



Ireland's Expanding Agri-food Industry requires a Modern, Progressive, Resourced Farm Animal Veterinary Service in order to Realise its Maximum Potential whilst Protecting Public Health, Animal Welfare and the Environment.

## **Strategic Animal Health 2025**

# **Veterinary Ireland Submission to the National Farmed Animal Health Strategy**

Food Animal National Committee

---

## **Contents**

### 1.0 Introduction

1.1 Climate Change and Agriculture

1.2 Antimicrobial Resistance

1.3 Animal Welfare

### 2.0 Priorities Identified in the National Farmed Animal Health Strategy

2.1 The Vision Statement

2.2 The Stated Strategic Outcomes

### 3.0 Animal Health Strategy Framework – Key Enabling Principles

3.1 Working in Partnership

3.2 Acknowledging Roles and Responsibilities

3.3 Reflecting Costs and Benefits

3.4 “Prevention is Better than Cure”

### 4.0 Supporting Infrastructure & Systems

4.1 Farm Animal Veterinary Services

4.2 Surveillance

4.3 Contingency Preparedness & Emergency Response

4.4 Traceability & ICT Systems

4.5 Veterinary Medicinal Products

4.6 Independent Scientific Advice

### 5.0 Summary of Recommendations

5.1 Working in Partnership

5.2 Data Sharing

5.3 Veterinary Medicinal Products

5.4 Knowledge Transfer & PVP-delivered Training

5.5 Contingency Preparedness, Emergency Planning & Surveillance

5.6 Traceability

5.7 Veterinary Practice Structure & CVE

### 6.0 Conclusion

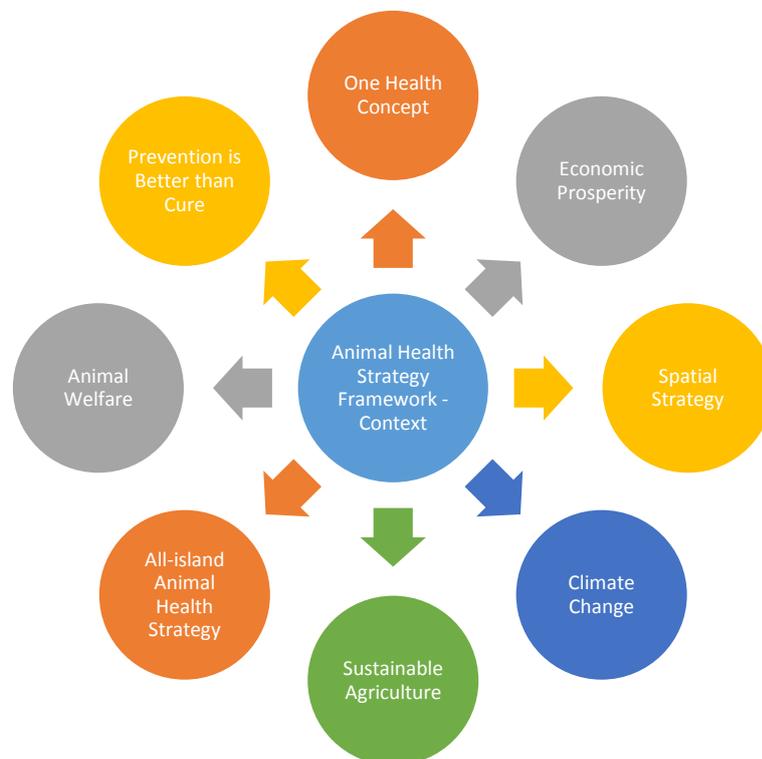
## **1.0 Introduction**

Veterinary Ireland welcomes the opportunity to make a submission on the proposed National Farmed Animal Health Strategy. The document, being very detailed and comprehensive, encapsulates the strengths and weaknesses of the Irish agri-food industry whilst seeking to exploit the opportunities that exist for safe, quality food in the global marketplace. The fact that the Irish agri-food industry contributes €26bn to the Irish economy and sources 74% of its resources and services from Irish suppliers, readily explains its significant contribution to Ireland’s economic recovery. As the industry is 80% animal based the document rightly concentrates its focus on the four main drivers of output

- Breeding & genetics
- Nutrition
- Operator husbandry / management skills
- Animal health

Veterinary Ireland considers that Private Veterinary Practitioners (PVPs) have a contribution to make in each of these four pillars of agricultural output.

Ireland has an international reputation as a food producing nation with a high animal health status. This reputation needs to be backed up with evidence to maximise the market opportunities for Irish produce. The global societal issues of climate change, antimicrobial resistance (AMR) and animal welfare also need to be addressed to ensure that the Irish agri-food industry remains sustainable and resource efficient into the future. The strategy outlined in the document and illustrated below is to be welcomed.



**Figure 1: Animal Health Strategy - Framework Context**

## 1.1 Climate Change and Agriculture

In previous submissions to Food Harvest 2020 and our submission to the Rural Development Plan 2015-2020 entitled “Sustainable Animal Health”, Veterinary Ireland has outlined that production losses within agricultural systems caused by disease (clinical and subclinical) and infertility increase the CO<sub>2</sub> emissions for every kilo of meat and milk produced. Disease, infertility and mortality result in under or sub-productive animals all of which continue to release GHG into the atmosphere. Our traceability systems indicate that approximately 11% of calves die before one month of age and that this figure is likely to be underestimated. Reporting of abortions is estimated as <10%. Recent research into mortality on sheep farms indicate higher levels of mortality than previously estimated. Calving intervals in Ireland are on average approximately 400 days indicating losses of 10%. This figure is masked by high levels of culling for infertility in many of our dairy herds. The use of Non Return Rate (NRR) as a fertility indicator by ICBF is often an inaccurate marker due to the use of sweeper bulls in the dairy herd whose services are not recorded. Veterinary Ireland believes that significant gains can be made in these areas which would result in increased farm production and subsequent revenue as well as reducing the carbon footprint per kilo of farm produce. The document correctly states that suboptimal performance on farms cannot be carried into the future.

## 1.2 Antimicrobial Resistance (AMR)

AMR has been identified as a global public health threat. Agriculture has come under the spotlight as many of the antimicrobial substances used in animals are shared in human medicine. It is an undesirable fact that in many farm systems antimicrobials are used as either a preventative health measure or as a direct result of sub-optimal husbandry or management and inadequate farm biosecurity. Behaviour change in relation to the use of antimicrobials on farm is required in advance of reduced availability or withdrawal of certain classes of medicinal products. Such change in behaviour is only brought about through a range of measures which include education, farm specific risk assessment to reduce levels of disease and enhance biosecurity and appropriate legislative changes to reduce the availability of antimicrobials on farm which can be used inappropriately or without professional advice.

## 1.3 Animal Welfare

Animals are sentient beings and keepers have a responsibility to ensure the welfare standards of animals kept on farms is in line with acceptable norms. Animal health and welfare are inextricably linked and a national strategy to improve the health of farmed animals will by extension deliver higher animal welfare outcomes on Irish farms. Expansion of herds, issues with calf health, poor weather and price volatility all result in threats to animal health and welfare.

## **2.0 Priorities in the National Farmed Animal Health Strategy**

### **2.1 The Vision Statement**

The vision statement of the document is outlined below;

*“Improved standards of farmed animal health contributing to a vibrant progressive and sustainable farming and agri-industry and to Irish society in respect of public health, animal welfare, the environment and the economy”*

This vision encapsulates a situation where

2.1.1. Ireland’s national farmed animal health status and associated surveillance and control systems are such that we can trade our animals and animal products into markets in all corners of the world.

2.1.2. Sub-optimal animal health - a significant impediment to farm and processor productivity – is no longer an accepted ‘norm’.

2.1.3. Farmed animal health standards reflect contemporary scientific knowledge and meet societal expectations.

2.1.4. Consumers and corporate customers value the confidence they have in the safety and wholesomeness of food and ingredients produced in Ireland – built on transparency, traceability, surveillance, contingency responses, animal health programmes and controls.

2.1.5. Consumers and corporate customers view Irish farmed animal production systems as among the best in the world.

2.1.6. Exotic disease risks are foreseen and mitigated and all disease emergencies are dealt with swiftly and effectively.

2.1.7. The costs of livestock health programmes and disease response efforts are appropriately balanced between industry stakeholders and the taxpayer.

2.1.8. Delivery of agreed animal health programmes are supported through the proactive leadership of all stakeholders.

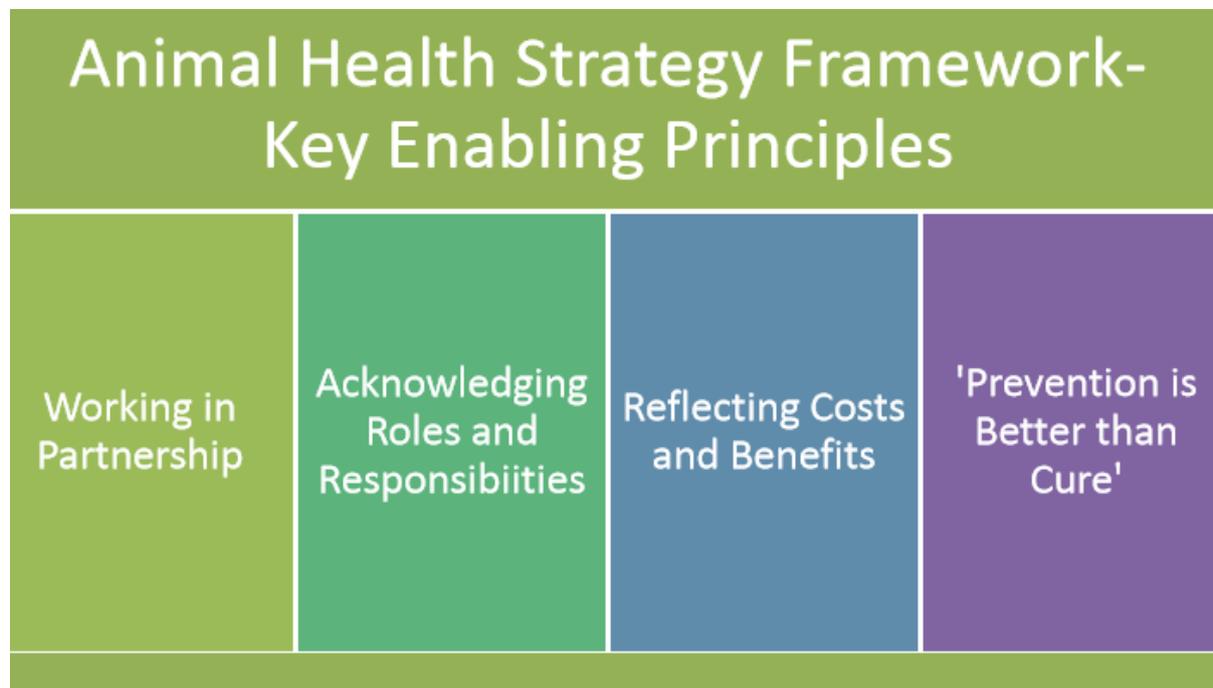
### **2.2 The Stated Strategic Outcomes**

The stated strategic outcomes of the vision outlined above are

- Increased farm productivity delivered sustainably
- Better processor outcomes
- Improved market access
- Improved capacity to protect public health
- Risk mitigation

### **3.0 Animal Health Strategy Framework – Key Enabling Principles**

The document proposed that these strategic outcomes are realised using the four key principles



#### **3.1 Working in Partnership**

Veterinary Ireland has a long track record of working in partnership with outside organisations and DAFM. Veterinary Ireland has provided representatives for numerous committees including AHI, the Antimicrobial Resistance Consultative working group, Farm Animal Welfare Advisory Council (FAWAC), Federation of Veterinarians in Europe (FVE) and the Conjoint Committee.

We are a committed stakeholder of Animal Health Ireland (AHI) committing funding and scientific expertise to Technical Working Groups (TWGs) since its foundation. Our representatives on the various implementation groups have made significant contributions to the success of AHI programmes by putting public good and professional scientific assessment above any vested interests.

The ability of PVPs to work in partnership can be readily exemplified by the success of the CellCheck programme. CellCheck workshops deliver training to farmers on best practice in the reduction of somatic cell counts on dairy farms and are delivered by multidisciplinary teams including PVPs, Co-op milk advisors, agricultural advisors and milking machine technicians.

PVPs have demonstrated a willingness to embrace new concepts and technologies and we have had over 50% of large animal PVPs attend training days to enable AHI and DAFM schemes to be delivered successfully. Examples include VRAMP training for the Johne's Disease control programme, BVD investigations training under the TASAH programme and more recently Knowledge Transfer training which was delivered by DAFM in partnership with Veterinary Ireland.

## **Recommendations**

The proposed recommended strategic actions can deliver the outlined objectives. Veterinary Ireland recommends that

- Farmed Animal Health Strategy Review Body has adequate representation from the practicing veterinary profession
- Focus groups be set up including PVPs to assist with strategic planning
- Further areas of collaboration between PVPs and DAFM are explored for mutual benefit

### 3.2 Roles and Responsibilities

While Veterinary Ireland recognises that farmers have ultimate responsibility for the health and welfare of animals under their care, the issues of contagious disease and zoonotic risk to public health as well as societal concerns regarding AMR and animal welfare indicate a need for management of these issues inside the farm gate. The position that Veterinary Ireland has long held is that PVPs are the gatekeepers of animal health and welfare and the link created with the nomination of a vet on the ER1 (for dairy, beef, sheep and pig farms) makes this link real and not nominal.

The document states that Government rationale for involvement in animal health should be guided by the underlying principles that its interventions are directed towards societally-orientated strategic outcomes, which are of a 'public good' nature and which include

- the protection of public health,
- the protection of the environment,
- the protection of the wider economy, which may include taking action relating to bio-security protection at external borders,
- the mobilisation of concerted action on the part of individual private stakeholders towards addressing animal health and welfare challenges, where the private sector does not have the infrastructure, systems or ability to compel participation to do so, and where such actions are of broader societal benefit,
- improving market access,
- safe-guarding animal welfare

## **Recommendations**

Strengthening the links between farms and their nominated veterinary practice will deliver improved outcomes on many of the strategic objectives outlined in the document.

Improved data flow between the farms and their nominated veterinary practices would result in better disease surveillance outcomes as well as enabling flags indicative of poor animal welfare. The ability of local veterinary practices to resolve such issues quickly cannot be underestimated.

### 3.3 Costs and Benefits

Veterinary Ireland reiterates the view that animal health programmes must have clear objectives and are adequately funded. The example of the Johne's VRAMP on Irish dairy farms is an example of where targeted use of funding delivers improved outcomes. A survey carried out by AHI showed that 93% of dairy farmers in the programme were very satisfied with both the scientific knowledge and advice of the trained PVPs and also with the practical recommendations made.

The TASAH programme as part of the Rural Development Plan is another example of funding being targeted where a specific need has been identified to deliver maximum value for expenditure.

### 3.4 Prevention is Better than Cure

The points made in the document on this subject are all echoed by Veterinary Ireland. Herd health planning is something that Veterinary Ireland has encouraged since its inception in 2001. Training modules on Herd Health Planning and the provision of high level CVE through our education committee, the Cattle Association of Veterinary Ireland (CAVI) has been a feature of Veterinary Ireland's identity.

The more modern approach of on-farm risk assessment and delivery of farm specific recommendations by trained PVPs has proven infinitely more successful than generation of generic herd health plans which are rarely read by farmers. This model has been proven successful in the delivery of the Johne's VRAMPs as well as BVD epidemiological investigations under the TASAH. Knowledge Transfer is about to be rolled out with well in excess of 500 PVPs of the population of 900 PVPs involved in large animal practice attending training.

### **Recommendations**

The strategic actions are noted and we would like to offer some additional suggestions

- Farmer education by PVPs is recommended by Veterinary Ireland. The PVP-delivered knowledge transfer meetings being delivered at present are proving very successful. Farmers have a genuine need for such training to reduce the use of prophylactic antimicrobial use as a management tool, to increase awareness of the concept of biosecurity and to consider prevention strategies on their own farms.
- Farmers should have compulsory training workshops on the sustainable and safe use of antimicrobial products. These workshops can be developed by DAFM in partnership with Veterinary Ireland and delivered to groups which will facilitate behaviour change in this area.
- Funding should be made available to facilitate on farm risk assessments on farm biosecurity by trained PVPs.

## 4.0 Supporting Infrastructure & Systems

The delivery of an effective and dynamic national farmed animal health strategy is dependent on the availability of a variety of nationally available infrastructural resources, operational systems and skill sets. If the provision of these infrastructural components is purposefully managed and coordinated, they will ensure the maximum outputs towards delivering the strategic outcomes – for the benefit of the various sectors of the agri-industries and for Irish society.

Figure 2: Supporting Infrastructure & Systems.



#### 4.1 Farm Animal Veterinary Services

Farm animal veterinary services in the State are provided by approximately 950 PVPs. This cohort of PVPs predominantly operate in mixed veterinary practices which are approximately 450 in number. The mixed veterinary practice also attends to companion animals and some also provide services to equine clients. The Veterinary Ireland survey of the profession in 2013 indicates that one third of veterinary practices are single vet operations. Approximately 700 vets are engaged in TVI services at meat plants although a proportion of this number do not have regular work.

All veterinarians in Ireland must attain a minimum of 20 CVE credits each year to remain on the veterinary register. Vets have embraced the ideology of continued veterinary education with a significant proportion of vets attaining a much higher level annually. A survey of 138 vets in a veterinary group indicates the average number of CVE credits attained is 72.5 for 2015-2016.

The availability of further formal education presented in a practice friendly format has resulted in significant uptake from within the practising profession. The QQI level 9 Graduate Certificate in Dairy Herd Health is an example with over 130 veterinarians either graduated or enrolled in the course. This represents 13.6% of the workforce or more importantly 28% of practices. Other such courses (Cert CHP) are available in both Ireland and the UK and are also popular. Shorter training courses that allow vets to develop skills in the areas of farmer training (Train the Trainer), lameness, mastitis, post mortem examination, in house laboratory setup, bull fertility testing, housing evaluation, artificial insemination and embryo transfer, fertility & ultrasound scanning, and herd health planning are provided by Veterinary Ireland and others resulting in a highly trained and motivated profession. The profession has provided a countryside service since the 1950's and this desire to provide service to clients is evidenced by the map of PVPs that attended training for BVD investigations.



Figure 3: PVPs trained in BVD Investigations in Ireland

Provision of preventative health medicine in large animal practice is dependent on having a critical mass of suitably qualified vets in the practice setup. Peter Orpin states in the publication *Bovine Medicine* that the minimum number of three veterinarians are required within a practice to provide preventative health services. Developing farm animal veterinary services in Ireland to a level which delivers preventative veterinary medicine to the standard required demands a consolidation of veterinary practices to ensure that the sector is sustainable into the future.

Rural veterinary practices appear no longer attractive to veterinary graduates and many are finding it difficult at present to fill vacant positions. There are approximately seventy unfilled positions in November 2016 across the country. This situation is mirrored in Northern Ireland. Poor on-call rotas (<1 in 5), long working hours, stress of rural large animal practice and pay and conditions are all cited as reasons for this situation. Many progressive practices in Ireland find themselves doing out of hours emergency work for smaller typically single vet practices. Practices in the UK are larger and can offer more support to young vets, a better work life balance for similar pay levels as practices in Ireland, making them more attractive. This is evidenced by the fact that fourteen graduates from the 2016 class are working in Ireland at present.

Issues that prevent the development of larger practices include

- Loss of revenue needed to retain veterinary staff such as cessation of brucellosis testing, TB testing in breakdown herds, TVI work for younger graduates and work now being performed by unregulated lay operators. Veterinary practices need a critical mass of billable work during normal working hours to sustain the cost of providing out of hours services to clients.
- The ability of farmers to source and use antimicrobials without a veterinary consultation encourages farmers to use antimicrobials as disease management tools rather than the scarce and precious resource that they are.
- There are no tax incentives to either purchase a neighbouring practice or form partnerships.
- Capital investment in veterinary practices is much less tax efficient than in other business sectors.
- Business training is not a feature of the undergraduate veterinary degree or continued professional development – a knowledge gap exists in this area.
- In other jurisdictions (U.K. and New Zealand) lay operators known as “vet-techs” can only operate within the confines of veterinary practices and under the direct supervision of veterinarians. This results in better animal welfare outcomes and a greater ability of veterinary practices to provide coordinated preventative health programmes.

#### 4.2 Surveillance

The collection, collation, analysis and interpretation of animal health and welfare surveillance data can be used to direct policy, perform risk analysis and horizon scanning as well as facilitate trade through demonstration of Ireland’s animal health status. Veterinary practitioners are the gatekeepers of animal health and welfare and

are the only professional sector to visit farms a minimum of twice annually. PVPs submit samples and carcasses to both the Regional Veterinary Laboratory network and to private commercial laboratories. TVIs also collect and report animal health data at slaughterhouses in accordance with the Beef HealthCheck programme.

PVPs use disease and animal health data to monitor herd health programmes and to create “flags” if issues arise on clients’ farms. The availability of the animal health data of clients to their nominated PVP is an essential tool in the delivery of preventative health programmes called for in this document. DAFM has a leadership role in recognising the importance of this element of the strategy.

## **Recommendations**

High quality surveillance data can be collected and collated by PVPs and fed into the surveillance system designed by DAFM. In practical terms this may be groups of satellite PVP practices that collect and report surveillance as a service provided to DAFM. These practices will then have the ability to ramp up activity should the need arise in the event of a disease outbreak. Such “partner practices” can have other roles within such a contract such as in emergency response and research.

### 4.3 Contingency Preparedness & Emergency Response

The Foot and Mouth Disease outbreak in the UK in 2001 cost the country £4.9bn. Ireland and DAFM contained the outbreak in the Cooley peninsula very successfully at this time. The factors in Ireland’s favour were

- Significantly more vets in the employment of DAFM
- Location – the Cooley peninsula represented an ideal location from an epidemiological perspective
- Goodwill from the Irish nation especially farmers
- PVPs willing to temporarily engage with DAFM to increase the workforce

## **Recommendations**

The State veterinary service is now depleted and DAFM is not in as strong a position to mount an emergency response should a disease outbreak occur here. As with surveillance, DAFM could contract the services of “partner practices” which as part of the contract would undertake training in the areas of exotic diseases, contingency planning, emergency response procedures and epidemiological investigation. Ideally such practices would have multiple vets, have engaged in further professional training and be willing to get involved in the national strategy. In this way DAFM provides supports to progressive practices realising the desired outcomes of this document and the veterinary practices provide supports to DAFM emergency response and contingency planning.

#### 4.4 Traceability & ICT Systems

PVPs provide an annual audit of our traceability system, the AHCS, at the time of the annual TB test. This service maintains our traceability system to a high degree of confidence. Errors in the system are often down to human error at marts or at TB tests in the manual recording of twelve digit numbers.

#### **Recommendations**

A simple solution to the majority of such errors is the introduction of mandatory electronic tagging. This change would facilitate the electronic reading of tags reducing errors and allowing the systematic recording of weights and treatments on farm.

AHCS, as a two way system, can be used to deliver more animal health data to nominated PVPs. Alternatively the ER1 should suffice as a permission to access ICBF animal health data. The availability of such data to PVPs is an essential part of developing the required herd health preventative medicine called for in this national strategy.

#### 4.5 Veterinary Medicinal Products

Veterinarians are the custodians of appropriate antimicrobial usage in most EU countries. In Ireland, legislative changes in 2007 removed the legal requirement to examine animals prior to prescribing antimicrobials and allowed farmers to legally source a twelve month supply of antimicrobial products on the foot of an annual veterinary visit. In addition, certain classes of antimicrobials may be prescribed without an annual visit under Schedule 8 of the Animal Remedies Act. The relaxation of the legislation combined with the difficulty in bringing forward successful prosecutions under the Act has resulted in a culture of antimicrobial availability on many Irish farms. Farmers regularly devise treatment plans for sick animals without consulting a vet and a significant proportion of farms source large amounts of critically important antimicrobials as part of purchasing groups from a minority of practices inside the State and from some outside the jurisdiction. DAFM has recognised some of these issues and has committed to amending the legislation to reduce this phenomenon.

Veterinary Ireland released a policy document on anti-microbial resistance in 2014 and made eight recommendations to DAFM. The recommendations are

1. A national educational campaign should be conducted by *Veterinary Ireland* in conjunction with DAFM, VCI, AHI and the IMB (aimed at each section of the AM chain from manufacturer to vet to end-user) in order to promote awareness of:

- The risks posed by AMR
- The progress made on reducing AMR in veterinary and human medicine
- The difference between antimicrobial residues and AMR
- The reasons why antimicrobial use should be restricted in line with prudent use policies.

2. There should be appropriate legislative change (with enforcement) in relation to the prescribing/use of antimicrobials in animals:
  - The prevention, by DAFM of the acquisition by farmer purchasing groups of large amounts of antibiotics from rouge traders both within and outside the State, for use in the future without a veterinary consultation.
  - Schedule 8 and Regulation 43(9) of the European Communities (Animal Remedies) Regulations, 2007 (ARR) should be repealed to ensure that intramammary antibiotic remedies can be prescribed only as per other antimicrobial products for animals.
  - Ethical Veterinary Practice (as per the Veterinary Practice Act of 2005) should be enshrined in the legal enforcement of the ARR.
  - DAFM (the Department of Agriculture) and the VCI (Veterinary Council) should apply a conjoined approach to the enforcement of legislation such that Registered Veterinary Practitioners (RVPs) prescribing antimicrobials operate through a registered veterinary premises and demonstrate on-going and real, not nominal, veterinary clinical contact with animal keepers.
  - AMs should only be supplied to a registered veterinary practitioner at their registered veterinary practice
  - Legal and financial penalties should be levied on commercial companies that employ RVPs to supply antimicrobials outside ethical veterinary practice (see appendix III for further detail).
3. Herd/group treatment of animals with antimicrobials should be limited to cases where on farm veterinary involvement deems the need. The practice of mass medication should be reviewed at national level in line with EU recommendations.
4. The principles of *Veterinary Ireland's* policy document "Sustainable Animal Health" should be incorporated into Food Harvest 2020, in order to minimize expansion-related disease and associated AM usage.
5. Funding should be made available by DAFM to promote PVP led on-farm technology transfer and risk assessment in order to reduce disease levels and hence antimicrobial usage.
6. Bord Bia Quality Assurance schemes should insist on the requirement for a meaningful on-farm risk assessment and antimicrobial management plan by the farms' PVP, the fee for which would be paid centrally. The level of reduction in antimicrobial useage on these farms over a period of time could then be assessed.
7. Funding should be ringfenced for Research & Development into novel antimicrobials or alternatives to conventional antibiotics and consideration given to either patent extension for novel products and/or a levy on generic antimicrobials.

8. Critically important antimicrobials should be recategorised as VPO, to minimise usage.

Veterinary Ireland has circulated prudent prescribing guidelines to all members in 2016.

### **Additional Recommendations**

Recent research in the area of anthelmintic resistance indicates that the failure rate is 50% of all anthelmintic treatments in the national sheep flock. Anthelmintic resistance is a product of misuse of anthelmintic products without adequate veterinary advice on worming strategies. Training of LM operatives has not resulted in positive outcomes in this area.

The success of the PVP delivered meetings to knowledge transfer groups should be replicated by inserting training by PVPs in the handling and use of antimicrobial products into the Bord Bia Quality Assurance scheme or the Knowledge Transfer programme.

Electronic collection of usage data cannot be realistically collected at farm level while large stocks of antimicrobials remain on Irish farms. Collection of prescription data may be realistic when the necessary legislative changes are made to allow proper control of this precious and scarce resource.

### **4.6 Independent Scientific Advice**

Evidence based medicine depends on the availability of independent scientific advice. Animal Health Ireland's Technical Working Groups have provided such advice since 2009 and have been an important resource for veterinarians. Access to databases such as PubMed and Science Direct is limited in standard veterinary practices.

Many PVPs are not afforded the opportunity to conduct research due to work commitments. The availability of funding and supervision to PVPs to conduct research on a part time basis could be made available by both DAFM and the Veterinary Council. Such research could be used to influence policy, assess risk and inform the profession of the latest evidence based medicine under Irish conditions.

Finally by appointing PVPs onto scientific advisory committees, research can be directed towards practical applications in the field of veterinary medicine.

## **5.0 Summary of Recommendations**

### **5.1 Working in Partnership**

1. Farmed Animal Health Strategy Review Body has adequate representation from the practicing veterinary profession
2. Focus groups be set up including PVPs to assist with strategic planning.
3. Further areas of collaboration between PVPs and DAFM are explored for mutual benefit
4. Strengthening the links between farms and their nominated veterinary practice will deliver improved outcomes on many of the strategic objectives outlined in the document.

### **5.2 Data Sharing**

5. Improved data flow between the farms and their nominated veterinary practices would result in better disease surveillance outcomes as well as enabling flags indicative of poor animal welfare. The ability of local veterinary practices to resolve such issues quickly cannot be underestimated.
6. AHCS, as a two way system, can be used to deliver more animal health data to nominated PVPs. Alternatively the ER1 should suffice as a permission to access ICBF animal health data. The availability of such data to PVPs is an essential part of developing the required herd health preventative medicine called for in this national strategy.

### **5.3 Veterinary Medicinal Products**

7. Farmers should have compulsory training workshops on the sustainable and safe use of antimicrobial products. These workshops can be developed by DAFM in partnership with Veterinary Ireland and delivered to groups by PVPs which will facilitate behaviour change in this area.
8. Electronic collection of antimicrobial usage data cannot be realistically collected at farm level while large stocks of antimicrobials remain on Irish farms. Collection of prescription data may be realistic when the necessary legislative changes are made to allow proper control of this precious and scarce resource.
9. DAFM take definitive action to reduce the availability of stocks of antimicrobials on farms for use outside direct veterinary direction by tightening legislation and regulation, inspecting farm premises and by opposing sale of POMs over the internet.
10. The parasite control risk assessment model delivered by PVPs in Knowledge Transfer should be made available to all farmers to minimise anthelmintic resistance. Anthelmintic products should be classified as POM to slow the development of resistance.

#### 5.4 Knowledge Transfer & PVP-delivered Training

11. Examples of areas in which farmers can receive PVP training include
  - a. PVP-delivered knowledge transfer meetings on animal health
  - b. Responsible use of antimicrobials
  - c. Biosecurity
  - d. Animal welfare and stock handling
12. Funding should be made available to facilitate on farm risk assessments on farm biosecurity by trained PVPs.
13. “Vet-techs” or “paraprofessionals” should receive mandatory training in animal welfare and multidisciplinary team building by PVPs prior to registration. To maximise the outcomes of this strategy “Vet-Techs” should be registered with a veterinary practice as in other jurisdictions.

#### 5.5 Contingency Preparedness, Emergency Planning & Surveillance

14. DAFM contract the services of “partner practices” which as part of the contract would undertake training in the areas of
  - a. exotic diseases
  - b. contingency planning
  - c. emergency response procedures and
  - d. epidemiological investigation.
  - e. ideally such practices would have multiple vets, have engaged in further professional training and be willing to get involved in the national strategy. In return the practices would gather, collate and report high quality surveillance data to DAFM. In this way DAFM provides supports to progressive practices realising the desired outcomes of this document and the veterinary practices provide supports to DAFM emergency response and contingency planning and high quality surveillance.

#### 5.6 Traceability

15. Introduction of mandatory electronic tagging.

#### 5.7 Veterinary Practice Structure & CVE

16. The Veterinary Council of Ireland recognise “Advanced Practitioner Status” as recognised by the RCVS, encouraging PVPs to undergo formal education as part of their CVE requirements.
17. A strategic review of veterinary practice structure in Ireland, including a needs analysis, be undertaken by DAFM, Veterinary Ireland and the Veterinary Council to inform policy decisions going forward.
18. A focus group is set up comprising of Universities, PVPs/Veterinary Ireland, DAFM and VCI to examine factors affecting the availability of farm animal veterinary graduates.

## **6.0 Conclusion**

A national Farmed Animal Health Strategy is welcomed by Veterinary Ireland. The practicing veterinary profession represents a cohort of progressive farm animal vets that intend to consolidate the structure of veterinary practice in Ireland into a model that

- Delivers modern veterinary services to farmers in a sustainable manner
- Attracts the best graduates from our universities
- Facilitates trade through realisation of the animal health strategy
- Protects public health by ensuring safe food from our farms and processors
- Reduces the usage of antimicrobials by reducing disease levels on farms and enhancing biosecurity
- Reduces the carbon footprint of Irish food products through disease prevention and resource efficiency
- Ensures positive animal welfare outcomes
- Provides a reserve to supplement DAFM staff in cases of disease outbreaks, epidemiological investigations and contingency planning.

DAFM can facilitate this process by incorporating the recommendations made in this submission into the National Farmed Animal Health Strategy and other agricultural policies.