

28<sup>th</sup> October 2016

Mr Michael Creed TD  
Minister for Agriculture, Food & the Marine  
Department of Agriculture, Food & the Marine  
Agriculture House  
Kildare Street  
Dublin 2

**Re: IFA Submission to the National Farmed Animal Health Strategy Consultation**

Dear Minister,

The development of a framework for collective action by stakeholders in a National Farmed Animal Health Strategy is welcome and necessary.

IFA look forward to engaging proactively at the highest level in the decision-making process to represent the views of farmers, who are the key stakeholders. Farmers will be impacted directly in terms of the structure, direction and costs associated with the strategy you propose to develop for farmed animals.

In the first instance, and in order to ensure the meaningful involvement in a collective approach of farmers, the shortcomings identified in previous structures must be addressed and cannot be replicated in the approach envisaged for the National Farmed Animal Health Strategy.

Democratically elected farmer representatives must be key members of all decision-making bodies envisaged in the development of the strategy, including the 'Farmed Animal Health Strategy Review Body'.

To achieve this, and in advance of developing the 'National Farmed Animal Health Strategy', clarity in relation to roles and responsibilities of stakeholders must be provided. This must be used to identify the relevant key decision-making stakeholders. It is not appropriate that service providers have a direct role in regard to the direction and framework of the strategy. Membership of all decision-making bodies must only be drawn from the stakeholders who will be directly impacted by and contribute financially to the outcomes of the strategy direction. Clearly it would be anticipated that all service providers as stakeholders and beneficiaries of farming would be provided with the opportunity to have input of a technical nature relating directly to their support role in the strategy.

Currently, farmers and the State are the sole direct financiers of animal health in relation to farmed animals, with farmers exposed disproportionately to all of the costs involved.

In order for the development of a 'National Farmed Animal Health Strategy' to provide a meaningful consultation and inclusive decision making structure, it must be approached in the manner outlined above.

To fully acknowledge the accepted value of farmers and farming to the infrastructure of the country and its economy in this process IFA is seeking the following:

1. The membership of all decision-making bodies should consist only of direct financiers of farmed animal health, which are currently farmers and the State.
2. The accepted professional expertise of farmers must be fully recognised and form the basis for developing a cost-effective framework, keeping the roles of service providers to a minimum.
3. Prior to advancing discussions on the details of the framework principles published, a fair and equitable cost distribution model must be developed to address the huge imbalance that currently exists in relation to animal health costs for farmers.
4. A modelling resource, must be developed, which clearly identifies costs, timeframes and the impact of proposals on farms to feed into the decision-making process from the outset. This is critical to avoid the issues, which have arisen for farmers in current programmes such as BVD and Johnes, and extends also to statutory programmes implemented by your department.
5. Reliable, safe and non-commercial diagnostic/investigative tools must be a central plank of the strategy. The availability of competitively priced veterinary medicine products is a critical tool for farmers in protecting the health and welfare of their animals. To achieve this, the single EU market and the supply routes that provide maximum competition are crucial.
6. A National Farmed Animal Health Strategy cannot ignore the role wildlife play in jeopardising the health of our animals. A strategy focused solely on controls at farm level will not achieve the desired objectives as farmers have found to their cost. The Strategy must involve resourced and managed programmes for wildlife, protected or otherwise in conjunction with on-farm controls.

We look forward to engaging directly with you in the first instance to establish the membership of the decision-making bodies for the strategy, which in turn will provide the basis for focused discussion on the key elements in the order identified.

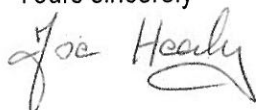
The proposed strategy is intended to cover all farmed animals and aquaculture, incorporating issues such as environmental impact and animal feed. This will require detailed discussion and impact analysis on a sector specific basis. It will not be reasonable to assume a one size fits all approach will address the complexities and differences in relation to the health threats and/or the practical implementation of controls across all sectors.

Anticipating the structures of the envisaged bodies will reflect the roles and responsibilities of stakeholders, IFA looks forward to proactive engagement with you and your officials in developing the 'National Farmed Animal Health Strategy' and correcting the current imbalance in relation to costs and responsibilities that exist for farmers.

IFA's democratically elected officers and professional staff will engage proactively in the decision-making forums with you and your officials across this wide range of complex areas to ensure the 'National Farmed Animal Health Strategy' meets the requirements of farmers.

We would welcome the opportunity to meet and commence discussions with you and your officials on this very important issue for all farmers.

Yours sincerely



**Joe Healy**

**c.c.** Martin Blake, Chief Veterinary Officer  
Dermot Murphy, Principal Officer  
Submission to the Public Consultation on the new National Farmed Animal Health Strategy  
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