



## **BVA Welsh Branch written response to the Economy, Trade and Rural Affairs Committee call for evidence on the Agriculture (Wales) Bill**

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues, and employment matters.
2. BVA Welsh Branch represents members in Wales, bringing together representatives of specialist and territorial divisions, government, academic institutions, and research organisations in Wales. The branch advises BVA on the consensus view of members in Wales on Welsh and UK issues.
3. We welcome the opportunity to respond to the Economy, Trade and Rural Affairs Committee call for evidence on the proposed Agriculture (Wales) Bill. We broadly support the proposed bill and welcome the increased emphasis on protecting Animal Health and Welfare from earlier drafts of the Bill.
4. Our key points are:
  - Animal health and welfare must be an integral part of the new regulatory framework, and we are pleased to see the paper specifically states that regulatory reforms will include improvements to animal health and welfare.
  - It is important that any new regulations do not reduce standards and take care to avoid any loopholes which may result in lower standards of animal health and welfare. As animal health and welfare specialists and advocates from farm to fork, veterinary surgeons should be involved in the development of the National Minimum Standards, to ensure they minimise the risk of welfare harms and ensure animal health and welfare is properly protected.
  - To ensure the updated regulations can have an impact on the ground, it will be essential that they are clearly communicated and understood. Our high animal health and animal welfare standards rely on effective communication between farmers, their own vets and government vets, for example to enable effective disease surveillance to be carried out. The veterinary profession is key to ensuring there is good widespread understanding of the minimum standards.
  - We support the Sustainable Land Management approach as a means to incentivise public goods, and the outcomes-based approach that will underpin the SLM scheme. However,

there needs to be more clarity on how Animal Health and Welfare will be supported beyond the legal baseline. We accept that the scheme is intended to improve animal health and welfare standards, but the weight given to animal health and welfare within the framework is insufficient given the high proportion of livestock farming in Wales.

- The role of the veterinary surgeon must be properly recognised. Vets are regarded as the most influential advisors to farmers within the decision-making process. They should be included within the development of the standards and monitoring to reflect this role as experts on animal health and welfare, and as trusted advisors on animal health and welfare planning, husbandry, biosecurity, biocontainment and preventative medicine.
- We recognise that it may be necessary to control wildlife where there is a negative impact on human and animal health, food, agriculture, property or the environment. If a problem is identified, we support the responsible use of the most humane control methods available, which first requires consideration of whether it is necessary to control pests at all. Before lethal control is considered, prevention methods or deterrents should be implemented, and finally, if lethal control of pests is considered necessary, methods that minimise suffering, fear and pain should be used. Both glue traps and snares significantly compromise animal welfare for the period during which animals are trapped, and there are welfare concerns associated with methods of killing of trapped animals. They are also indiscriminate and may capture wild and domestic species for which their use is not intended, resulting in death or significant injury to these animals. In our policy positions on the [use and sales of snares](#) and on [glue traps](#) we call for outright bans on the use and sale of these devices. We therefore support the proposal for a power to enable increased controls covering the manufacture, sale and use of snares and glue traps.

5. Achieving the minimum standards should not be considered an aspiration for farmed animals. The ambition should be to encourage the highest standards and raise the bar at every level. Providing incentives and rewards for high achievers is important to continue raising standards and encourage improvements at all levels. This principle has shown to be effective in Farming Connect “champion” demonstration farms. A critical component in the success of this knowledge transfer programme is its role of sharing best practice and cascading information to the wider industry through a programme of high-profile demonstration site events and promotional tools.
6. As agricultural policy in the UK is devolved, administrations have been able to shape agricultural policy to the needs of their respective jurisdictions. At the same time, the EU has ensured a degree of coherence to agricultural policy amongst all four administrations. Brexit presents an opportunity to tailor agricultural policy to suit the countries of the UK, however coordination and oversight on matters of animal health and welfare is crucial. There will therefore need to be consideration where decisions on agricultural policy are taken, and how best to coordinate efforts across the nations of the UK.
7. To facilitate this, we would welcome the establishment of a UK wide body to oversee and coordinate animal health and welfare policy across the four administrations of the UK and facilitate partnership working between industry and government to tackle endemic disease and animal health and welfare challenges.
8. Government should also promote the benefits of properly valuing quality animal-derived products, where quality encompasses good animal health and welfare, food safety, environmental protection and fair returns for producers.
9. We would welcome the opportunity to work closely with the Welsh Government to expand upon these proposals.