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**To:** NFAHW  
**Subject:** Comments on the NFAH strategy from Dr Michael Gunn

## COMMENTS ON THE NATIONAL FARMED ANIMAL HEALTH STRATEGY CONSULTATION DOCUMENT

**Dr Michael Gunn**

I welcome it and believe that the Strategic Actions outlined within the document should be pursued. Although the proposed strategy is weak in some areas I believe that if the strategic actions are modified appropriately and pursued successfully a new dynamic for farmed animal health could be achieved.

### **GENERAL COMMENTS**

Although the title refers to Animal Health, it is not clear in some sections if this is an Animal Health strategy or an Animal Health and Welfare Strategy.

The role of poor health as a contributor to poor animal welfare and the disproportionate contribution of ill animals to greenhouse gas emissions should be clearly enunciated as a reason to have high health standards for farmed animals.

The general environment that is impacted by animal farming also needs to be referred to – such as the possible effects on biodiversity and water quality associated with pressures from animal farming and their possible implications for human well-being.

The text in many diagrams is difficult to read due to poor text or background colour combinations.

Regarding the section - Reflecting Costs and Benefits. The concept that farmed animal owners need to take ownership of their responsibilities for both endemic and possibly exotic diseases in their animals should be pursued. Financial support measures for disease control, based on risk based assessments of contributions from farmers, assessed per head, of differing ages species etc., should be instigated. Examples of such systems occur in a number of EU MS.

Page 28 line 65 -67. In order to have farmer “buy in” it would be useful to clarify that owner’s representatives (preferably not political farming bodies) should be involved in decision making regarding the management of disease control related funding.

Chapter 4 c. Laboratory Services. The role of Farmers, Private Veterinary Practitioners and more particularly the National Veterinary Laboratory Service are given scant attention in this proposed strategy to deal with farmed animal health. Animal ill-health starts in animals. National disease control measures need information derived from a national perspective, as decisions on animal health should be based on factual knowledge. It is apparent that there is increasing reliance on the private sector laboratories to provide such information in the Animal Health area. Such laboratories confine themselves to financially lucrative areas associated with animal health and have limited “real” scanning surveillance value, as their goals are financial.

A properly resourced Veterinary Laboratory service is needed in Ireland. This has never been the case and can be clearly demonstrated by the following comparisons. There are approximately 100 staff work in the Irish Equine Centre which deals with a large proportion of the national herd of 250,000 horses. On a pro-rata basis, in order to service 6.7 ml cattle alone, a number closer to 1,000 staff (i.e. a scale far greater than the reality) would be needed in DAFM laboratories! Another comparison is that, for years in the equivalent Northern Ireland Veterinary Laboratories there have been approximately three times as many laboratory staff to deal with 6 counties as there are in Ireland to deal with 26 counties! The figures speak for themselves and the reality is that the Veterinary

Laboratory service has always been under-resourced, but unfortunately not recognised as such. Apart from early detection of disease and investigation of patterns of the same, the DAFM Laboratory Service is needed to act as national laboratories to facilitate trade, produce/check diagnostic reagents used for disease control schemes, produce test standards, carry out controlled investigations as appropriate on applied issues directly related to the health of Ireland's 24ml farmed animals etc. etc. The importance of the credibility of the national laboratory service to foreign trade delegations cannot be overestimated. The control of Foot and Mouth Disease in sheep in the Cooley Peninsula and detection of dioxins in pig tissues had an extremely large element of good fortune and luck associated with both events. A properly resourced laboratory service to detect and deal with such issues rather than a reliance on chance should be the aim for the future.

If this Proposed Strategy is to be taken seriously, an effectively resourced active surveillance system (with a laboratory service at its core), and widespread sharing of the information from the same, as carried out by Animal Health Australia, is needed.

### **SOME SPECIFIC COMMENTS**

Page 5 Section B Lines 6-9 Operator husbandry and management should be first on the list. It is generally accepted that poor management will greatly reduce any positive effects of genetics and nutrition

Page 8 Line 16 remove .... anthelmintics and .....

Page 12 The Delphi Study carried out by AHI on disease priorities should be referred to.

Page 16 Pt 2 lines 12 -13 why not refer to animal welfare implications here; e.g. Sub-optimal animal health and associated poor welfare - a significant impediment ....

Page 21 Line 31 Add:- It relies heavily on the scientific advice of volunteer experts in their field. It has its own organisational structure and processes.

Page 22 Lines 73-4 Suggest refer to Farmer Discussion Groups here?

Page 30 Lines 22 to 25 The issue of antimicrobials used for growth promotion should be referred to here.

Page 31 Lines 45 to 49. Suggest insert - AHI has also produced general information on Johne's disease, Parasites and IBR and direct information to specific farmers through the Beef Health Check Programme.

Page 32 Line 92 Surely it should be ..... sufficiently controlled .....rather than ..... sufficiently available....

Page 34 – The figure needs to be made easier to read.

Page 36 line 36 If the objective is Animal Health Surveillance the importance of Veterinary Scientists should precede economists and epidemiologists – collection of data on animal disease and identification of disease patterns should be a priority.

Page 38 Lines 41 to 45. The desirability of regular/increased numbers of simulation exercises and resources for the same should be referred to here.

Pages 40 – 42. If the UK leaves the EU Ireland will be bordered by a "third country" which can be argued, will increase risks to animal health in Ireland, associated with the UKs proposed trading plans and their buffering function for Ireland from mainland Europe. The adoption of a "Fortress Ireland" approach will be necessary with a dynamic Veterinary Laboratory Service at its core. The increased risk of vector borne diseases associated with developing changes in climatic conditions should also be prioritised in this section.

Page 44 Lines 42-44 Why not consider making CVERA effectively part of DAFM?. This could result in all requirements for its expertise being available to other interests of DAFM as well as those of ERAD. It will need to be resourced appropriately to ensure adaptability and flexibility

Page 49 Line 39-42 and 48 and 49. Are the activities of paraprofessionals not more related to animal welfare issues or is this a potential reference to lay people being allowed to use medicines that are strictly controlled in other EU MS.

Page 59 Line 110. If AMR is to be taken seriously surely the word ... availability ..... should be replaced by ..... control..... if the build-up of antimicrobial resistance is to be taken seriously.