

15 July 2010

Dear Sirs,

BVD Eradication Scheme for Scotland IAAS Consultation paper response

The Institute of Auctioneers and Appraisers in Scotland welcomes the opportunity to comment on the options for the Eradication of BVD in Scotland. The Institute represents all Scotland's livestock marts, Institute members have businesses in many rural towns throughout Scotland whose principal business is organising and facilitating the public sale of livestock, selling approximately 3,500,000 head of livestock with a value of almost £500,000,000 annually.

Rationale for a national scheme

Question 1(a): Do you agree that action to tackle BVD is necessary?

The eradication of BVD in Scotland can only be an advantage to the auction system if implemented correctly. The increased health of the Scottish cattle herd must be an advantage over cattle from areas that is not BVD free.

Question 1(b): If so, do you agree that eradication should be the aim?

Eradication must be the aim or it will give a two tier marketing system and be a disadvantage and cause marketing issues.

Question 1(c): If you agree that eradication is desirable, should there be a compulsory scheme?

A compulsory scheme is the only way of getting eradication.

Question 1(d): If not, do you have an alternative suggestion for controlling BVD?

No

Outline of a national eradication scheme

Question 2: What are your views on this two -stage approach to disease eradication?

A two stage approach would give flexibility for cattle keepers and give the industry time to test and remove infected animals. There is a concern that there will be marketing issues for auction marts, possibly through trade disruption or unworkable bio-security requirements. Markets must be allowed to operate without restriction to remain competitive.

Compulsory vaccination should be considered in phase one (with the exception of accredited herds) to allow free trading without risk of re-infection and as a bio-security insurance.

Question 3: Are there aspects of the scheme that you feel are currently allocated to the wrong phase?

No

Question 4: When should the compulsory phase start:

After two years would give the industry time to adapt.

Dealing with Persistently Infected animals

Question 5: Do you agree that there should be an initial financial incentive for the prompt culling of PIs?

Yes, this would speed up the removal of infected cattle. As financial resources are limited should any payments be directed to the breeding herds only?

Question 6: Do you agree that the payment should be phased out when eradication becomes compulsory?

Yes, this would give the incentive to remove PI's early.

Designation of laboratories

Question 7: Should the Scottish Government designate laboratories, and should only designated laboratories be allowed under the scheme?

All laboratories operating to approved standards should be able to take part in the testing.

Question 8: What are your views on aggregated test results for negative BVD infection being reported to the Scottish Government?

Certification and investigation by Scottish Government would be required to verify and audit the scheme.

Question 9: Do you consider that laboratories or the customers would incur any significant additional costs as a consequence of the proposed approval system?

The cost of the eradication scheme should be kept to a minimum for the cattle keepers. Assistance for the cost of herd screening and testing of herds found with PI cattle would be beneficial to the uptake of the scheme.

Screening tests

Question 10: Do you agree that an annual screening test for BVD should become mandatory for all cattle herds in Scotland?

Yes, screening tests are the only way of effectively monitoring the health status of the Scottish cattle herd. If the screening costs of breeding herds was met by Scottish Government this would limit the number of PI cattle entering the markets and remove the need for testing feeding cattle if from free herds.

Vaccination

Question 11: Do you agree that vaccination should be voluntary?

Vaccination should be voluntary, best practice should advise vaccination where there are movements of cattle that might cause risk of BVD.

Compulsory vaccination should be considered in phase one (with the exception of accredited herds) to allow free trading without risk of re-infection and as a bio-security insurance.

Movement of animals into herds

Question 12: What are your views on the restriction on the sale of PI animals other than direct to slaughter?

PI animals should be sent to slaughter to prevent re-infection in a limited time period.

Question 13: Do you agree that farmers should be required to make declarations on health status when presenting animals for sale during phase two?

Yes, declarations would give potential purchasers the required information but needs to be a verifiable declaration to be meaningful.

Question 14: Do you agree that we should require quarantine and testing?

Yes, arrangements must be in place to allow cross border trade, free trade must be allowed.

Question 15: Do you agree that we should allow extended quarantine under strict veterinary control for finishing units?

Possibly but this would be an advantage to direct selling and disadvantage the auction system.

Farm-level Biosecurity

Question 16: Do you agree that, in phase two, there should be a general obligation to protect neighbouring farms?

Yes, nose to nose contact will cause the risk of spread and will not assist in quick eradication without separation.

Question 17: What are your views on requiring action from farms which persistently have BVD in their herds?

Quick eradication is to the benefit of all industry and restrictions will be required of problem farms.

Financing an eradication scheme

Question 18 (a): Do you agree that there should be some financial input from the Scottish Government into this scheme?

Yes, to get full industry support financial assistance will be required especially at times of poor financial returns for cattle keepers.

Question 18 (b): If so, do you agree that support should be focussed on the removal of PIs in the initial voluntary phase?

Yes, this would accelerate the removal of PI's and speed up eradication but enough budget should be made available for the full eradication scheme covering the cost of testing and the removal of PI's.

Question 18 (c): What level of payment would provide a reasonable incentive for the prompt removal of PIs?

The greater the financial payment the quicker the removal of PI's.

Animals other than Cattle

Question 19: Should Camelids be included in this scheme?

Yes, if being mixed with other susceptible animals they should come under the same controls.

Legislation

Question 20: Do you agree that there would be a need for legislation to make a BVD eradication scheme effective?

Yes, Without legislation eradication would be very difficult to eradicate

Question 21: Do you agree with the proposals to create legislation as outlined above?

Yes

Question 22: Do you agree that the requirements of the scheme, and of each phase, should apply across Scotland from the same dates?

Yes

General

Question 23: Do you have any other comments about eradicating BVD?

We are supportive of the eradication plans although there is great concern in markets that the scheme will have a dramatic effect on marketing patterns and be a disadvantage to the auction system. Great efforts must be made to allow free trade to continue.

Farm Level Impacts

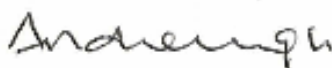
Question 24: Are the assumptions made above realistic?

Yes

Question 25: If your cost of production fell as a result of eradicating BVD, would you keep (a) more, (b) the same or (c) fewer animals?

Not relevant

For and on Behalf of
The Institute of Auctioneers and Appraisers in



Scotland

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