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Summary of responses to the consultation on Defra's Contingency Plan for Exotic Notifiable Diseases of Animals held between 18 March and 13 May 2011

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Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR
Telephone 020 7238 6000
Website: www.defra.gov.uk

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Information about this publication and further copies are available from:

Animal Health and Veterinary Laboratories Agency
Area 5C, Nobel House
17 Smith Square
London SW1P 3JR

Email: AHHQContingencyPlanning@ahvla.gsi.gov.uk

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1. Background

- 1.1 In accordance with its legislative obligations under section 14a of the Animal Health Act 1981 (as amended), Defra invited comments on the 2011 version of its Contingency Plan for Exotic Notifiable Diseases of Animals.
- 1.2 The plan was last laid before Parliament in December 2009. Although the plan is reviewed annually, consultation and laying of this latest version was postponed to July 2011 in order to fully reflect lessons from the national FMD exercise, Silver Birch, that took place in November 2010.

2. Summary and analysis of responses

- 2.1 The consultation document was sent to representatives of 79 organisations, via formal letters from Defra. The letters invited comments on any aspect of the Consultation version of Contingency Plan.
- 2.2 The consultation documents were placed on the Defra public website enabling anyone with an interest to submit comments.
- 2.3 Responses were received from:
 1. British and Irish Association of Zoos and Aquariums
 2. British Cattle Veterinary Association
 3. British Veterinary Association
 4. Farm Animal Welfare Committee
 5. Foodchain and Biomass Renewables Association
 6. Goat Veterinary Society
 7. National Farmers Union
 8. Norfolk, Suffolk and Cambs Health Protection Unit
 9. Royal College of Veterinary Surgeons
 10. Warmwell
 11. World Horse Welfare

Plus four independent members of the public.

- 2.4 Although a wide variety of comments were made, a high number of responses addressed matters of control policies (which were not the subject of this consultation) rather than the plan to implement those policies. Nevertheless it is recognised that the he two matters are clearly linked and comments on policy will be considered separately in the context of policy development. This document covers the themes raised on the plan and policies in general terms.

Themes receiving a concentration of responses are shown below along with the Government's response. The Government response does not

attempt to answer each individual point raised, rather summarises the current position relating to that theme.,

Our control policies for dealing with exotic disease are reviewed regularly to ensure they are proportionate and evidence based, within the framework of European and national law. Policies are developed in close partnership with delivery agents e.g. the Animal Health and Veterinary Laboratories Agency, core groups of stakeholders and specialists e.g. veterinary, science and economists. We have increased our evidence base for dealing with and assessing future disease threats, taking account of systematic veterinary risk assessment.

The operational processes and procedures for dealing with a case of disease which underpin the contingency plans are regularly reviewed. Lessons from each outbreak are reviewed, published and implemented. Plans are regularly tested at local and national level, working closely with delivery partners and industry. Most recently, a national exercise, Exercise Silver birch, took place to test our response to a large scale FMD outbreak.

Defra closely monitors outbreaks of high impact diseases around the world and assesses the risk to the UK. We work closely with the UK Border Agency to ensure risk at the border is managed and stepped up if there is particular cause for concern.

All of the measures rely on vigilance by farmers and animal keepers in identifying and reporting possible disease. Monitoring animals for signs of disease, and following good farming practices are essential ways of reducing the risk of disease in the first place and then preventing spread.

2.5 Vaccination

8 of the 15 responses covered vaccination issues.

There was a feeling that the plan did not place vaccination as a first choice and arguments against vaccination are outdated, relate only to economic/trade aspects and that tests to distinguish vaccinated from infected animals are available.

Comparisons were made with how Uruguay handled an FMD outbreak in 2001 and the outcome of the Scottish FMD Moredun Conference held on 15 March 2011 was highlighted. It was felt there was a need to review EU and national policy and legislation.

The approach adopted during the 2007 Bluetongue outbreak was cited to support a vaccinate to live approach and making greater use of private veterinary surgeons and lay support for vaccination programmes was suggested.

It was recommended that Defra should: explore ways of ensuring 100,000 doses of vaccine can be made available within 2 days of outbreak confirmation; look at reducing the time for the vaccination contractor to be operationally ready; and consider use of DNA tags within FMD vaccination zones.

The availability of veterinary surgeons to carry out post-vaccination blood testing was suggested as an additional consideration when deciding whether to vaccinate and the necessity of the 72 hour quarantine period was questioned.

Government response

There are substantial differences in the nature and epidemiology of Bluetongue when compared to FMD. This means that vaccination is the only realistic means of control of Bluetongue once the disease becomes established in a new territory. With FMD, however, stamping out via movement controls and culling is an effective and proven method of eradication although vaccination can play an important role in certain outbreaks.

Vaccination is considered from the outset of any FMD outbreak in accordance with article 14 of ECC 2003/85 that states "*the competent authority shall, immediately upon confirmation of the first outbreak of foot-and-mouth disease prepare all arrangements necessary for emergency vaccination in an area of at least the size of the surveillance zone.*"

Our contingency plan provides a clear, structured process for considering vaccination as a control option. Its deployment would be considered in the light of the disease circumstances at the time and would need to take account of a wide range of factors. It is considered an extra control measure and does not replace the policy of culling of infected animals and their dangerous contacts.

Current contractual arrangements would implement any future vaccination programme under the direction of Animal Health Veterinary Laboratory Agency (AHVLA) and require the contractor to be operationally ready to implement a programme within 5 days of an outbreak.

The final decision on vaccination will be made by ministers, and is devolved in Scotland and Wales.

2.6 Pen side testing

6 of the 15 responses highlighted the availability of pen side tests and suggested testing kits. The May 2011 Science article on FMD infectivity and other scientific papers were also cited in support of the use of pen side tests.

Government response

In recent years pen-side test equipment has been developed for the diagnosis of Foot-and-Mouth Disease. These are not currently used as a diagnostic tool in GB, as the current equipment is not sufficiently reliable particularly in relation to negative results. Therefore any samples taken from suspect animals will always need to be submitted for testing by the National Reference Laboratory.

The potential benefit of using pen-side tests in the future is recognised and being kept under review as the technology advances.

2.7 Slaughter on suspicion and dangerous contacts

5 of the 15 responses raised issues around the use of slaughter on suspicion and dangerous contacts. It was suggested that the Animal Health Act (2002) encouraged a disproportionate response; the use of slaughter on suspicion was embedded in policy; and that using pen side tests could stop the need to use this policy. It was also suggested that the alert status should not move to red without lab results.

Government response

Control policies for many exotic notifiable diseases require the swift culling of infected animals in order to prevent spread of disease. During a disease investigation, other premises may be identified which relate to where the disease may have come from or spread to. An assessment will be made about the level of infection that any susceptible animals on the premises may have been exposed to. If the risk of exposure is very high the animals would normally be culled to prevent further spread of disease. If the level of exposure does not warrant culling of animals, the premises would be restricted and the animal(s) regularly monitored for signs of disease.

Defra does not consider this approach to be disproportionate. The contingency plan makes clear that it is Defra's objective to eradicate disease and regain disease free status and explains the considerations to achieve that goal.

2.8 Resourcing

8 of the 15 responses.

Respondents felt there was a need to ensure roles identified have suitable resource to undertake them and the plan should detail where the resources will come from.

Several respondents questioned the future availability of labour resource from the private sector, particularly veterinary resource, and from Local

Authorities in light of current government cuts to non-emergency activities. The consistency of engagement with contingency Official Veterinarians was also questioned as was the replacement of those withdrawing their services.

On training it was suggested that the plan overestimated the internal training taking place and that a 4 day new entrant's course was inadequate. There was also a need to ensure training is provided for incoming staff, that these are working within their competences and that best use is made of their expertise.

Also on expertise, it was suggested there should be a greater veterinary input directing the disease control and that NEG should include experts from relevant fields (e.g. vaccination, diagnostic testing and EU legislation) as well as government officials.

Finally there were questions around laboratory capacity, the availability of suitable valuers and the development and availability of detailed field manuals.

Government response

Suitable resourcing is clearly identified by roles and responsibilities set out in the contingency plan to allow a swift and effective response to disease outbreaks should the need arise.

All incoming and present staff are suitably trained to respond to an outbreak or incident of exotic notifiable disease of animals. Most recently, a national exercise, Exercise Silver Birch, took place to test our response to a large scale of an FMD outbreak.

Lessons from each outbreak of disease are reviewed, published and implemented. Plans are regularly tested at local and national level, working closely with delivery partners and industry and there is ongoing dialogue with stakeholders.

Training of staff for field work, e.g. Case Officer training is refreshed and delivered each year to ensure staff are up to date with procedures.

Detailed operational instructions have been developed and are available for AHVLA staff via the online Operations Manual. Extracts of these instructions are available to the public on request.

In addition, AHVLA constantly monitor and address issues relating to operational matters. The contingency plan includes options for additional staff to be taken on during an outbreak.

2.9 Working with devolved administrations

4 of the 15 responses.

Respondents felt there was a need to clearly illustrate how the Defra plan ties in with those for the other UK administrations, how the administrations work together to deliver a coordinated response that does not adversely impact each other and how limited resources are prioritised between administrations.

Government response

Although the plan describes structures where representatives from across the UK administrations are brought together to ensure a coordinated response (e.g. the Joint Co-ordination Centre and the Animal Disease Policy Group), it is primarily a contingency plan for England and is complemented by equivalent plans produced by the other UK administrations.

It is however recognised that there is a need to more clearly articulate how the country plans fit together and in order to do so, an overview plan covering the UK is in production.

2.10 Welfare of animals

4 of the 15 responses.

Respondents felt that restrictions should be managed to avoid welfare issues and there was a lack of available on-farm infrastructure to cope with unexpected movement standstills. It was also pointed out that the plan made no mention of a welfare disposal scheme and that additional support should be considered by the Animal Health and Welfare Board.

Government response

All keepers of animals have a duty of care to their animals. They should anticipate problems and emergencies and make appropriate arrangements to mitigate the effects, including those associated with disease control, as part of normal business planning. The contingency plan recognises the issues that may arise during restrictions due to disease control measures and explains the need for the keeper to consider the possibility of arranging for animals to be humanely culled on farm, if welfare issues cannot be alleviated in any other way. Defra will consider movements under licence for welfare reasons at any time after disease restrictions have been applied. But permitting such movements will very much depend on the disease situation at the time.

During a disease outbreak, where on farm action to alleviate welfare problems is required, Defra action will be limited to advice on how to access killing and disposal services. The industry will be expected to meet the cost of any killing and disposal services used. If all other options have been exhausted and, where necessary to prevent an unacceptable deterioration in welfare standards, Defra will consider the

need for a Welfare Disposal Scheme on a case by case basis during a disease outbreak. If introduced, a disposal scheme would only apply to animals that cannot be moved under licence to a slaughterhouse, abattoir or purpose built killing plant. No payment would be made to livestock keepers for animals slaughtered/killed under such a scheme.

2.11 Complexity of the plan / use of jargon

7 of the 15 responses.

Whilst some respondents were please with the new, simplified layout, others felt that the structures described are overly complex with too much overlap, that the plan was not written in plain English, has too many acronyms and that terminology like “battle rhythm” is distressing.

Government response

As part of this review, the plan was re-written in an attempt to describe the structures and processes in a simpler and more concise way. The plan uses established emergency response terminology that is not intended to cause distress but rather convey the seriousness of the matter at hand. For this iteration, a glossary has been added as a reference to the acronyms. Encouraged by the positive feedback, we will seek to further improve the presentation of the plan for the next iteration.

3. The way forward

- 3.1 Having considered all comments received and amended the plan where appropriate, a revised version of Defra’s Contingency Plan for Exotic Notifiable Diseases of Animals was laid before Parliament on 4 July 2011. The plan can be viewed online at:

www.defra.gov.uk/animal-diseases/controls/.

- 3.2 The Plan will be reviewed again in 2012.