on its last good taste that leaves a positive impression on the consumer.

This is driven by various issues, concerns and requirements both legislative and good practice, but in the main are been driven by a more discerning, focused consumer where information is available on issues of concern at the touch of a button.

Whilst it is correct that DAFM will target all four pillars with support from specialized agencies and knowledge groups, we in APHA feel we can offer assistance in the development of a focused “Animal Health” strategy that can be further developed to progress this initiative.

APHA can draw on a significant wealth of knowledge and experience from within the veterinary expertise membership that represents the main R&D veterinary manufacturing companies worldwide, but with local knowledge and a commitment to developing Irish agriculture.

The animal medicine manufacturing industry, has an established track record in working partnerships, acknowledging roles and responsibilities whilst applying the principle of “prevention is better than cure”. The European Platform for Responsible use of Medicine in Animals (EPRUMA), was established in 2005, to ensure best practice through responsible use of veterinary medicines in the prevention and control of animal diseases.

EPRUMA works to promote the responsible use of medicines in animals in the EU in order to maintain efficacy and both prevent and minimize undesirable effects. Other European countries have followed and developed similar strategies adapted to their markets and farming practices, these include UK, Spain, and Belgium.

National issues and education on responsible use of medicines in animals requires a coordinated cross functional approach and the support of all organisations delivering agreed messages and been seen to actively support good management practices in all aspects of animal health. The AHI structure, operation and targeted key performance indicators is an excellent model that could be used as a template or possibly have its remit broadened to not just include “Animal Health” but also work with Teagasc, Veterinary Ireland, APHA, ICOS, the meat industry and farmer organisations to promote “Operator husbandry and Management skills”

These include education on antimicrobial resistance (including the why should I be concerned), anthelmintic resistance, use of antibiotic dry cow therapy. Such knowledge is not in the exclusive domain of any one organisation, but rather the driving principle of working together to achieve a common overarching but national objective. This could also be included as a major part of an Ireland “One Health “strategy.

With this in mind we respectfully submit the following proposal for consideration;

This is an outline proposal, leading to the formation of a RUMA Ireland Initiative and Draft Founding/Funding Discussion Document. Responsible Use of Medicines in Animals (RUMA) is used only as Draft name in the following draft outline discussion document. We have already taken the liberty to register a domain name www.ruma.ie, if one was required at a future date by any organization.

Terms of Reference-

Name

RUMA Ireland (Responsible Use of Medicines in Animals). Linked to EPRUMA is the European Platform for the Responsible Use of Medicines in Animals.

It is to be a **multi-stakeholder platform** linking best practice with animal health and public health.

Main goal

RUMA Ireland- would seek to support and follow the European goals with a similar structure supported by relevant like minded stakeholders in Ireland.

EPRUMA, (established in 2005) works to promote the Responsible Use of medicines in animals in the EU ('medicines' as defined in Directive 2001/82/EC as amended by Directive 2004/28/EC) in order to maintain efficacy and both prevent and minimise undesired effects.

Proposed Objectives.

- **Promoting** animal health and welfare as well as human health through the Responsible Use of veterinary medicines;
- **Developing** best-practice frameworks concerning the use of veterinary medicines. RUMA would work on broad principles with stakeholders in Ireland and also work with European agencies to develop best practice in the use of veterinary medicines in Ireland (An example is the "Best practice framework for the use of antimicrobials in food-producing animals", which EPRUMA launched in 2008 and is available in various European languages.);
- **Communicating** with and **engaging** all parties concerned with the Responsible Use of veterinary medicines.

What would be RUMA's aims?

The main aims of RUMA are to:-

- (a) Identify issues of scientific and public concern in the areas of public health, animal health, animal welfare and the environment which relate to animal medicine use.
- (b) Provide an informed consensus view on identified issues, developed by discussion and consultation.
- (c) Establish and communicate guidelines which describe "best practice" in the use of animal medicines.
- (d) Advise industry on the implementation of "best practice", especially in the development of codes of practice and assurance schemes.
- (e) Communicate and consult on:
 - (i) The effective use of animal medicines.
 - (ii) The regulation of livestock production and use of animal medicines.
- (f) Promote the appropriate use of authorised medicines for disease prevention and control.
- (g) Liaise with National Authorities, including DAFM, HPRA, AHI and FSAI.
- (h) Identify practical strategies to sustain the responsible use of medicines.

Activities

RUMA partners carry out their activities in accordance with the platform's main goal and objectives:

- **Promoting** coordination and synergy between EU-wide and national initiatives to optimise the Responsible Use of veterinary medicines by supporting the production of relevant material, e.g. best-practice documents, and encouraging the training of key stakeholders;
- **Communicating** about RUMA and other relevant initiatives regarding the Responsible Use of veterinary medicines to key stakeholders at meetings, various media and on the Internet.
- **Engaging** with key Irish and European decision makers on ways to optimise the Responsible Use of veterinary medicines; and with Irish and European stakeholders working in animal health, animal welfare and the food chain to increase understanding of the benefits of Responsible Use for animal health and public health;
- **Monitoring** European and national activities regarding the use of animal health products and EU-wide training schemes through which Responsible Use could be promoted among veterinarians, farmers and other relevant stakeholders.

Membership

RUMA pursues its goal by facilitating and promoting a **co-ordinated and integrated approach**, involving key stakeholders, including but not limited to;

- veterinarians;
- farmers and agri-cooperatives;
- manufacturers of animal medicines and diagnostics;
- feed manufacturers;
- professionals working in animal health, sanitary security and sustainable agriculture;
- pharmacists; and
- Others such as institutions, food processing industry, retailers, consumer organisations, etc.

Following exploratory meetings in 2013/2014 with a broad invitee spectrum across relevant potential partners the following is an outline of the present levels of support;

Proposed stakeholders;

APHA. - Animal and Plant Health Association, representing Manufactures and Distributors.

ICOS. - Irish Co-operative Organisation Society, Representing Agricultural co-operatives and Marts.

Veterinary Ireland. - Representing the veterinary profession.

Irish Pharmacy Union/Irish Pharmacy Society - Representing veterinary pharmacist's retailers.

Bord Bia. - Marketing of Irish Livestock produce and registers of Bord Bia Quality Assurance

IFA, ICMSA, ICSA- Representing livestock farmers.

IGFA. - Irish Grain and Feed Association. Representing grain and feed manufacturers.

And further agencies/organisations are supportive in kind, providing knowledge, expertise and facilities.

HPRA –Health Products Regulatory Agency.

AHI. - Animal Health Ireland.

Teagasc- Farm Advisory Agency

FSAI. - Food Safety Authority of Ireland.

DAFM.-Department of Agriculture, Food and Marine

UCD. - University College Dublin- Public Health and Veterinary Science.

VCI. - Veterinary Council of Ireland.

For comparison purposes; the associations listed below are the founding members of EPRUMA for Europe;-

- **COPA-COGECA:** European Farmers and Agri-Cooperatives;
- **EISA:** European Initiative for Sustainable Development in Agriculture;
- **EMVD:** European Manufacturers of Veterinary Diagnostics;
- **FEFAC:** European Feed Manufacturers Federation;
- **FECAVA:** Federation of European Companion Animal Veterinary Associations;
- **FESASS:** European Federation for Animal Health and Sanitary Security;
- **FVE:** Federation of Veterinarians of Europe;
- **IFAH-Europe:** International Federation for Animal Health-Europe;
- **PGEU:** Pharmaceutical Group of the European Union.

Rights and obligations of partners

Partners are committed to **work together** to ensure safe and transparent use of veterinary medicines and to prevent or minimise undesired effects.

Bearing in mind we are an island export nation that gives us tremendous advantages in animal health protection in our isolation, there would be an important role for the inclusion of Northern Ireland in an all island approach.

The targeted outcomes of achievement for 2021 are realistic but we need to action promptly.

APHA welcomes this initiative and offers its full support to the work in partnership with whatever body/structure is deemed best to drive forward to achieve the document goals and objectives.