

Consultation Response Form

Consultation on the Introduction of Quarantine Units.

The Welsh Government is inviting your views on the introduction of Quarantine Units to provide exemptions to the current 6-Day Standstill arrangements for cattle, sheep and goats.

This consultation has been issued to capture views from all interested stakeholders, the public, industry and the farming community.

Please submit your comments by 12 February 2016.

DATA Protection
<p>Any response you send us will be seen in full by the Welsh Government staff dealing with the issues covered in this consultation. It may also be seen by other Welsh Government staff to help them plan future consultations.</p> <p>The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response. We will then blank them out.</p> <p>Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.</p>

Confidentiality

Responses to consultations are likely to be made public, on the internet or in a report.

If you would prefer your response to remain anonymous, please tick here:

☐**Response Form**

Consultation on the proposed introduction of Quarantine Units		
Name	Wales Animal Health and Welfare Framework Group	
Organisation (if applicable)		
Address (include postcode)		
Email Address	WAHFG@wales.gsi.gov.uk	
Telephone		
Type (please select by placing a tick next to the appropriate type opposite)	Member of the farming community	
	Public Body (Local Authority, Police, Fire and Rescue Services etc.)	
	Professional Body / Interest Group	
	Third Sector (Community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	
	Other (not listed above) please specify below:	X
	The Wales AHWF Group is a publically appointed Group of six experts who provide advice and support to Welsh Government Ministers to aid implementation of the Wales AHWF. They have a pivotal role in providing a recognised link between the Welsh Government, livestock keepers, animal	

	owners, industry representatives and the veterinary profession. The CVO Wales is an ex officio member of the Group. The views of the Chief Veterinary Office for Wales (who is an ex-officio member of the Wales AHWF Group) are not represented in this response.
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Question 1

To what extent do you agree with the benefit of implementing Quarantine Units to replace the current 6-Day Standstill Rule exemptions?

(Please tick)

Strongly Agree	<input checked="" type="checkbox"/>	Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Strongly Disagree	<input type="checkbox"/>
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Please provide an explanation for your response below:

The Wales AHWF Group strongly agree with the benefits presented of implementing Quarantine Units. The concept supports the whole basis of the Wales AHWF which are to promote the benefits of high standards of animal health and welfare, prevention is better than cure, high standards of biosecurity practices to minimise disease spread.

We do feel that the complexity of the issue is challenging and to ensure maximum buy-in from the industry, implementation of quarantine units should be as simple and effective as possible. The rules will need to be clearly understood. An example could be to expand on the definition of what it actually means to disinfect lorries, is it wheels or the whole vehicle. It also seems unnecessary to expect some farmers to disinfect transport vehicles on the way to the QU while some flexibility in the need to cleanse and disinfect should be accepted when farmers are simply observing stock as opposed to handling them. Throughout the paper, reference is made to scheme guidelines and application forms for farmers. It will be important that these are presented in as clear and concise a way as possible.

Question 2

The Proposed Changes - What are your thoughts relating to the proposed QU process?

With reference to the process flows and supporting notes provided on pages 11 to 21 we are interested to hear your views on the proposed process and any areas that you feel have been omitted or are unclear.

Applying for a Quarantine Unit

The Wales AHWF Group is committed to raising the standards of animal health and welfare in Wales and would support the process set out on pages 11 and 12 for applying for a Quarantine Unit. The Group agree that QU's do need to be verified by a certified body. However the Group have discussed in detail who is best placed to carry out the inspection of quarantine units and there have been differing views. An option proposed but not accepted by all was that vets should be able to carry out the quarantine unit inspections and whether consideration of the role of the vet in the process of applying for a Quarantine Unit is something which could be considered in the future once the proposed system has been bedded in and reviewed.

We would also be interested to know more about the cost of the proposed fees which will be paid to the Certifying Body and to APHA for undertaking the inspection of QUs when in-use.

Validation and Allocation of QU CPH Numbers

The Wales AHWF Group would support the process set out on pages 13-15. We would welcome clarification on the process and timings around the appeal process mentioned in Step 3b. For example, will there be a time limit on appeals with a set number of days for all parties involved to work through the process. UKAS will require this to be specified, the expected timescale being 28 days.

Maintaining a QU – 18 Month Re-Approval

The Wales AHWF Group would support the process set out on pages 16 -17 for QU's to be re-approved after 18months.

QU In Use Inspections

The Wales AHWF Group would support the process set out on pages 18-21 on In-Use Inspections. However, the Group feel that the requirement to supply the individual IDs of the animals in the QU was overly complex and that notification that the QU is in use with "X" number of animals is sufficient. IDs can be checked during the visit.

Question 3

Nature and number of QUs per farm premises - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.

a) Which one of the four options illustrated in pages 22 to 24 do you feel should be considered further (please tick):

(Please tick)

Option 1	<input type="checkbox"/>	Option 2	<input checked="" type="checkbox"/>	Option 3	<input type="checkbox"/>	Option 4	<input type="checkbox"/>
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Please provide an explanation for your response below:

The Wales AHWF Group would support Option B “Only one QU per farm, comprising either one or two separate sites operating as one unit i.e. any animals entering either site would restart the 6DSS on both sites.

We believe that this represents the simplest option for farmers. We would welcome clarification on the definition of a movement and whether this includes movement to an abattoir. There are no proposals to amend the current exemption that allows movement from a holding (including QUs) direct to slaughter (schedule 1, Article 6). We would also welcome clarification around moving cattle to and from shows.

b) Are there any other pros or cons that should be included and therefore considered?

Complete the table below to provide us with your suggested changes or additional pros or cons for us to consider. Please feel free to either insert more rows (for electronic responses) or continue on a separate sheet (for hard copy responses) if more space is required.

Option	New (N) or Amend (A)	Please describe your suggested change and include your reasoning.

Question 4

Changes to the Disease Control (Wales) Order 2003 - your views are being sought as to whether you agree or otherwise with the proposed changes.

a) To what extent do you agree with the proposed changes set out in pages 25 - 33?

(Please tick)

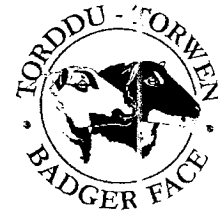
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Cymdeithas y Defaid Mynydd Torddu-Torwen Cymreig Badger Face Welsh Mountain Sheep Society

Patron: HRH The Prince of Wales

General Secretary: Meriel Weston
Pant Y Bara, Milo, Llandybïe, Rhydaman SA18 3NJ
Tel: 01269 844122 Email: meriel@badgerface.org.uk

Membership & Registration Secretary: Mr Glyn Hawker,
Troedrhiwfedwen, Llanbister Rd, Llandrindod Wells, Powys LD15UP
Tel: 01547 550244 Email: glyn@welshmountainsheep.org.uk



10 February 2016

Dear Sir/Madam

Quarantine Units

Thank you for the opportunity to comment on the possible introduction of Quarantine units in Wales. At present the 6 day rule along with isolation facilities has met most requirements, it is doubtful that many members will want to create quarantine units, the cost and the suitability of holdings to adapt being factors.

We are aware that these measures are aimed at improving traceability especially in the event of a disease outbreak, however we feel it should not be implemented until EID Cymru and the CPH Project are well embedded and you can be sure electronic reporting is 100%. In our experience broadband connection is far from perfect and we know for a fact some of our members do not own computers and are not computer literate so 24 hour reporting is a problem.

Showing sheep will be influenced by QUs as a number of shows fall within the 6 day standstill period and if members do not take up QUs show entries will be reduced. Many shows are already struggling for entries and would then possibly disappear. There needs to be some explanation as to how QUs would work with cross border farms and with sheep being shown that come from outside Wales.

This new suggestion for the introduction of QUs obviously covers cattle and goats – why are camelids not included as it is recognised that they have a significant TB problem.

We trust that you will find these comments helpful.

Meriel P Weston

Confidentiality

Responses to consultations are likely to be made public, on the internet or in a report.

If you would prefer your response to remain anonymous, please tick here:

☐**Response Form**

Consultation on the proposed introduction of Quarantine Units		
Name	BADGER FACE WELSH	
Organisation (if applicable)	MOUNTAIN SHEEP SOCIETY	
Address (include postcode)	c/o PANT Y BARA, MILO, LLANDYBIE, RHYDAMAN SA18 3NT	
Email Address	meriel@rambaudbeniger.co.uk	
Telephone	01269 844122	
Type (please select by placing a tick next to the appropriate type opposite)	Member of the farming community	✓
	Public Body (Local Authority, Police, Fire and Rescue Services etc.)	
	Professional Body / Interest Group	
	Third Sector (Community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	✓
	Other (not listed above) please specify below:	
	BREED SOCIETY	

Consultation Response Form

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This consultation has been issued to capture views from all interested stakeholders, the public, industry and the farming community.

Please submit your comments by 12 February 2016.

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Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Confidentiality	
Responses to consultations are likely to be made public, on the internet or in a report.	
If you would prefer your response to remain anonymous, please tick here:	<input checked="checked" type="checkbox"/>

Response Form

Consultation on the proposed introduction of Quarantine Units		
Name	[REDACTED]	
Organisation (if applicable)	[REDACTED]	
Address (include postcode)	[REDACTED]	
Email Address	[REDACTED]	
Telephone	[REDACTED]	
Type (please select by placing a tick next to the appropriate type opposite)	Member of the farming community	X
	Public Body (Local Authority, Police, Fire and Rescue Services etc.)	
	Professional Body / Interest Group	
	Third Sector (Community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	
	Other (not listed above) please specify below:	

Question 1

To what extent do you agree with the benefit of implementing Quarantine Units to replace the current 6-Day Standstill Rule exemptions?

(Please tick)

Strongly Agree	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Strongly Disagree	<input checked="" type="checkbox"/>
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Please provide an explanation for your response below:

I do not feel the current rules are complicated or difficult to understand. Our isolation facility was simple to set up, checked by our vet and works well for our family farm.

Veterinary opinion is that the standstill rules should remain.

Quarantine units will be very expensive for individual farms to implement.

Smaller, family farms will not have buildings or fields of the correct type or position available to set aside as a QU.

Double fencing will be expensive and will reduce the amount of grazing available.

More certification, accreditation and inspection will not benefit farms, already amply inspected and regulated.

Farms without a QU will be placed in a less competitive trading position compared with farms with a QU.

The existing arrangements for an isolation unit work extremely well on our farm, allowing us to take part in world class agricultural shows with our top class stock, without impacting on the 'commercial' side of the farm. This opportunity would be denied us under the proposed QU arrangements. Showing our stock at the RWAS and others is an important 'shop window' for our native breed sheep.

Question 2

The Proposed Changes - What are your thoughts relating to the proposed QU process?

With reference to the process flows and supporting notes provided on pages 11 to 21 we are interested to hear your views on the proposed process and any areas that you feel have been omitted or are unclear.

Applying for a Quarantine Unit

Bureaucratic

Validation and Allocation of QU CPH Numbers

Maintaining a QU – 18 Month Re-Approval

QU In Use Inspections

Question 3

Nature and number of QUs per farm premises - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.

a) Which one of the four options illustrated in pages 22 to 24 do you feel should be considered further (please tick):

(Please tick)

Option 1		Option 2		Option 3		Option 4	
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Please provide an explanation for your response below:

Remain with the status quo. It enables us to buy/sell rams and show our sheep without the risk of disease spreading to our main flock, it is relatively easy to implement.

b) Are there any other pros or cons that should be included and therefore considered?

Complete the table below to provide us with your suggested changes or additional pros or cons for us to consider. Please feel free to either insert more rows (for electronic responses) or continue on a separate sheet (for hard copy responses) if more space is required.

Option	New (N) or Amend (A)	Please describe your suggested change and include your reasoning.
		Please see response to the first question.

Question 4

Changes to the Disease Control (Wales) Order 2003 - your views are being sought as to whether you agree or otherwise with the proposed changes.

a) To what extent do you agree with the proposed changes set out in pages 25 - 33?

(Please tick)

Strongly Agree		Agree		Disagree		Strongly Disagree	x
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b) If you disagree or wish to provide any further comments please complete the table below.

Please feel free to either insert more rows (for electronic responses) or continue on a separate sheet (for hard copy responses) if more space is required.

Ref No.	Your views
	The existing arrangements are fine, these changes are more layers of bureaucracy which will not help maintain animal health or farm efficiency.

From: Fiona Steiger <fs@bmpa.uk.com>

Sent: 11 February 2016 11:51

To: animaldiseases

Subject: 6 Day Standstill Changes

Hello,

The British Meat Processors Association in principle supports the changes proposed by the Welsh Government on the standstill requirements, but we do wonder how practical they are. We think there is a possibility that farms would struggle to get approved, separate access, the biosecurity procedures, separate effluent, etc. However, it is a move in the right direction and that not all farms may not be able to meet the requirements is not necessarily a reason to not introduce the changes, but we would like the practicalities to be considered again.

Best wishes

Fiona

Fiona Steiger

Deputy Director

BMPA

12 Cock Lane

London

EC1A 9BU

Tel: 020 7329 0776

BVA WELSH BRANCH RESPONSE TO WELSH GOVERNMENT CONSULTATION ON THE INTRODUCTION OF QUARANTINE UNITS

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom and has over 15,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and 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 brings together representatives of the BVA's territorial and specialist divisions, government, academic institutions and research organisations in Wales. Welsh Branch advises BVA on the consensus view of the Welsh members on Welsh and United Kingdom issues.
- 3) We were pleased to have been given the opportunity to respond to the Welsh Government consultation on the introduction of quarantine units following on from our contributions in 2014 in support of the preservation of the six day standstill (6DSS) exemption for visits to veterinary practices. To facilitate this BVA developed a standard operating procedure for ensuring good biosecurity at veterinary practices which was agreed by the Welsh Government. Alongside the maintenance of this essential exemption we are supportive of the proposal which would simplify the current requirements for farmers adopting QUs, by removing the many exemptions currently available but at the same time providing a workable balance between managing disease risks and allowing flexibility to trade.

To what extent do we agree with the benefit of implementing Quarantine Units (QU) to replace current 6-Day Standstill (6DSS) rule exemptions?

- 4) We agree that in order to continue to mitigate disease risk and spread, simplify the present system and facilitate trade; it would be beneficial to introduce quarantine units (QU) to replace all existing exemptions involving isolation facilities. However, we wish to emphasise that 6DSS rules were introduced to mitigate the risk of outbreak and spread of foot and mouth disease, and consequently QUs must adequately mitigate such a risk and via their approval, management and inspection, form the basis for ongoing dialogue around effective biosecurity. We are pleased to note that the operational rules allow for animals to leave a QU for veterinary treatment provided they (and any new born offspring) return to the QU for the remainder of their 6DSS period.

Proposed Changes - What are your thoughts relating to the proposed QU process?

- 5) We broadly agree with the proposed QU process and we would strongly support the inclusion of an advisory role for veterinary practitioners in the planning and design of suitable facilities for QUs in order to improve both their initial approval and subsequent inspection by assurance bodies. We propose that beyond the facilities themselves, veterinary knowledge and expertise in disease control may be essential in the development of the inspection criteria, inspection and assessment of the appropriate use of QUs and in addition would contribute to improved general biosecurity awareness and practices on farms considering QUs.

- 6) In order for "unannounced inspection" visits to QUs to be effective, inspectors will need to know when these premises are in active use for 6DSS of recently arrived livestock. This means that Government would need to be assured that livestock movement reporting systems were fully effective and that farmers using QUs were prompt and reliable at notifying such movements. It would be important to know that the Welsh Government has addressed this issue prior to adopting any new measures.
- 7) The proposal suggests that electronic notification of animal movements into or out of a QU must take place within 24 hours of the movement. However, we understand that there may be poor and intermittent broadband coverage in isolated rural area in Wales. We suggest that an alternative option to notify by telephone or text within 24 hours of stock movement is required and should not compromise the ability to carry out spot checks.
- 8) We suggest that the development of QUs on farms should be supported where possible by the Welsh Government and Rural Development Programme (RDP) funding.

Nature and number of QUs per farm premises – which option should be considered and are there any pros or cons that have not been considered?

- 9) BVA supports option B – the designation of one QU per farm comprising one or two separate sites operating as one unit i.e. any animals entering either site would restart 6DSS on both sites. This option provides for one indoor and one outdoor site managed under the same County Parish Holding (CPH) number balancing flexibility for the farmer and ease of administration and management.
- 10) We remain concerned that outdoor QUs may be less effective at mitigating the risk or spread of disease, particularly for airborne diseases, and would suggest that it may be sensible to inspect outdoor QUs more frequently when they are in use to address this.

Changes to the Disease Control (Wales) Order 2003 – do you agree or otherwise with the proposed changes?

- 11) We agree with the proposed changes and support the maintenance of the exemption for stock visiting veterinary premises.

General comments

- 12) It is reasonable to assume that small farms and holdings may have an interest in registering a QU to facilitate stock movements between summer shows. If a cost scale is included to facilitate the development of QUs on small farms and holdings there may be an opportunity to improve standards of animal health and welfare through engagement in farm assurance

Six Day Standstill – Consultation on the Introduction of Quarantine Units

Welsh Government Consultation WG 27374

Date 12 February 2016

1 Introduction

The CLA is the membership organisation for owners of land, property and businesses in rural England and Wales. We help safeguard the interests of landowners and those with an economic, social and environmental interest in rural land and the rural economy. Between them our members own and manage about half of the rural land in England and Wales, including edge of settlement locations and some urban portfolios.

We have been looking after the interests of our members, as well as promoting the positive aspects of land ownership, land management and rural business activities for the past 100 years. The quality of the countryside and its natural resources are of vital importance to our members. Most objectives for the countryside - economic, social and environmental - rely on landowners and managers for their success. Equally, a healthy environment relies upon a thriving rural economy and financially viable agricultural businesses.

2. Consultation Questions

Question 1 To what extent do you agree with the benefit of implementing Quarantine Units to replace the current 6-Day Standstill Rule exemptions?

Agree

Whilst members in general welcome the introduction of Quarantine Units, many feel that the theory is diluted by the reality of the scheme as proposed. Concerns centre on two key points, the establishment and maintenance of the QU and the reporting procedures to be adopted in relation to their use. Several members have commented that the proposals as published appear to have been written from the premise that a disease outbreak exists and is therefore overtly burdensome.

The principles are not contentious but the manner in which it is suggested that they are achieved gives rise for concerns. Some members have commented that the requirements could be

Six Day Standstill – Consultation on the Introduction of Quarantine Units

Consultation Response to Welsh Government

February 2016

difficult if not impossible for a smaller enterprise to fulfil. This is both from the point of view of space and cost.

Several have cited concerns over the prospect of obtaining planning permission for premises that are outside of or extend the existing the curtilage of the current farmstead and many are wary of becoming embroiled in expensive planning applications. We suggest that there may be a need for Welsh Government to consider specific planning guidance on the merits of on farm quarantine units to assist Local planning authorities to see the need for such developments. Furthermore we also suggest that consideration for financial assistance in establishing such buildings should be considered under the Welsh Government Rural Communities- Rural Development Programme 2014-2020.

Beyond the farming practicalities of the unit, the biggest concern is the requirement for electronic reporting within 24 hours. Whilst we acknowledge an improving situation with regards to broadband provision, these proposals are viewed by many in the lesser served areas as beyond their current capability. Some have gone so far as to question whether this requirement is actually discriminatory as it effectively excludes those that cannot comply from achieving the operational rules cited.

Members accept the need for reporting the use of these facilities however we contend that there should be an alternative telephone service to facilitate such notification. BCMS accepts movements by telephone and members can see no reason why movements of other species cannot be similarly recorded. We contend that the critical element of the initial report is the fact that the unit is in use not exact details of what it houses. The administrative details should be secondary and could be resolved if necessary at the point of inspection, e.g. if a unit is notified as occupied by 40 sheep, the identity of those particular sheep can be confirmed as a secondary piece of information. The individual identification of sheep at the initial notification of occupation of the QU is onerous and in the case of movements from a livestock market is also unnecessary as the livestock market would have the off movement through their reporting to EIDCymru.

Question 2 The Proposed Changes - What are your thoughts relating to the proposed QU process?

Applying for a Quarantine Unit

Again the theory seems straightforward however as the detailed guidance and costings are not yet available further comment is impossible. We would endorse the need to make the application system as straightforward and cost effective as possible.

Validation and Allocation of QU CPH Numbers

Six Day Standstill – Consultation on the Introduction of Quarantine Units

Consultation Response to Welsh Government

February 2016

The chain of information appears overtly complicated and hence there are concerns as to how efficient this will prove to be. It is imperative to the perceived success of this scheme that the farmer is not inconvenienced, confused or expected to intervene between the various government departments involved. The farmer's responsibility should be clear concise and unambiguous

Maintaining a QU – 18 Month Re-Approval

For the farming community the 2 critical elements needed in reviewing QU's are time and consistency. Systems should be adopted that provide adequate time for facilities to be re assessing without causing undue inconvenience to the business. We suspect that most farmers who install QU's will begin the process at a time convenient to their normal trading pattern, hence the optimum review period would be bi-annually not every 18 month. Consideration for changing the review period to bi-annually would be a sensible development. However whatever the review period, successful resilient business require certainty and consistency so we must ensure that there is no variation in the standards required between certification bodies and indeed between individual inspectors

QU In Use Inspections

Some have raised security concerns around unannounced inspections. Many rural businesses are by location remote and therefore premises are often vulnerable to theft and therefore routinely try to discourage unannounced visits from suppliers, etc. Members suggest that a visit with short notice is a more appropriate means of inspection.

Question 3 Nature and number of QUs per farm premises - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.

a) Which one of the four options illustrated in pages 22 to 24 do you feel should be considered further (please tick):

The best option will be determined by the individual business structure

b) Are there any other pros or cons that should be included and therefore considered?

None

Question 4 Changes to the Disease Control (Wales) Order 2003 - your views are being sought as to whether you agree or otherwise with the proposed changes.

No comment

Six Day Standstill – Consultation on the Introduction of Quarantine Units

Consultation Response to Welsh Government

February 2016

For further information please contact:

Karen Anthony
Director of Policy Wales
Ty Cymru
Prestegne Enterprise Park
Prestegne, Powys, LD8 2UF

Tel: 01547 317085
Email: karen.anthony @cla.org.uk
www.cla.org.uk

CLA reference (for internal use only)

From: John Edwards <cefnbraich@hotmail.co.uk>

Sent: 16 December 2015 22:53

To: animaldiseases

Subject:QU Consultation

Having read only a few of the first pages of the consultation document I am very aggrieved to see what I presumed to be a step forward to help stockmen/women in a way forward to abolish this totally unnecessary and stupid requirement. Not at all surprisingly welsh government has come up with an even worse system, not only is it obviously unpractical but also completely unworkable. Do they like treating us livestock keepers as idiots and ignoramuses by telling us they have found a way forward only to make it absolutely obvious they have no intention of removing the 6 day rule and just offer us a carrot, cut off both ends, throw away any good bits and leave the rubbish for us to chew on, and as stated above put forward an idea nobody will use. Also on reading some of the typical requirements they require, the 6 days now become seven when day 0 counts as the first day and a further 6 whole days of standstill. A way forward, I think not just an useless document costing a fortune to produce with 99% of us staying exactly as we are. The whole argument for six days was to enable us to move our livestock to market on a weekly basis because most livestock markets are on the same day every week, they don't move around like these people think to facilitate 6 day standstills.

Yours in a very angry mood

John LI Edwards

From: Daniel Roberts <danielpwill@btinternet.com>

Sent: 10 February 2016 15:54

To: animaldiseases

Subject: Six day standstill

Regarding the six day rule, it is imperative you change this system as it is effecting my business . A quarantine system would allow us to buy and sell beef and sheep in the livestock market as we have to use the deadweight system at the moment or we have to wait and sell one week and buy the other this being a disadvantage in the market as some weeks the stock isnt in the markets to buy and trade is down on the selling weeks, a quarantine system would work as this would allow us to trade every week and watch the market trend as the stock stays on farm for over 12 months as give the standstill to the animal and not the holding. Please look into this matter as it is effecting my business and as trade is now , every little helps.

Daniel Roberts

Confidentiality

Responses to consultations are likely to be made public, on the internet or in a report.

If you would prefer your response to remain anonymous, please tick here:

tick

Response Form

Consultation on the proposed introduction of Quarantine Units		
Name	[REDACTED]	
Organisation (if applicable)	[REDACTED]	
Address (include postcode)	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	
Email Address	[REDACTED]	
Telephone	[REDACTED]	
Type (please select by placing a tick next to the appropriate type opposite)	Member of the farming community	tick
	Public Body (Local Authority, Police, Fire and Rescue Services etc.)	
	Professional Body / Interest Group	
	Third Sector (Community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	
	Other (not listed above) please specify below:	

Question 1

To what extent do you agree with the benefit of implementing Quarantine Units to replace the current 6-Day Standstill Rule exemptions?

(Please tick)

Strongly Agree	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Strongly Disagree	<input type="checkbox"/>
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Please provide an explanation for your response below:

The concept is a good one but the implementation and on-going management could add yet another layer of paperwork, inspections and bureaucracy to an already demanding sector.

In many senses if the current system isn't broke then why change it. It appears that this could just become another means of catching the farmer out and creating more administrators jobs.

Question 2

The Proposed Changes - What are your thoughts relating to the proposed QU process?

With reference to the process flows and supporting notes provided on pages 11 to 21 we are interested to hear your views on the proposed process and any areas that you feel have been omitted or are unclear.

Applying for a Quarantine Unit

In theory the process is logical and workable. The debate will evolve around the number of administrators to the number of farmers/applicants, and the ability to use and afford the application form.

Validation and Allocation of QU CPH Numbers

Again a high level of bureaucracy and administrators are shown in the diagrams. Cohesion between departments will be critical.

Maintaining a QU – 18 Month Re-Approval

Movement logs are not new but again the cooperation of a number of groups; EIDCymru, BCMS is going to be vital. Ultimately the applicant could end up being in the process a long time.

QU In Use Inspections

These need to be completed along other inspections already undertaken including those for FABBL or FAWL instead of another inspector to the farm risking the biosecurity of the farms visited.

Question 3

Nature and number of QUs per farm premises - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.

a) Which one of the four options illustrated in pages 22 to 24 do you feel should be considered further (please tick):

(Please tick)

Option 1		Option 2		Option 3		Option 4	
----------	--	----------	--	----------	--	----------	--

Please provide an explanation for your response below:

A difficult one as ultimately Option 4 is the best but a total lack of confidence in the systems and communications would jeopardise the validity of the option. Farmers need to be able to keep different livestock classes separately (pigs, sheep, cattle) including inside and outside, without jeopardising the health both long and short term. However a QU for each plus one in and one outdoor will lead to an expensive and unworkable system.

Before deciding an option more information is required as to the limitations and requirements of a QU.

b) Are there any other pros or cons that should be included and therefore considered?

Complete the table below to provide us with your suggested changes or additional pros or cons for us to consider. Please feel free to either insert more rows (for electronic responses) or continue on a separate sheet (for hard copy responses) if more space is required.

Option	New (N) or Amend (A)	Please describe your suggested change and include your reasoning.
	A	Further to the 4 options regarding the number of QUs further information and guidance is required as to the requirements of a QUs so applicants can have a better understanding of how the proposed options could be implemented.



Dr Hazel Wright, Senior Policy Officer, Farmers' Union of Wales, Llys Amaeth, Plas Gogerddan, Aberystwyth, Ceredigion, SY23 3BT

Tel: 01970 820820
Fax: 01970 820821
E-mail: hazel.wright@fuw.org.uk

Exotic Animal Diseases Team
Office of the Chief Veterinary Officer
The Welsh Government
Cathays Park
CARDIFF
CF10 3NQ

Email: animaldiseases@wales.gsi.gov.uk

11th February 2016

Dear Sir / Madam,

Consultation on the Introduction of Quarantine Units

Thank you for inviting the Farmers' Union of Wales to contribute to the above consultation. Following an internal consultation with its twelve County Branches, the Union submits the following comments for your consideration.

General Comments

Members generally believed that the voluntary use of QUs could be of benefit to some livestock keepers. However, the onerous and burdensome nature of some of the operational requirements may preclude many individuals from establishing such units. There will be far greater uptake where the establishment and operation of a QU is simple and practical, and this will in turn satisfy the vision set out in Gareth William's Working Smarter report.

Members commented that the plethora of current regulations, coupled with the degree to which such regulations can be amended or altered, has led to tremendous confusion and frustration and it is therefore essential that both the CPH review and changes to the 6 day standstill regulation are as simple, transparent, cost-effective and easy to use as possible.

Numerous members commented that the operational rules surrounding QUs were more draconian than those pertaining to isolation facilities and queried whether the current rules pertaining to QUs could be relaxed until confirmation of a disease outbreak.

Question 1: *To what extent do you agree with the benefit of implementing Quarantine Units to replace the current 6-Day Standstill Rule exemptions?*

Members generally agreed with the benefit of implementing QUs to replace the current 6 day standstill rule exemptions. However, concern was expressed regarding the compulsory redundancy of isolation units.

Several respondents queried the costs involved in establishing and maintaining a QU and commented that the QU operational rules were rather stringent and without proper scientific evaluation.

Question 2: *What are your thoughts relating to the proposed QU process?*

2a: Applying for a Quarantine Unit

The FUW notes that ‘QUs must be certified by a Certification Body (CB) accredited by the United Kingdom Accreditation Service (UKAS)’. Several members commented that a certification role should also be offered to the British Veterinary Association in order to increase the choice available to farmers and to foster improved service through competition.

The FUW would seek to ensure that the information and language contained in the guidance on creating a QU (QU supporting notes, pg. 12) is appropriate and ‘farmer-friendly’ in order to avoid costly errors and lengthy delays in the process. It is also essential that the guidance includes appropriate contact information to allow farmers to contact the certification body when queries arise. This is especially important given that any major errors could see the cessation of the application and a requirement for the livestock owner/keeper to pay another fee.

Members believed that farmers should only be required to pay for one accreditation per holding, regardless of how many QUs were in place.

2b: Validation and Allocation of QU CPH Numbers

The Union notes that the Welsh Government has opted for option 2 – separate CPH number allocated for each QU – rather than a tick-box for notification that the QU is in use. The FUW would have preferred to see option 3 retained and would have welcomed an inclusion of this issue within the consultation process. Indeed several members commented that a tick-box on the movement form would have been more than adequate and would have negated the need for separate CPH numbers.

In November last year cattle keepers were informed that the prices paid to them by some abattoirs could be significantly reduced if animals had been moved more than 3 times or had more than 4 residencies. Given the potential implications inherent on the present consultation, members therefore stated that the system in use must be able to distinguish moves into a QU from other livestock movements.

2c: Maintaining a QU – 18 Month Re-Approval

Members noted that QU certification would be required every 18 months and numerous respondents queried the scientific justification for this relatively short time span. Several respondents suggested that 3 years would be a more acceptable time frame for renewal whilst others suggested that accreditation should be for the lifetime of the unit; with inspections providing the mechanisms by which to correct any issues.

2d: QU In Use Inspections

The Union notes that ‘electronic notification of animal movements within 24 hours and individual identification of animals’ would be required to ensure inspections can be carried out on in-use

facilities. The Union would strongly query the need for electronic notification of individual IDs within 24 hours. Such stringent and overly bureaucratic rules do not provide any discernible reduction in disease risk and, as such, it should only be necessary to report (1) that the QU is in use from a given day and (2) the number of animals within the unit. The individual animal identifiers can subsequently be recorded and checked during on-farm inspection. The requirement to keep records of animals' ID and dates of entry and departure from the QU, coupled with the use of unannounced inspections, are sufficient for this process.

Given the above, and the lack of broadband in many rural areas, the Union would like to see other methods of in use notification, such as text messaging to a central number, included in discussions in order to foster ease of use and to minimise bureaucracy. Overly onerous rules and conditions that require access to broadband will inevitably preclude the use of QUs by some individuals. Indeed, given that other important considerations, such as the CPH review, may increase the demand for QUs it is essential that the operational rules and requirements do not prohibit engagement as this would represent a real missed opportunity for the industry. Furthermore, the use of other types of instant notification, such as text messaging, would mitigate any concerns surrounding a potential delay to on-farm inspections.

The FUW notes that the 'APHA will identify the QUs in use and select QUs to undertake unannounced inspections'. The Union believes that the use of unannounced inspections should follow the principles of earned recognition as this represents a proportionate and risk-based approach to compliance.

Several respondents commented that it was essential for producers to be offered sufficient time to rectify any issues that have been brought to light following an inspection.

Members noted the appeals process relating to suspension of a QU following suspected non-compliance and stated that this process must be easy to use, transparent and not cost-prohibitive.

In order to ensure compliance, it would be beneficial for the QU certificate to include a reminder which informs the livestock owner/keeper that they must inform BCMS to register the QU CPH on the CTS system and/or update EIDCymru.

The Union believes that there are a number of overly stringent QU requirements which could be amended without posing any tangible increase in disease transmission risk. For example, the requirement to cleanse and disinfect transporting vehicles when entering and leaving a QU is extremely stringent and represents an unwelcome addition to current standstill regulation. Similarly, expecting livestock keepers to disinfect their clothes or wash their hands when entering or leaving a QU does not distinguish between the varying reasons a QU may be entered. In this case, the same overly bureaucratic rules apply to an individual that has simply observed stock, as it does to a farmer that has handled stock.

The level of disease risk should underpin the requirements and operational rules in order to achieve a more proportionate approach to the use of QUs.

Members noted the requirement to have 'effective separation between quarantined and other animals with stock proof double-fencing at least 3 metres apart' when using an outdoor QU. Several respondents queried this 3 metre separation and added that considerable expense would be required to make this QU a viable option. Members sought clarity on the reasoning behind this distance.

Question 3: *Nature and number of QUs per farm premises - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered. a) Which one of the four options illustrated in pages 22 to 24 do you feel should be considered further (please tick):*

The FUW notes that 4 QU options with ‘suggested pros and cons’ for each have been provided in the present consultation. However, the FUW believes that the options provided remain heavily weighted to management practises which effectively allow for the use of just one QU and the multiple QU options provided are therefore rather restrictive. Despite some increased flexibility under options B and C, only option D truly allows for the use of two QUs which can be entirely managed as separate entities. Option D therefore offers the greatest flexibility for livestock keepers and allows producers adopting QUs the most practical solution to moving different species or sexes of animals at the same time.

The FUW was disappointed to note the list of ‘cons’ associated with option D. The benefits gained by those producers whose management practises would benefit from two such distinct units – such as those attending shows or pedigree breeders - could far outweigh the ‘complications’ listed under this section. Indeed, the pros and cons listed are too simplistic and do not properly recognise the balance between the benefits gained and the potential for increased ‘complications’. Furthermore, moves to streamline the bureaucracy and red-tape associated with 2 distinct QUs would reduce complexity and would therefore be welcomed.

3b: Are there any other pros or cons that should be included and therefore considered?

Members noted this section of the consultation and no further responses were forthcoming.

Question 4: *Changes to the Disease Control (Wales) Order 2003 - your views are being sought as to whether you agree or otherwise with the proposed changes. a) To what extent do you agree with the proposed changes set out in pages 25 - 33?*

Members noted this section of the consultation and no responses were forthcoming.

I trust due consideration will be given to the preceding information.

Yours

A handwritten signature in black ink, appearing to read 'Hazel Wright', with a stylized flourish at the end.

Dr Hazel Wright
Senior Policy Officer

Confidentiality

Responses to consultations are likely to be made public, on the internet or in a report.

If you would prefer your response to remain anonymous, please tick here:



Response Form

Consultation on the proposed introduction of Quarantine Units		
Name	[REDACTED]	
Organisation (if applicable)		
Address (include postcode)	[REDACTED] [REDACTED] [REDACTED]	
Email Address		
Telephone		
Type (please select by placing a tick next to the appropriate type opposite)	Member of the farming community	<input checked="" type="checkbox"/>
	Public Body (Local Authority, Police, Fire and Rescue Services etc.)	<input type="checkbox"/>
	Professional Body / Interest Group	<input type="checkbox"/>
	Third Sector (Community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	<input type="checkbox"/>
	Other (not listed above) please specify below:	<input type="checkbox"/>

Question 1

To what extent do you agree with the benefit of implementing Quarantine Units to replace the current 6-Day Standstill Rule exemptions?

(Please tick)

Strongly Agree		Agree	<input checked="" type="checkbox"/>	Disagree		Strongly Disagree
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Please provide an explanation for your response below:

AGREE WITH RESERVATIONS.
IN THE PROPOSAL ON PAGE 8,
THERE IS NO MENTION TO MOVING
ANIMALS IN AND OUT OF AN UNIT
FOR A SALE, IF I DON'T GET
A DECENT PRICE ON A SALE DAY,
I'D WANT TO BRING THEM HOME
+ TRY ANOTHER SALE IN A FEW DAYS,
UNLESS THE CHIEF VET CAN GIVE
ME REASONS HOW/WHY THE DISEASE
RISK FROM MOVING BETWEEN A SALE +
SHOW IS DIFFERENT WHY CANT IT
BE BOTH? IN MY OPINION THE NOSE
TO NOSE CONTACT WOULD BE THE
SAME

Question 2

The Proposed Changes - What are your thoughts relating to the proposed QU process?

With reference to the process flows and supporting notes provided on pages 11 to 21 we are interested to hear your views on the proposed process and any areas that you feel have been omitted or are unclear.

Applying for a Quarantine Unit

Validation and Allocation of QU CPH Numbers

Maintaining a QU – 18 Month Re-Approval

QU In Use Inspections

Question 3

Nature and number of QUs per farm premises - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.

a) Which one of the four options illustrated in pages 22 to 24 do you feel should be considered further (please tick):

(Please tick)

Option 1		Option 2		Option 3		Option 4	✓
----------	--	----------	--	----------	--	----------	---

Please provide an explanation for your response below:

MAKE THINGS PRACTICAL FOR
SHEEP + BEEF FARMERS.

b) Are there any other pros or cons that should be included and therefore considered?

Complete the table below to provide us with your suggested changes or additional pros or cons for us to consider. Please feel free to either insert more rows (for electronic responses) or continue on a separate sheet (for hard copy responses) if more space is required.

Option	New (N) or Amend (A)	Please describe your suggested change and include your reasoning.
	PAGE 35	24 HR REPORTING IN I AGREE WITH. 24 HR REPORTING OUT
		I DONT AGREE - WHY REPORT OUT IN 24 HRS? - ARE YOU
		GOING TO CHECK, THE HAVE MOVED OUT?

Question 4

Changes to the Disease Control (Wales) Order 2003 - your views are being sought as to whether you agree or otherwise with the proposed changes.

a) To what extent do you agree with the proposed changes set out in pages 25 - 33?

(Please tick)

Strongly Agree		Agree		Disagree		Strongly Disagree	
----------------	--	-------	--	----------	--	-------------------	--

b) If you disagree or wish to provide any further comments please complete the table below.

Please feel free to either insert more rows (for electronic responses) or continue on a separate sheet (for hard copy responses) if more space is required.

Ref No.	Your views



Our ref: GH/KH/Cons.

12 February 2016

Exotic Animal Diseases Team
Office of the Chief Veterinary Officer
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Ty Rheidol
Parc Merlin
Aberystwyth
Ceredigion
SY23 3FF

Tel: 01970 625 050

Fax: 01970 615 148

Email: info@hccmpw.org.uk

www.hccmpw.org.uk

E-mail: animaldiseases@wales.gsi.gov.uk

Dear Sirs

Re: Consultation on the Introduction of Quarantine Units

Thank you for the opportunity to comment on the proposals to introduce quarantine units as an exemption to the current six day standstill arrangements for cattle, sheep and goats.

Hybu Cig Cymru – Meat Promotion Wales (HCC) is the strategic body responsible for the development, marketing and promotion of the Welsh red meat industry. Its mission is to develop profitable and sustainable markets for Welsh Lamb, Welsh Beef and pork from Wales.

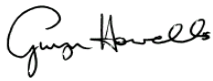
HCC recognises the importance of biosecurity measures, including standstill rules, in protecting our livestock and is generally supportive of the proposals that will simplify existing rules and provide more flexibility to movements for trade whilst maintaining the industry's ability to mitigate against the risk of spreading animal diseases. Sheep and beef farms in Wales span a wide range of hill, upland and lowland locations and have very different individual requirements and handling facilities. We therefore support options that offer maximum flexibility in terms of the nature and number of quarantine units per farm so that each farmer has the opportunity to utilise the best mechanism for their individual business model and circumstances.

We are however concerned that, despite the intentions to simplify the six day standstill arrangements, the requirements for compliance and the costs associated with certification and renewal of Quarantine Units may be a significant barrier for many farmers in Wales from taking up the option. Inspections for on farm isolation units (for shows), Sole Occupancy Authorities and multiple pick ups have, in the past, been undertaken by the farmer's own vet as an Official Veterinarian. Veterinarians would not only be well placed to carry out these inspections but it would provide a valuable opportunity for the farm veterinarian to review and update flock/ herd health plans, to provide up to date advice on biosecurity and disease prevention and facilitate the dialogue and relationship between the farmer and the veterinarian to enhance health, welfare and performance. We would therefore strongly encourage the consideration of veterinarians providing this inspection service.

HCC also notes the industry discussions and concerns surrounding the requirement for 24 hour reporting of movements into Quarantine Units. Whilst accepting that some localities in Wales cannot currently access broadband or mobile data facilities, the availability of online movement reporting through EIDCymru does provide a mechanism that could enable farmers to report movements quickly and easily. The increasing availability of broadband and of online access via mobile networks and smartphone applications means that this capability is likely to increase in future years.

We hope that these comments are useful in your deliberations and we would appreciate being kept informed of any further developments in this area.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Gwyn Howells', with a stylized, cursive script.

Gwyn Howells
Chief Executive

Consultation Response Form

Consultation on the Introduction of Quarantine Units.

The Welsh Government is inviting your views on the introduction of Quarantine Units to provide exemptions to the current 6-Day Standstill arrangements for cattle, sheep and goats.

This consultation has been issued to capture views from all interested stakeholders, the public, industry and the farming community.

Please submit your comments by 12 February 2016.

DATA Protection

Any response you send us will be seen in full by the Welsh Government staff dealing with the issues covered in this consultation. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Confidentiality	
Responses to consultations are likely to be made public, on the internet or in a report.	
If you would prefer your response to remain anonymous, please tick here:	<input type="checkbox"/>

Response Form

Consultation on the proposed introduction of Quarantine Units		
Name	MELINA JONES	
Organisation (if applicable)		
Address (include postcode)	1 Ailwyn Bwlchgwyn Wrexham LL11 5YF	
Email Address	janeyj@hotmail.co.uk	
Telephone	07952127354	
Type (please select by placing a tick next to the appropriate type opposite)	Member of the farming community	
	Public Body (Local Authority, Police, Fire and Rescue Services etc.)	
	Professional Body / Interest Group	
	Third Sector (Community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	
	Other (not listed above) please specify below:	✓
	I keep goats for own use & showing, sale of young stock	

Question 1

To what extent do you agree with the benefit of implementing Quarantine Units to replace the current 6-Day Standstill Rule exemptions?

(Please tick)

Strongly Agree		Agree		Disagree		Strongly Disagree	✓
----------------	--	-------	--	----------	--	-------------------	---

Please provide an explanation for your response below:

The proposal replaces current Isolation units which are used extensively by show goers

There ~~is~~ ^{will be} now, a cost associated with keeping the facility e.g. re-inspection / approval.

Keep the Isolation facilities for small farmers & hobby farmers to reduce cost.

Failure to do this will mean show numbers drop as exhibitors cannot support all local shows. This will lead shows closing & yet another Country pursuit becoming extinct.

Question 2

The Proposed Changes - What are your thoughts relating to the proposed QU process?

With reference to the process flows and supporting notes provided on pages 11 to 21 we are interested to hear your views on the proposed process and any areas that you feel have been omitted or are unclear.

Applying for a Quarantine Unit

Too complicated - use the isolation unit process .

Validation and Allocation of QU CPH Numbers

Keep current no & once approved ~~change~~ add QU to current holding no to keep the association .

Maintaining a QU – 18 Month Re-Approval

This should be free

QU In Use Inspections

These should be free @ not all animal owners will be available (I work full time) Inspectors will need to work shifts.

Question 3

Nature and number of QUs per farm premises - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.

a) Which one of the four options illustrated in pages 22 to 24 do you feel should be considered further (please tick):

(Please tick)

Option 1	<input type="checkbox"/>	Option 2	<input type="checkbox"/>	Option 3	<input type="checkbox"/>	Option 4	<input type="checkbox"/>
----------	--------------------------	----------	--------------------------	----------	--------------------------	----------	--------------------------

Please provide an explanation for your response below:

use isolation units don't change system

b) Are there any other pros or cons that should be included and therefore considered?

Complete the table below to provide us with your suggested changes or additional pros or cons for us to consider. Please feel free to either insert more rows (for electronic responses) or continue on a separate sheet (for hard copy responses) if more space is required.

Option	New (N) or Amend (A)	Please describe your suggested change and include your reasoning.
		Use current Isolation units don't create yet more hoops to jump through.
		STOP SPENDING MONEY UNNECESSARILY!
		You will stop small sized Farmers going about their business
		Retain Isolation units.

Question 4

Changes to the Disease Control (Wales) Order 2003 - your views are being sought as to whether you agree or otherwise with the proposed changes.

a) To what extent do you agree with the proposed changes set out in pages 25 - 33?

(Please tick)

Strongly Agree		Agree		Disagree		Strongly Disagree	✓
----------------	--	-------	--	----------	--	-------------------	---

b) If you disagree or wish to provide any further comments please complete the table below.

Please feel free to either insert more rows (for electronic responses) or continue on a separate sheet (for hard copy responses) if more space is required.

Ref No.	Your views
10	This will only work if the same animals are shown. This is not workable with animals which are added to showing entries.
16	Returning from show stock is considered incoming on 6 days. what happens if you add another animal from the main holding?
19.	This is unworkable for goats. as owners bring goats on the day following 6 day quarantine.
	↳ it creates additional cost & restricts nos of does that can be served
	↳ affects billy revenue + will discourage breeders offering the service

Confidentiality

Responses to consultations are likely to be made public, on the internet or in a report.

If you would prefer your response to remain anonymous, please tick here:

☐**Response Form**

Consultation on the proposed introduction of Quarantine Units		
Name	Christopher Mallon	
Organisation (if applicable)	National Beef Association	
Address (include postcode)	The Mart, Hexham, Northumberland	
Email Address	chris@nationalbeefassociation.com	
Telephone	07579009648	
Type (please select by placing a tick next to the appropriate type opposite)	Member of the farming community	
	Public Body (Local Authority, Police, Fire and Rescue Services etc.)	
	Professional Body / Interest Group	x
	Third Sector (Community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	
	Other (not listed above) please specify below:	

Question 1

To what extent do you agree with the benefit of implementing Quarantine Units to replace the current 6-Day Standstill Rule exemptions?

(Please tick)

Strongly Agree	<input checked="" type="checkbox"/>	Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Strongly Disagree	<input type="checkbox"/>
----------------	-------------------------------------	-------	--------------------------	----------	--------------------------	-------------------	--------------------------

Please provide an explanation for your response below:

The NBA agree with the reasons you have already given that the rules are no longer fit for purpose. The removal of the 6DSS will help trade and remove a regulatory burden that is out dated.

The present system is complicated and this leads to farmers inadvertently being non-compliant.

The use of an on farm quarantine unit makes a practical alternative to the 6DSS and it is good to see that Wales is leading the way with these important changes.

Question 2

The Proposed Changes - What are your thoughts relating to the proposed QU process?

With reference to the process flows and supporting notes provided on pages 11 to 21 we are interested to hear your views on the proposed process and any areas that you feel have been omitted or are unclear.

Applying for a Quarantine Unit

The flow seems to be self explanatory and comprehensive.

A dummy run of the process would high light any areas that require improvement.

Validation and Allocation of QU CPH Numbers

Once again it is comprehensive.

Maintaining a QU – 18 Month Re-Approval

This seems to flow well and is easy to follow.

QU In Use Inspections

Question 3

Nature and number of QUs per farm premises - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.							
a) Which one of the four options illustrated in pages 22 to 24 do you feel should be considered further (please tick):							
(Please tick)							
Option 1		Option 2	x	Option 3		Option 4	
Please provide an explanation for your response below:							
<p>This option (option 2) seems to give the best combination of flexibility with the least burden of reporting. Option D of course allows for the greatest flexibility but in practice could be very messy to control.</p>							

b) Are there any other pros or cons that should be included and therefore considered?

Complete the table below to provide us with your suggested changes or additional pros or cons for us to consider. Please feel free to either insert more rows (for electronic responses) or continue on a separate sheet (for hard copy responses) if more space is required.

Option	New (N) or Amend (A)	Please describe your suggested change and include your reasoning.

Question 4

Changes to the Disease Control (Wales) Order 2003 - your views are being sought as to whether you agree or otherwise with the proposed changes.

a) To what extent do you agree with the proposed changes set out in pages 25 - 33?

(Please tick)

Strongly Agree		Agree	x	Disagree		Strongly Disagree	
----------------	--	-------	---	----------	--	-------------------	--

b) If you disagree or wish to provide any further comments please complete the table below.

Please feel free to either insert more rows (for electronic responses) or continue on a separate sheet (for hard copy responses) if more space is required.

Ref No.	Your views

To:	animaldiseases@wales.gsi.gov.uk	Date:	11 th February 2016
		Ref:	
Circulation:		Contact:	Dylan Morgan
		Tel:	01982 554200
		Fax:	
		Email:	Dylan.morgan@nfu.org.uk

NFU Cymru Response: Welsh Government Consultation Document

Consultation on the Introduction of Quarantine Units

NFU Cymru welcomes the opportunity to respond to the Welsh Government Consultation on the Introduction of Quarantine Units.

A simplification of the complex and confusing rules surrounding livestock movement recording and reporting is long overdue and has been a key lobbying aim for NFU Cymru for the past 15 years. Our responses to numerous red tape reviews, NAW inquiries and WG consultations have consistently focussed on the following key points:-

- There is much confusion amongst farmers and regulators with regards to the complex rules surrounding sheep and cattle movements. Examples of these include the 5 mile rule for sheep, sole occupancy authorities, BCMS linked holdings and how they interlink. For example whilst you may have registered a SOA (via APHA) to allow movements between holdings in your ownership so as not to be subject to 6 day rule restrictions unless you have also notified BCMS that you also want to link these holding you will fall foul of the regulations (and vice versa). Separate rules for cattle and sheep also cause confusion, for example you may need a separate holding number to record and report sheep movements between two blocks of land you own but this holding number or reporting requirement will not be relevant for cattle.
- The different types of holding numbers and their exact purposes are complicated and confusing e.g. you have ordinary CPH numbers (County / Parish/Holding) but you also have 3000, 5000, 9000 numbers etc.
- NFU Cymru would like to see a simplification of the rules with one CPH covering one epidemiological unit. Moves within this unit would not be subject to the 6 day rule and would not need to be recorded or reported. One rule for Cattle and Sheep.
- There should be a simple and easy way to add and remove land from your epidemiological unit.
- We would like to see the implementation of the extended use of isolation facilities. This would allow farmers to purchase animals put them in an isolation unit but still sell animals from the rest of the holding. Rules around isolation units / fields should be practical, they should be self-certifiable and checked at other inspections e.g. Farm assurance, CIR, cross compliance inspections.
- Sheep farmers must be able to continue with the ability to batch record sheep movements where the ownership of animals does not change e.g. to tack and home.



Whilst NFU Cymru is frustrated that we are nearly 10 years on from the publication of the Madders Review of Livestock Movement Controls where the concept of Isolation Units was first presented to WG and similarly we are 4 years on from Gareth Williams' Working Smarter report that recommended this should be a "quick term" win for WG we are pleased that the industry now has an opportunity to respond to this consultation on the introduction of Quarantine Units. We very much hope that the introduction of Quarantine Units with practical and workable rules and conditions can now be progressed and implemented without further delay.

Before answering the consultation questions it is important to highlight that the 6-day standstill rule remains one of the most unpopular regulations amongst our membership. Standstill rules were brought in as a result of the 2001 Foot and Mouth Outbreak (FMD). Our members remain firmly of the view that the focus of Government should be on stopping the incursion of diseases such as FMD into this country by stringent border checks and controls. If there is any sign that FMD has entered the country then an immediate standstill should be placed on all animal movements. Our members believe this approach to be more robust and proportionate as opposed to a standstill rule in operation on every farming business in 'peacetime'.

Question 1 – To what extent to you agree with the benefit of implementing Quarantine Units to replace the current 6-Day standstill rule exemptions?

As we have already highlighted NFU Cymru believes that the introduction of Quarantine Units with practical and sensible conditions attached to them is an essential element of a wider package of measures to simplify the current complicated and confusing livestock movement rules. This simplification would bring about a greater understanding of the rules for livestock movement reporting and recording requirements and thus deliver a more robust disease management / control regime.

The Gareth Williams Working Smarter report of December 2011 covered the 6 day standstill rule within paragraphs 8.7 to 8.11. NFU Cymru would contend that all the issues highlighted within these paragraphs with regards to the very complex set of rules, different rules for certain classes of livestock and this being a badly damaged rule still stand today. Gareth Williams highlighted that this regulation cannot be looked at in isolation, as it is part of an interrelated group of regulations that includes animal identification, holding identification and movement tracking. The other elements of the Working Smarter package have or are in the process of being implemented. Genuine simplification and a robust disease control regime can only be fully achieved once the full package of measures has been implemented.

Whilst we have welcomed the proposals within the recent WG consultation document with regards to CPH rationalisation the full benefits of this rationalisation in terms of simplifying livestock movement reporting and recording, maintaining the ability to trade and maximise returns from the market at the same time as ensuring robust disease control strategies can only be achieved if concurrent to this process livestock keepers have the ability to implement Quarantine Units on their holding. Failure to achieve this will see livestock keepers reluctant to fully engage in the CPH rationalisation programme or face increased barriers to trade.

Question 2 – What are your thoughts relating to the proposed QU process?

Prior to commenting on the proposed QU process NFU Cymru have some comments that they wish to make with regards to Part B - The proposed changes.

NFU Cymru is generally supportive of the QU principles, requirements and operational rules and believes that these can form the outline of the guidance notes that will be produced for the QU's. What will be absolutely crucial is ensuring the details of the guidance rules are practical, sensible and achievable on farm.

We do question the need for *Electronic notification of animal movements within 24 hours* **and individual identification of animals** would be required to ensure inspections can be carried out on in-use facilities. Whilst we respect the need for APHA to know when the unit is in use so that they can plan potential inspection visits we feel that all that should be required within 24 hours is notification that the QU is in use not the individual identification of the animals within the QU. This would be a simpler system as notification could be carried out very quickly and simply, possibly even by text message.

Effective separation – We fully agree that the QU unit should provide effective separation between quarantined and other animals and that procedures must be in place to ensure dedicated access, feeding and effluent management. However we do not believe that the detailed rules need to be overly prescriptive e.g. by setting out that stock proof double fencing must be at least 3 metres apart. NFU Cymru believes that it is more important that the applicant shows how separation, feeding and effluent management is achieved rather than a complex and prescriptive set of rules / measurements etc.

Dedicated Clothing, gloves and footwear – We believe that this should be appropriate to the task in hand, i.e. the type of clothing required to carry out a walk through a field of sheep in an outdoor QU to check that they are all okay will be entirely different to that required to dose, inject and scan the same group of sheep.

Inspections – The consultation does not cover what percentage of QU's will be inspected in use or the matrix for deciding who and when to inspect. This needs to be made available as soon as possible.

We remain of the view that in the interests of better regulation / earned recognition if other regulatory organisations e.g. RPW, Trading standards, UKAS accredited bodies visit a farm with a QU during the course of their work and they note that the QU is in use then they can carry out an inspection and report their findings to APHA, this could be recorded and used as part of the risk assessment to determine future inspection visits. That is, if the inspection found that the QU was in operation and well run then this should reduce the need for APHA to visit that premise imminently, thus ensuring better targeting of inspection visits.

This Consultation in general and the flow processes on page 11-21 does appear to be overly focussed on ensuring that procedures are in place to ensure that in-use inspections can be completed. We do feel that this tends to imply a lack of trust, on behalf of government, as to the ability of the certification body and the industry to certify and adhere to QU rules.

Costs – NFU Cymru would highlight the need to ensure that all organisations involved in the implementation of QU's efficiently manage their work streams to ensure that costs are kept to the minimum required. As previously highlighted we believe that they are opportunities to streamline the process and ensure that QUs are inspected as part of existing inspections. The 18 month re-approval process has specifically been agreed to ensure that it ties in with farm assurance inspection visits and all efforts must be made to ensure that these visits can be co-ordinated.

With reference to the process flows and supporting notes provided on pages 11 to 21 we are interested to hear your views on the proposed process and any areas that you feel have been omitted or are unclear.

Applying for a Quarantine Unit

The key point for each and every process flow from page 11 to 21 is to ensure that strict timetables are in place to ensure that deadlines are met and that the procedure for the farmers is not overly bureaucratic or burdensome. All the process flows involve interaction between Government, Government agencies and Certification bodies. History tells us that this can sometimes result in a lack of communication and delays. We seek assurance that WG, BCMS, APHA, EID Cymru and the Certification Body will all be working in unison and that the Livestock owner / keeper will not face delays or additional burdens as a result of a failure of these organisation to work together and share data in a timely fashion. Each process flow on pages 11-21 must have a clear timeline within which the relevant bodies must be targeted to achieve their action to prevent delays being introduced into the system, many of the processes can be achieved in tandem.

Validation and Allocation of QU CPH numbers

The points made in the previous paragraph are equally as valid to this process.

Maintaining a QU – 18 month re-approval

The points made above are equally valid to this section. This should be a simple and low cost process for the livestock keeper / owner, tied in with farm assurance re-approval for those farmers who are also members of a farm assurance scheme.

QU In use inspections

We would wish to see clear timelines set to ensure swift and speedy resolutions to in-use inspection issues. If a Tribunal is set up then it is vital that Tribunal members have a good practical knowledge of livestock keeping, livestock reporting and recording rules and Quarantine Units.

Step 14 – NFU Cymru is firmly of the view that the in cases of non-compliance found at step 14 that the temporary removal of the QU until the non-compliance is rectified is sufficient penalty for the livestock keeper, this will be a sufficient safeguard to ensure a robust adoption of the rules on farm.

Animals leaving a Quarantine Unit – NFU Cymru would suggest that the livestock keeper should not need to report animals leaving the Quarantine Unit once the period of quarantine for the group(s) of animals have been completed. We would suggest that an automatic process can be set up via EID Cymru / CTS that reports the movement of animals into the main flock / herd. This would be an excellent example of better regulation and maximising the benefits of electronic reporting processes.

Question 3 – Nature and number of QUs per farm premises – your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.

- a) Which one of the four options illustrated in pages 22 to 24 do you feel should be considered further.
- b) Are there any other pros and cons that should be included and therefore considered?

NFU Cymru believes that the maximum flexibility should be allowed for the livestock industry. Whilst we can see that the majority of farmers would avail themselves of one QU on their farm which could comprise of one or two separate sites operating as one unit (option B), there will be some farmers who would require two QUs on their farm with separate CPH numbers and for both to be in use at the same time. It seems eminently sensible that one Quarantine Unit per species should be allowed. It is important to remember the diverse nature of livestock farming businesses across Wales with many farmers having different enterprises running on different sites but which under the new CPH rules will all be operating under one CPH unit. In these instances farmers may well wish to have separate QU's for separate sites and this would be the most appropriate solution for a number of reasons.

NFU Cymru fully respects that those farmers operating under the Option D scenario would face additional cost and that the inspection frequency for the units would increase but this should be a decision for the keeper to make and not for regulation to dictate.

Question 4- Changes to the Disease Control (Wales) Order 2003 – your views are being sought as to whether you agree or otherwise with the proposed changes.

- a) To what extent do you agree with the proposed changes set out in pages 25-33?
- b) If you disagree or wish to provide any further comments please complete the table below?

The changes proposed appear sensible.

Other Comments

NFU Cymru has a number of further comments to make which have not been addressed as part of the questions within the consultation document.

How the proposals was developed

As the Working Smarter report correctly points out at para 8.7 the six day standstill rule is by far the most disliked regulation and was thus always going to stir up strong views from industry of the need for radical change and from OCVO to maintain current rules. That said Gareth Williams came up with a sensible middle ground that proposed the introduction of isolation units for all categories of sheep and cattle alongside a range of other changes to animal ID and movement rules. We are disappointed that it has taken 4 years for WG to finally consult on this recommendation. We would stress the importance of now moving forward at a pace to make up for lost time to ensure that no more time is delayed with the implementation of quarantine units.

Business Case options – NFU Cymru would like to put on record that we remain of the view that Option 3 – *Introduction of a general standstill exemption for farms using QU. A QU will be part of a CPH. Tick-box for notification that QU is in use* remains very much our favoured option for the implementation of QU's in Wales. We believe that this would fit in with the CPH rationalisation programme. WG Ministers have decided not to pursue option 3 and instead have agreed to take forward Option 2- *Introduction of general standstill exemptions for farms using QU. Separate CPH number allocated for each QU*. Now that this decision has been made industry stakeholders have suggested ways that the electronic notification reporting system can be designed to make it as simple as possible for farmers to be able to report moves into a QU, we hope that these will be pursued and that industry stakeholders will be invited to play a part in designing the system.

Workshops (Page 35) – Whilst industry has had the opportunity to discuss Quarantine Units at every meeting of LIDAG our representation at the workshops was severely restricted. NFU Cymru is disappointed that industry stakeholders were unable to have a greater input into these workshops. We believe that the model of Government and industry working together on the development of RPW Online should have been replicated in the development of QU's.

CPH Project (Page 36) – As already highlighted we would agree with the comments made at page 36 that the CPH project and the implementation of QU's are interlinked. We would also agree that the QU, EID Cymru and CPH projects together will provide a robust system for tracing livestock; they will provide a simpler system that will benefit farmers and regulators alike.

Conclusion

NFU Cymru welcomes the opportunity to respond to this consultation paper and hope that WG will take our comments on board; we hope to be able to continue to participate in the development of this

work through the LIDAG group and any other opportunities that arise. The success of this project will be dependent on the simplicity and practicality of scheme rules. The WG has highlighted *the implementation of QUs as an alternative to the six day standstill and that the proposed changes are designed to simplify current systems, establish consistent rules across species and reduce the administrative burden on farmers without compromising biosecurity*. NFU Cymru concur fully with that statement, the challenge now is to ensure that this is achieved for farmers in Wales. It is now imperative that the necessary work is completed and legislative changes are made to ensure that farmers are able to have approved Quarantine Units on farm by December 2016.

****END****



Exotic Animal Diseases Team
Office of the Chief Veterinary Officer
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

January 22nd 2016

Dear Sir/Madam,

Consultation on the Introduction of Quarantine Units (QUs)

Thank you for consulting Natural Resources Wales on the proposed introduction of a general standstill exemption for farms using Quarantine Units. Natural Resources Wales works as a regulator, partner and advisor to businesses, non-governmental organisations, Local Authorities and communities to help deliver Welsh Government and European Union policies and priorities. Our purpose is to ensure that the environment and natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.

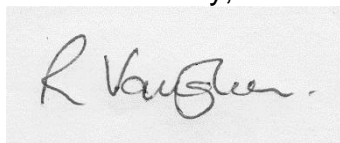
We acknowledge that the introduction of quarantine units provides livestock managers with greater clarity and an additional option to minimise the impact of animal disease outbreaks on the environment whilst giving them flexibility to trade. However, we are concerned that problems with farm manure, washings into rivers, incorrect drainage connections and surface water runoff and poaching may occur and could potentially damage the environment without sufficient best practice guidance and support – particularly around the requirement for separate effluent management.

As a regulator we are responsible for the protection of habitats and endangered species and we are the competent authority for the implementation of the Water Framework Directive in Wales. We have a duty to ensure that the requirements of Environmental Permitting Regulations, the UK Air Quality Strategy, the Countryside and Rights of Way Act and the Natural Environment and Rural Communities Act are met.

Given our remit, we would welcome the opportunity to meet with WG to discuss and advise on the content of best practice guidance and other documents, prior to publication. Our advice would cover the protection and sustainable use of habitats, species, water, soil, landscape and public access.

If you have any questions about our response or require further information, please contact Buddug Jones (contact details are at the top of the letter).

Yours sincerely,

A rectangular box containing a handwritten signature in dark ink. The signature appears to be 'R Vaughan' written in a cursive, flowing style.

Robert Vaughan

Sustainable Land, Farming and Forest Management

NSA response to Welsh Govts consultation on the introduction of quarantine units

Consultation Questions

1. *To what extent do you agree with the benefit of implementing Quarantine Units (QU) to replace the current 6-Day Standstill Rule exemptions?*

We agree fully with the principle of offering the use of quarantine units as an alternative to the current 6 day standstill requirements. We do not see them as being simply a replacement to the standstill *exemptions* but as an alternative to the standstill requirements for those who choose to adopt them.

From a point of principle the NSA wants to see improved disease control and biosecurity measures employed on sheep farms generally. This is in order to reduce disease spread and thereby losses and costs, to improve the welfare and health status of the welsh sheep flock generally, and with the likelihood that it will improve profitability and the success of the industry. However we also strongly believe that the existing nature of an essentially land based enterprise, sheep farming, with its diversity of breeds and systems, and diversity of farm types and market options, is essential. Our sheep farming structure and its diversity is the foundation of the industry, its image is based upon its structure, and there are many positive environmental and social outcomes that are dependent. Therefore we are convinced that quarantine unit proposals **MUST fit around, and support the system of sheep farming, rather than the system of farming fitting around the best theoretical practice for disease control. Our view is that if quarantine units are straightforward and practical then the uptake will be higher than if their requirements were to be unachievable. With a high level of uptake we believe a far greater understanding and buy in to disease control and biosecurity could be achieved. If QU requirements are set at a level that aims to give almost total sterility then we will lose the opportunity to engage a high number of welsh sheep farmers with improved disease control.**

The current 6 day standstill controls are heavily influenced by Foot and Mouth disease. While we understand the need to control such exotic diseases we feel that such a general standstill during F&M 'peacetime' is not well targeted and that there are bigger gains to be made from understanding the value of quarantining stock for more endemic diseases such as scab, foot infections, and in particular internal parasite that may be resistant to current treatments. Through effective disease surveillance we should know when we in the UK , or indeed Wales, is at high risk and we believe industry would accept the raising of controls in these high risk times, including of course in the case of an actual disease outbreak. Our disease strategies should be based on risk.

In particular we would bring attention to the recommendations of the Working Smarter Group. *"The issues around the 6-day standstill rule must be addressed and resolved by the Welsh Government and the farming industry working together. All options must be considered including the Macdonald modelling on separation and isolation facilities, farm-to-farm movements and also the Scottish Government's approach. Solutions must permit efficient cross border movements and be easily understood by farmers."* We note that the recommendations talk about separation and isolation, and not quarantine. Separation and isolation are terms we believe are proportionate to managing disease in a farm situation. Quarantine is often considered to be another, more official level.

While we accept, for a number of reasons, why the retention of the standstill alongside the proposed quarantine units is probably desirable, our ultimate goal should be to have measures that control endemic disease (separation and isolation, and also risk based testing and screening dependant on source of stock), and measures to control exotic diseases **AS AND WHEN** they are deemed to be an actual risk. Global disease surveillance should be seen as an important tool for this and in our opinion the industry would accept standstill closures or periods based on agreed risk.

2. The Proposed Changes - What are your thoughts relating to the proposed QU process?

We accept the principle of there being two options 1) the use of a quarantine unit, or 2) reversion to 6 day standstill requirements.

We do not agree with the justification for the use of the term quarantine over isolation or separation. Please see comments at the end of section 1 above. We believe striving for too high a degree of separation will discourage many farmers from taking reasonable disease isolation facilities on their farms.

QU principles (bullet points as per consultation document, NSA responses in bold text):

- An exemption to standstill rules for farms with approved QUs will replace all existing exemptions involving Sole Occupancy Authorities (SOAs) and isolation units. **NSA response The current exemptions do not require such a high level of quarantine management as is being proposed and the result of this will be that many small farms and those with showing and pedigree sales interests will be forced to increase their standards when they are at least currently involved in isolation practices. If the rules are imposed as set out in the consultation it will add extra burden and bureaucracy on small units that only operate with one CPH number, some of these farms already operate under the current rules very effectively and in most cases during the breeding sale season it is the only way they can run their business around the 6DSS. The unintended consequences of this decision need to be considered seriously and it could reduce biosecurity outcomes.**
- Livestock owners/keepers will be able to choose between using QUs or adhering to the current 6DSS. **NSA response We are happy with farmers being given an option involving these two options – but we feel strongly that the requirements for QUs need to be practical and achievable for the majority – otherwise little progress will be made in encouraging improved industry wide biosecurity and disease control.**
- QUs could be indoor and/or outdoor facilities and must be separate from other animals, with separate feed, water, double fencing and access. **NSA response we agree that QUs could be both indoor and outdoor and also that any one**

farm could have both facilities. A greater deal of interpretation needs to be made over feed and water – we agree that feeding access should not be shared, and for water we again feel that access to water should be separate rather than any need for separate supplies. We accept double fencing, adequate to prevent nose to nose contact. There also needs to be flexibility over which buildings and fields can be used for QUs as a farmer may have to change a field for instance if weather conditions change suddenly. Clarification is needed as to whether the unit can operate all year round for sale stock or just from 1st August to 3^{1st} October which is in the current rules.

- Strict biosecurity and practical requirements must be met in order to prevent the spread of disease. **We agree but these should be risk based (using surveillance information) and proportionate to that risk. Please see our replies to above points as the requirements need practical.**
- QUs must be certified by a Certification Body (CB) accredited by the United Kingdom Accreditation Service (UKAS) that would be accessible for all livestock owners/keepers to apply to. **We agree provided that the certification of QU's can be independent and unrelated to farm assurance if so wished**
- Approval would be required before they can be certified for use and every 18 months thereafter, paid for by livestock owners/keepers. **We agree with the principle of this proposal, however, to make QUs more attractive the cost of the inspection needs to be realistic especially if small producers are to be encouraged to take this option up.**
- No changes are proposed for 20 day standstill rules for pigs, at the request of the pig industry and in consideration of the risks. **No comment**
- Electronic notification of animal movements within 24 hours and individual identification of animals would be required to ensure inspections can be carried out on in-use facilities. **We agree with the need for reporting to allow spot inspections to take place while animals are still present in a QU. However, electronic notification within 24 hours will not be possible as many areas still have little or no broadband connection. A telephone/text service should be offered or a postal service of up to 3 days. Some local shows will process the movement licence for the exhibitors sending in the white part of the ALM1 and this is achieved within the current 3 days. For example a show on a Saturday will have all forms sent off on the Monday this may in time be done electronically with the biosecurity officer at the show acting as an agent for the exhibitors. Most small shows are the heart and soul of a rural community and also encourage new exhibitors to take part; if extra obstacles are put in some shows will not survive.**

QU requirements (bullet points as per consultation document, NSA responses in bold text):

- An indoor QU facility should consist of a separate building and/or field, with its own dedicated access, effluent management, feeding and welfare arrangements.

There should be no direct contact with other animals on the farm. **NSA response we do not agree with the need for a separate building provided the requirements for a field based QU could be met. We accept dedicated access provided this means access dedicated for the QU that is devoid of other livestock. It would be helpful to discuss specific farm situations to get agreement on what would be and would not be acceptable. We could accept these requirements but interpretations need to be thought through. Circumstances change throughout the year and although a building may not be suitable in the Winter it may meet the criteria in the Summer as other stock will be out in the fields with just for example the show animals housed or the rams which will be going to sale.**

- An outdoor QU facility should provide effective separation between quarantined and other animals with stock proof double-fencing at least 3 metres apart, with its own dedicated access, effluent management and feeding arrangements. There should be no direct contact with other animals on the farm. **NSA response We accept these requirements although would question why for example the gap for MVA is only 2m. If a farmer is already meeting the MVA rules then this should be sufficient. In addition this needs more interpretation e.g. Will single stock fencing of fields with no stock in the neighbouring field during quarantining comply or an arable field next door with the next stock field for instance 100 metres away and properly fenced? It has been suggested that farmers should have the ability to move their quarantine facilities around the farm depending on crop rotations and general farm management. This would require more of a 'quarantine plan' rather than an actual facility which, if implemented properly, could provide the ultimate in disease control. We would like the Welsh Govt to consider this approach.**

QU Operational Rules (bullet points as per consultation document, NSA responses in bold text):

- No direct contact between animals in a QU and resident or other stock at any point. **NSA response Agreed**
- People entering a QU must either wear dedicated clothing, gloves and footwear or use items that can be disinfected, ensuring that they are cleansed and disinfected when entering and leaving a QU. **NSA response this is a clear biosecurity measure related to highly transmissible diseases such as F&M. We would rather see more simple measures that were less draconian and encourage people to quarantine for endemic diseases. We assume that if there was a F&M outbreak all movements would be highly controlled anyway. Needs to be practical – it could be a requirement that a separate set of disposable overalls is used when feeding or checking stock in a QU, or that washables could be used and cleaned prior to entry into and exit from a QU. We should be employing measures that would be proportionate to prevent the spread of diseases such as Maedi Visna or internal parasites – in the case of a highly contagious exotic we would support movements being shut down.**
- If dedicated gloves are not used hand washing facilities must be available for people entering and leaving a QU. **NSA response – as above, we feel this is**

something that should be encouraged but not required – for the reasons above

- No feed equipment or machinery to be shared between the farm and it's QU, except where feed can be 'dropped' into the QU by equipment, which has been thoroughly cleansed and disinfected before its use. **NSA response. Equipment can be shared surely but should be cleaned prior to sharing. This requirement should simply prevent contamination. It is unrealistic to expect a dedicated tractor but to ask for the wheels/contact areas to be sprayed with disinfectant while between resident and quarantine stock would seem to be reasonable.**
- For essential welfare and exceptional husbandry reasons, vehicles can enter a QU e.g. to move animals off. Vehicles must be thoroughly cleansed and disinfected when entering and leaving a QU. **NSA response This should be for routine husbandry needs not exceptional – please see above.**
- Incoming animals must be transported directly into a QU and the transporting vehicle must be thoroughly cleansed and disinfected when entering and leaving the QU. **NSA response We agree.**
- A QU can be used for other purposes when no animals are in quarantine. This must be clearly indicated and with appropriate biosecurity procedures in place. **NSA response We agree**
- Appropriate signage must be displayed when the QU is in use so all farm staff are aware that they must follow the required biosecurity procedures. **NSA response We agree**
- Lactating animals cannot be moved between a QU and the farm's milking parlour, but can be milked in the QU with a mobile milking facility provided it is thoroughly cleansed and disinfected before and after its use. **NSA response Only relevant for milking sheep but we would accept this.**
- Animals must remain in the QU facility for 6 days (i.e. arrival of animals into QU is day 0 and then remain for the subsequent 6 whole days. If animals are part way through the 6 day quarantine period when other animals are introduced then this resets the clock and all animals must remain in the QU for 6 days from that point). **NSA response We accept and agree**
- Show animals may leave a QU in under 6 days if they are attending a further licensed show, provided they undergo 6 days quarantine before attending the first show and after returning from the last. **NSA response we accept this requirement? Please see other comments above about the operational rules and cost of operating a QU.**
- Animals may leave a QU for veterinary treatment, but on return, they (and any new born offspring) must stay in the QU for the remainder of their 6 day standstill period. **NSA response - The current rules as stated in the current 2003 disease order should remain in force. During lambing the QU may not be in**

operation and will put a farmer under an unnecessary 6DSS. This exemption has worked since 2001 and should remain unchanged so not to discourage farmers from using the vet.

- Records of animals' ID and dates of entry and departure from the QU must be maintained on the farm. **NSA response We agree**
- QUs will be allocated a separate CPH number. **NSA response we would prefer this not to be the case due to the move to rationalise and reduce holding numbers. Given the need for UKAS certification and the need for reporting movements we feel strongly that this function could be undertaken by a tick box on the EID Cymru electronic register. The new EID Cymru AML1 forms have already catered for a tick box for the current isolation/separation which should be maintained, and keeps this the same as the current ARAMS system which maintains continuity especially for cross border movements.**
- In order for the standstill exemption to apply, movements into and out of a QU must be reported electronically within 24 hours. **NSA response we accept this requirement in theory but it is not practical please see comments above.**
- A QU must be approved by a UKAS accredited Certification Body and re-approved every 18 months, paid for by the livestock owner/keeper. **NSA response We accept this requirement**
- Unannounced inspections will be used to verify compliance when the QU is in-use. **NSA response we accept this requirement but would like clarification over the percentage of spot inspections likely to be employed.**

3. *Nature and number of QUs per farm premises - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.*

Nature and number of QUs per farm premises

The original working assumption was that there should be only one approved QU per farm premises, which are either indoor or outdoor or both. In developing the proposal this assumption was challenged and it was suggested that multiple QUs may be required for each farm premises.

Therefore, the following four options were developed:

Option A *Only one approved QU per farm on only one site (which could comprise both indoor and outdoor facilities)*

Option B *Only one QU per farm, comprising either one or two separate sites operating as one unit i.e. any animals entering either site would restart the 6DSS on both sites*

Option C *Two QUs per farm with separate CPH numbers, but only one can be in use at one time*

Option D *Two QUs per farm with separate CPH numbers and both can be in use at the same time.*

NSA response. Once you accept that quarantine units can effectively improve disease management then it is difficult to make a case to restrict their use. Our

view is that we should expect compliance with the requirements and allow farmers to use option D above. We would like to see the use of a tick box as opposed to having separate CPH numbers for each unit.

4. Changes to the Disease Control (Wales) Order 2003 - your views are being sought as to whether you agree or otherwise with the proposed changes.

NSA response Item 12 on the disease control order (Wales) Change proposed NB Buyers of breeding rams that don't want to comply with the standstill will have the option of QUs if it's important to them

Item 13 similarly to above except that the requirements on these farmers will be higher – we've pointed that out under point 1

Schedule 2

Item 5 Return of sheep from a show or exhibition as above item 13 this change will allow the same as currently but will make the requirements more difficult to meet.

Item 6 Return of rams from market As above

Item 7 Arrival of rams for breeding As above

Item 11 Return of sheep from AI facilities As above

Item 15 Return from veterinary treatment Movement for veterinary treatment, etc. Should remain as the existing 2003 order below and not be changed.

1.—(1) The movement of an animal to a place for veterinary treatment.

(2) The movement of an animal from a place for veterinary treatment provided the animal has not come into contact with other animals while at the place of treatment.

(3) The movement of an animal to a laboratory for diagnostic tests to be carried out to ascertain whether the animal is affected by or has been exposed to a disease.

Phil Stocker & Helen Davies

1/2/16

Confidentiality

Responses to consultations are likely to be made public, on the internet or in a report.

If you would prefer your response to remain anonymous, please tick here:

☐**Response Form**

Consultation on the proposed introduction of Quarantine Units		
Name	PAT MERCER	
Organisation (if applicable)	THE PYGMY GOAT CLUB	
Address (include postcode)	MAES-Y-CERRIG, CAPEL IWAN, NEWCASTLE EMALYN, CARMU. SA38 9LR	
Email Address	Peter@maesgwyn7.freemove.co.uk.	
Telephone	01239 711238	
Type (please select by placing a tick next to the appropriate type opposite)	Member of the farming community	
	Public Body (Local Authority, Police, Fire and Rescue Services etc.)	
	Professional Body / Interest Group	✓
	Third Sector (Community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	
	Other (not listed above) please specify below:	✓
	Goat Keeper, R. Regional Advisor Wales for Pygmy Goat Club	

Question 1

To what extent do you agree with the benefit of implementing Quarantine Units to replace the current 6-Day Standstill Rule exemptions?

(Please tick)

Strongly Agree		Agree		Disagree		Strongly Disagree	✓
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Please provide an explanation for your response below:

The proposal takes no account of the smallholder or individual who keeps, breeds and shows livestock kept primarily as pets or as a hobby. Such individuals do not have the indoor space, separate access etc. needed for a proposed Q.U.

The old system of isolation units provided much greater flexibility and accommodated the smallholder/hobbyist much more effectively.

For many smallholders/hobbyists there will be ~~no~~ no choice in this new system, the only option will now be the 6 day standstill.

Question 2

The Proposed Changes - What are your thoughts relating to the proposed QU process?

With reference to the process flows and supporting notes provided on pages 11 to 21 we are interested to hear your views on the proposed process and any areas that you feel have been omitted or are unclear.

Applying for a Quarantine Unit

Clear

Validation and Allocation of QU CPH Numbers

Clear

Maintaining a QU – 18 Month Re-Approval

Clear

QU In Use Inspections

Clear

Question 3

Nature and number of QUs per farm premises - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.

a) Which one of the four options illustrated in pages 22 to 24 do you feel should be considered further (please tick):

(Please tick)

Option 1	<input type="checkbox"/>	Option 2	<input type="checkbox"/>	Option 3	<input type="checkbox"/>	Option 4	<input type="checkbox"/>
----------	--------------------------	----------	--------------------------	----------	--------------------------	----------	--------------------------

Please provide an explanation for your response below:

No comment

b) Are there any other pros or cons that should be included and therefore considered?

Complete the table below to provide us with your suggested changes or additional pros or cons for us to consider. Please feel free to either insert more rows (for electronic responses) or continue on a separate sheet (for hard copy responses) if more space is required.

Option	New (N) or Amend (A)	Please describe your suggested change and include your reasoning.



Quality Welsh Food Certification Ltd.
ardystio bwyd Cymreig safonol

Quality Welsh Food Certification Ltd.'s response to the Welsh Government's consultation on the introduction of quarantine units as an alternative to the six day standstill requirement. (Consultation Number WG27374, dated 7th December 2015)

Thank you for the opportunity to reply to the consultation on the introduction of quarantine units (QUs) as an alternative to the current system of six day standstill (6DSS) following the movement of animals onto a farm.

1 To what extent do you agree with the benefit of implementing Quarantine Units to replace the current 6-Day Standstill Rule exemptions?

Quality Welsh Food Certification Ltd (QWFC) is an UKAS accredited certification body that certifies farms against the standards of Welsh Lamb & Beef Producers Ltd (WLBP)'s Farm Assured Welsh Livestock Scheme (FAWL), their Welsh Organic Scheme and Assured Food Standards' dairy scheme. QWFC inspects over 5,000 Welsh farms annually. We **strongly agree** with allowing farmers the opportunity to establish quarantine units (QUs), not just as an alternative to the six day standstill (6DSS) but as a positive step in raising biosecurity standards generally. The proposal fits in well with a proactive approach to health planning that is imbedded in the three schemes that we certify and dovetails well with the constructive approach to proactive animal health and welfare undertaken by the Welsh Government as proposed by its Wales Animal Health and Welfare Framework. It also fits in well with the strategic vision that WLBP has for a proactive approach to animal health and welfare.

The first Implementation Plan published by the Framework for 2015/16 sets out a welcome commitment to put high standards of biosecurity at the core of everything that the Wales Animal Health & Welfare Framework Group and Welsh Government was going to do, noting that good biosecurity is not just important in maintaining farm profitability but was the first line of defence against serious notifiable disease. It is, of course, the first line of defence for a range of other diseases that are more likely to affect farming on a daily basis. The Implementation Plan also noted that the introduction of QUs would replace "complexity with simplicity." QWFC is concerned though that parts of the proposals outlined in the consultation document will mean that such simplicity will not be achieved.

QWFC has reservations that some of the proposals in the final consultation document are overly bureaucratic and risk averse. Consequently, many farmers will be inhibited from taking up the option of setting up QUs and that will be very unfortunate and a missed opportunity to move the industry forward in the direction that the Welsh Government's own policy wishes to take it. We understand that Welsh Government have concerns about the threat of exotic diseases, in particular, foot and

mouth, but we consider that some of the proposals for the management of QUs laid out in the consultation document are too cautious and restrictive and inhibit progress towards the management of other diseases should more farmers take up improved biosecurity as part of a holistic animal health planning process. By providing an incentive to farmers of replacing the 6DSS with the option of practical QUs, Welsh Government could provide a significant impetus to achieving its own declared aims of higher health and welfare standards. If that is to be the case, it is essential that QUs are established with rules and regulations that are proportionate to the level of risk that is faced.

We understand that our concerns about the complexity of the proposed QU operational rules are widely shared by the farming industry. We would appreciate it if the Welsh Government could take account of those concerns.

2 The proposed changes – What are your thoughts relating to the proposed QU process?

We **AGREE** with many of the processes outlined for the proposed changes but have reservation about parts that we **DISAGREE** with. We set out our views below.

Applying for a Quarantine Unit

QWFC accept the consultation's proposals for applying for a QU but believe that further discussions with the United Kingdom Accreditation Service (UKAS) may be necessary to ensure that the processes outlined in the consultation document adhere to ISO17065. We would for example wish to understand the implication of the proposals for the commitment to confidentiality that certification bodies normally have to give to clients before they inspect or certify them

Validation and allocation of QU CPH numbers

QWFC accept the consultation's proposals for the validation and allocation process but again believe that discussions will need to take place between the Welsh Government, UKAS and CBs before the full process can be accepted as complying with ISO17065. For example (and another one relating to confidentiality) it's suggested that CBs will be expected to forward copies of completed application forms and inspection checklists to Welsh Government before a CPH number can be allocated for the QU. We believe that forwarding the checklist may conflict with the CB's commitment under ISO17065 to keep such information confidential. We'd also like further clarification on whether CBs should be responsible for addressing errors made by livestock owners/keepers in their CPH application or whether they should be addressed directly to the livestock owner/keeper by Welsh Government. (Step 4, page 14).

Maintaining a QU – 18 month re-approval

In the other schemes that QWFC certifies, QWFC would notify a client that a further inspection was due. We believe that it would be better for the QU scheme that CBs should notify QU certificate holders that they will be due for re-inspection by a specified date and make arrangements to undertake the inspection. If they don't wish to maintain their QU certification, they can inform the CB at that point. This is a slight variation to the process set out on page 17 of the consultation: we accept the processes outlined in the supporting notes.

QU in use inspections

Again QWFC believes that further discussions may be necessary with UKAS in respect of the proposal for in-use QU inspections, especially give the hybrid model proposed.

We find it difficult to understand why APHA will be required to inspect the QUs when in-use. APHA will not be within the scope of a certification body's control processes. If APHA find a case of non-compliance, they cannot withdraw certification but report it to the certification body. The certification body in turn, will have to treat it as a complaint and investigate it thus doubling the work. It would be far simpler, efficient and cost effective for the in-use inspection to be undertaken by the certification body that has certified the QU in the first place who could deal with any problem immediately. All records will be to hand as will inspection reports which would not be available to APHA. It would also save Welsh Government money and not add much to the cost for certification bodies.

QWFC also considers that the requirement to report movements electronically with individual identities of animals is an unnecessary burden that will discourage participation to the detriment of the stated objective of raising biosecurity standard. A simple email or text message to the CB indicating that a QU was in-use and that 'x' number of animals were to be or had been moved on a given day would be more than sufficient to trigger in-use inspection and would enable inspectors to visit a QU more quickly, especially at week-ends. This would clearly be workable, efficient, simple and indeed preferable to most farmers and keep the entire process within the control of UKAS accreditation.

We accept the other explanations provided for the in-use inspection of QU.

3a Which of the four options illustrated in pages 22 to 24 do you feel should be considered further?

We understand that WLBP would favour option 2 as it combines comparative simplicity with the ability to operate an effective QU. We note also that some see the advantages offered by Option 4. It does allow for greater flexibility for those farmers that might wish to employ two separate units but would make inspection more complex.

3b Are there any other pros & cons that should be included and therefore considered?

Option	New (N) or Amend (A)	Suggested change and reasoning
1	N	Guidance Notes need to be provided that will give a better interpretation of the use of the QU. This is particularly true for QU requirements and operational rules.
2	A	Indoor facilities should not necessarily consist of a separate building if it can be shown that animals are kept completely apart and do not share air space
3	A	Double fencing with a separation of 3m would be acceptable in an open field but if there are barriers in place (such as hedges or walls) that

		prevent nose to nose contact with neighbouring stock then that should be accepted as sufficient for separation.
4	A	The individual identification of animals entering a QU is excessive and overly burdensome. It will inhibit participation.
5	A	Farmers entering a QU to observe their stock should not necessarily have to adhere to the full cleansing and disinfecting requirements proposed. Clearly if stock is being handled then farmers must adhere to those processes. Measures need to be proportionate to the level of risk.
6	A	It should not be necessary for vehicles transporting animals into a QU to be cleansed and disinfected on the way in to a QU.
7	A	QU Operational rules in general should be proportionate to the risk of disease spread. They need not be as rigorous as outlined in the consultation if we are to encourage participation.
8	N	In-use inspection should be undertaken by accredited certification bodies as part of UKAS accreditation to make the process of in-use inspection more efficient, more cost effective and less burdensome
9	N	Farmers should be able to notify that the QU was in-use electronically without reporting the individual identity of animals moved

4 Changes to the Disease Control (Wales) Order 2003 – your views are being sought as to whether you agree or otherwise with the proposed changes.

We **AGREE** with the changes that are required to amend the DCO to enable QU to be introduced, save for the changes that WLBP would like to see made to the QU proposals

Garthgwynion Estate Limited
Garthgwynion, Machynlleth, SY20 8TX, Powys, Wales

Miss J. Mainwaring,
Rural Payments Wales
PO Box 1081,
Cardiff CF11 1SU

18 JAN 2016

18 January 2016
A0004485

Dear Miss Mainwaring,

Six Day Rule Consultation

We are responding to the Deputy Minister's invitation in Gwlad on 7 December to express our views on proposals to provide quarantine units as an exemption to the current standstill arrangements for cattle, sheep and goats.

There are two aspects – (A) Is the Six Day Rule still justified? (B) Would quarantine units help?

A. Is the Six Day Rule governing the movement of livestock still justified, or put it another way, given the cumulative extent of additional farming regulation introduced since the turn of the century what justification is there for retention of the rule? Additional regulation has taken the form of:

- (a) Movement licences
- (b) British Cattle Movement Service (excellent)
- (c) EID tags for sheep (a separate issue causing untold problems)
- (d) Cross-compliance inspections
- (e) Farm Assurance inspections
- (f) Cleaning and disinfection of vehicles at livestock markets
- (g) Medicine Records etc.

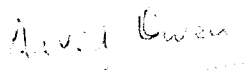
Welsh Government has claimed its retention of the rule has prevented the spread of disease but, given the changes outlined above, is it *still* really justified, and at what cost? It causes immense problems for farmers in terms of time spent on paperwork and expense, and especially at times of the year when they are selling frequently. For example a hill farmer with a single holding number selling fat lambs at market each week over the autumn period is effectively prevented from buying in stock at all. There is besides authoritative veterinary opinion that the rule is insufficient to catch diseases such as foot and mouth where the incubation period may be up to 12 days. And were there to be an outbreak of some infectious disease the rule could rapidly be restored.

B. Would quarantine units help? At first sight the concession appears welcome, but on further examination it is just another piece of regulation, calling for even more documentation and inviting snooping by members of the public or government inspectors.

Conclusion. For the reasons given above we believe that (a) quarantine units are not the answer to the problem and (b) the six day rule has served its purpose, outlived its usefulness, is bureaucratic and burdensome. It cannot justify its retention and should be scrapped.

Please could a hard copy of any acknowledgement be sent to Garthgwynion and a further copy by email to the writer at dhoowen33@gmail.com

Yours sincerely,



David Owen

Confidentiality

Responses to consultations are likely to be made public, on the internet or in a report.

If you would prefer your response to remain anonymous, please tick here:

☐
Response Form

Consultation on the proposed introduction of Quarantine Units		
Name	D R A Matheson	
Organisation	Tenant Farmers Association Cymru	
Address	5 Brewery Court Theale Reading Berkshire Post Code - RG7 5AJ	
E-Mail Address		
Telephone	01189306130	
Type (please select by placing a tick next to the appropriate type opposite)	Individuals	
	Public Body (Local Authority, Police, Fire and Rescue Services etc.)	
	Professional Body / Interest Group	<input checked="" type="checkbox"/>
	Third Sector (Community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	
	Other (not listed above) please specify below:	

Question 1

To what extent do you agree with the benefit of implementing Quarantine Units to replace the current 6-Day Standstill Rule exemptions?

(Please tick)

Strongly Agree	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Strongly Disagree	<input type="checkbox"/>
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Please provide an explanation for your response below:

From a purely Tenant Farmers perspective it is unlikely that the creation of Quaranteen Units would be of any benefit, and could even be a disadvantage, for the following reasons.

It is highly unlikely that a Landlord would agree to the stringent biosecurity rules for an outside unit. viz if for instance the shooting rights were let to a third party, would the shooting tenant be barred from entering that piece of land without adhering to the complex cleansing rules ?

For an indoor unit, permission might be obtained to alter an existing building, or construct a new one, however as this would probably be classed as a "tenants fixture", all alterations would have to be removed at end of tenancy. This would make the likely cost prohibitive.

Thus the present arrangements/exemtions are likely to be more beneficial for a tenant than the new proposals. This needs to be bourn in mind as the Quaranteen Unit project progresses.

Question 2

The Proposed Changes - What are your thoughts relating to the proposed QU process?

With reference to the process flows and supporting notes provided on pages 11 to 21 we are interested to hear your views on the proposed process and any areas that you feel have been omitted or are unclear.

Applying for a Quarantine Unit

It is suggested that the cost of applying for a Q U (the fee) should be a flat rate for all.

However if inspection and approval is to be undertaken by Farm Assurance certification bodies (F A W L/ F A B B L) and the applicant is already a member of such a scheme, then a discount would probably be available if inspection was undertaken at the same time as say F A W L inspection. Thus under a flat rate system, Farm Assured farmers would in effect be subsidising non Farm Assured Farmers application. Would this be fair?

See additional notes on separate sheet.

Validation and Allocation of QU CPH Numbers

In the past, finalising the C P H project has been sighted as a reason for delaying implementation of Q U project. It is to be hoped that there is no delay in issuing new C P H numbers for Q U's due to the projected time scale of completion of C P H project to 2018.

Maintaining a QU – 18 Month Re-Approval

See general comments
on seperate sheet

QU In Use Inspections

See general comments
on seperate sheet

Question 3

Nature and number of QUs per farm premise - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.

a) Which one of the four options illustrated in pages 22 to 24 do you feel should be considered further:

(Please tick)

Option 1		Option 2	<input checked="" type="checkbox"/>	Option 3		Option 4	
----------	--	----------	-------------------------------------	----------	--	----------	--

Please provide an explanation for your response below:

For those able to create Q U this would appear to be the best option. Whether one Q U or a number per farm depends on the outcome of C P H consultation.

If the option of retaining multiple C P H numbers within the ten mile radius of main holding is retained, then it might be advantageous for a farmer to be allowed more than one Q U. However if all the farmers separate holdings are amalgamated under one number, then one Q U (comprising both indoor and outdoor) would be satisfactory.

If multiple holding numbers are allowed then there probably would be no need for more than one Q U per farm.

There may even be no incentive to create any Q U, as one of the farmers other holdings could be used to accept stock on and only moved to main holding when no off movements are planned from main holding.

Thus on balance the option of one Q U per farm (both indoor and outdoor) is probably all that is necessary.

b) Are there any other pros or cons that should be included and therefore considered?

Complete the table below to provide us with your suggested changes or additional pros or cons for us to consider. Please feel free to either insert more rows (for electronic responses) or continue on a separate sheet (for hard copy responses) if more space is required.

Option	New (N) or Amend (A)	Please describe your suggested change and include your reasoning.
		No further comments.

Question 4

Changes to the Disease Control (Wales) Order 2003 - your views are being sought as to whether you agree or otherwise with the proposed changes.

a) To what extent do you agree with the proposed changes set out in pages 25 - 33?

(Please tick)

Strongly Agree		Agree		Disagree	<input checked="" type="checkbox"/>	Strongly Disagree	
----------------	--	-------	--	----------	-------------------------------------	-------------------	--

b) If you disagree or wish to provide any further comments please complete the table below.

Please feel free to either insert more rows (for electronic responses) or continue on a separate sheet (for hard copy responses) if more space is required.

Ref No.	Your views
	See separate sheets.

Continuation

Question 2 page 42 and 43

In the past farmers local Vet has been able to certify an Isolation Unit, as well as acting as Farm Assured inspector .

It might be worth revisiting this as an alternative proposal to all certifications and inspections being vested in the Farm Assured Certification bodies. Would this be a cheaper alternative ?

A farmers own Vet might be in a better position to assess that particular farms biosecurity needs / risks.

Question 4 page 45

Because of possible adverse affects the creation of Q U's on Tenant Farmers, as outlined in answer to question 1 we disagree with some of these proposals.

If a T F was unable to create a Q U because of landlords refusal to grant permission, he would automatically be obliged to abide by six day standstill rules on whole holding, and under the proposals would no longer have the options of creating, Isolation Units, ILAMS, SOA's or Linked Holdings.

The only alternative would be to have another seperate holding with seperate C P H number in or outside ten mile radius. This would of course mean that stock movements between the two holdings would trigger six day standstill on the recipient holding, but would be better than nothing

It is therefore essential that the option of retaining multiple holding numbers is retained,

24 hour reporting of movements to Q U's

For those able to create Q U's the insistance that this should be

Continuation (Q 4 page 45)

carried out electronically within 24 hours will disadvantage the 30% of rural population (farmers) who as yet do not have broadband access, and the probable 75% of these who do not have On-Line connection at all. (or even a computer)

The only reason given for 24 hour reporting is to allow inspections to take place within the six day time frame.

Therefore if there were other methods of 24 hour reporting, these should be considered.

Reporting of cattle movements to B C M S is allowed by telephone, and works well. It is not clear whether cattle movements onto and out of a Q U by this method is to be allowed. It would be bizarre if it were not.

Assuming telephone reporting of cattle movements is to be allowed it would surely make sense to allow sheep movements to be similarly reported.

Clearly the numbers involved would be far greater, but provided that the fact that the Q U was in use was properly reported within 24 hours, this should allow an inspection to take place.

A paper movement document containing the individual animal numbers could be sent at the same time.

It is clear that the W A G intend at some time, to phase out paper movement reporting. It would appear prudent to have a back up system in place in the event of computer breakdown. Allowing sheep movement reporting now by telephone, for the purpose of Q U inspections would stand the W A G in good stead for any future such plans,

The above proposal was the subject of a letter written to Conlan Spencer, head of L I D A G team on the 15 June 2015. This letter was never acknowledged. A copy is enclosed.

Adriana Vaux

From: Adriana Vaux <advice2@tfa.org.uk>
Sent: 15 June 2015 14:17
To: 'Conlon, Spencer (NR - ARAD)'
Subject: Quarantine Units

Dear Spencer,

I am emailing on behalf of Dennis Matheson who would like to make a couple of comments in relation to the draft consultation document for various alternatives for implementing the creation of quarantine units before the next LIDAG meeting on 24th June.

- 1) The reason electronic reporting is required is solely in order to allow time for inspections, thus if the movement was reported by telephone by the recipient, together with the usual paper ear number version this ought to achieve the same objective. At present anyone without a computer can report cattle movements, including ear numbers to BCMS by telephone, a system which works very well. Obviously if a large number of sheep ear numbers had to be read out, this would be more difficult, hence Dennis' suggestion that the fact that the quarantine unit was in use reported by telephone within the statutory 24 hours, with ear numbers to follow later by paper, should enable inspections to proceed. This would remove one hurdle from non-computer users who wished to create such a unit.
- 2) Farmers who are unable to create quarantine units for the above reasons must not be disadvantaged. The present exemptions from movement restrictions for animals going to the vet should remain. The removal of this exemption was originally proposed, later dropped. This should not be revisited.

Dennis is unable to make the next LIDAG meeting and therefore sends his apologies.

Kind Regards,

Adriana

Adriana Vaux BSc (Hons) MSc | Assistant Adviser

Tenant Farmers Association | 5 Brewery Court | Theale | Reading | RG7 5AJ

t: 0118 930 6130 | f: 0118 930 3424

e: advice2@tfa.org.uk | w: www.tfa.org.uk

Company No: 1587270



CONSULTATION ON THE INTRODUCTION OF QUARANTINE UNITS

Name: Mrs Jennifer Layton Mills

Organisation: WELSH LIVESTOCK AUCTIONEERS ASSOCIATION

Address: McCartneys LLP, Wylcwm House, Knighton, Powys LD7 1AE

Email address: jml@mccartneys.co.uk

Telephone: 01547 528621

Type: Professional Body/Interest Group

1. To what extent do you agree with the benefit of implementing Quarantine Units to replace the current 6-Day Standstill Rule exemptions?

Strongly agree. The Welsh LAA fully agree with the principal of offering the use of quarantine units as an alternative to the current 6 day standstill requirements. The 6 day standstill has limited our customers trading and business decision making throughout the agricultural year but especially at the important trading periods in the spring and autumn. The present system has not helped farmers cash flow especially when required at autumn breeding sales. We do not see the proposals as simply a replacement to the 6 day standstill exemption but as an alternative to the requirements for those who choose to adopt them. The current 6 day standstill controls were obviously heavily influenced by the foot and mouth disease. We therefore strongly agree with allowing farmers the opportunity to establish quarantine units not just as an alternative to the 6 day standstill but as a positive step in raising bio security standards in general.

In our view the Welsh Government have taken far too long in introducing the process and we would like to see this actioned as soon as possible.

The introduction of quarantine units will be better at minimising the threat of spreading disease rather than the current regulations where animals can touch their neighbours' animals through boundaries under the current 6 day rule.

We feel that the cost should be borne by the Welsh Government as it should consider farming important to Wales as a whole and see that it remains profitable, sustainable and efficient.

2. The proposed changes – What are your thoughts relating to the proposal QU process?

We would challenge why the inspection and approval process looks so draconian. After all the present 6 day standstill rules are not effective and by offering a realistic alternative it will surely help with overall compliance. If the rules and conditions are too unrealistic (possibly as a way to prevent large scale take up) it will neither help government or industry.

The LAA feel that the 21 day turnaround would seem too long at certain times of the year. It obviously wholly depends on when the scheme is launched. Whoever the scheme owners are which we presume is the Welsh Government, should stipulate that there can be a turn around of fewer than 21 days. We believe that the certification body should notify the quarantine units certificate holders that they are due for a re-inspection by a specified date and make arrangements to undertake the inspection. If the farmers do not wish to maintain their QU certification then they can remove it at this point. The LAA consider that the requirement to report movements electronically with individual identities of individual animals is an unnecessary burden that will discourage

participation. The need to electronically report all movements within 24 hours is considered too short of a period, particularly for a sheep farmer who does not have access to their own computer or even internet access. Surely just the total number of animals could just been telephoned through. WAG only need to look at the number of farmers that have electronically reported sheep movements via EID Cymru to see how few have internet access. Most already use an agent to submit their SAF forms.

3a Nature and number of QUs per farm premises

The LAA's opinion is that once the Welsh Government accept the quarantine units can effectively improve disease management then it is difficult to make a case to restrict their use. The LAA's view is that we should expect compliance for the requirements and allow farmers to use Option D.

4 Changes to the Disease Control (Wales) Order 2003

We strongly agree with the changes that are required to amend the DCA to enable quarantine units to be introduced as soon as possible. The LAA emphasise the establishment of Quarantine Units must be cost effective and practical to implement.



WELSH LAMB & BEEF PRODUCERS LTD

CYNHYRCHWYR CIG OEN
AC EIDION CYMREIG CYF



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PO Box 8, Gorseland, Ffordd y Gogledd, Aberystwyth, Ceredigion SY23 2WB Ffôn: 01970 636688 Ffacs: 01970 624049 e-bost: info@wlbp.co.uk

Welsh Lamb & Beef Producers Ltd.'s response to the Welsh Government's consultation on the introduction of quarantine units as an alternative to the six day standstill requirement. (Consultation Number WG27374, dated 7th December 2015)

Thank you for the opportunity to reply to the consultation on the introduction of quarantine units (QUs) as an alternative to the current system of six day standstill (6DSS) following the movement of animals onto a farm.

1 To what extent do you agree with the benefit of implementing Quarantine Units to replace the current 6-Day Standstill Rule exemptions?

WLBP owns the Farm Assured Welsh Livestock scheme, FAWL. The FAWL scheme has encouraged farmers to raise standards of animal health and welfare for many years and monitors progress through a process of regular farm inspections every 18 months. WLBP has consistently promoted the benefits of good biosecurity procedures as part of a robust animal health planning process, preferably working in conjunction with a farm's veterinary surgeon. We therefore **strongly agree** with allowing farmers the opportunity to establish quarantine units (QUs), not just as an alternative to the six day standstill (6DSS) but as a positive step in raising biosecurity standards generally.

We note the constructive approach to proactive animal health and welfare undertaken by the Welsh Government as noted in its Wales Animal Health and Welfare Framework, initially published in 2014. WLBP has long championed many of the principles and the vision set out in that document.

The first Implementation Plan published by the Framework for 2015/16 sets out a welcome commitment to put high standards of biosecurity at the core of everything that the Wales Animal Health & Welfare Framework Group and Welsh Government was going to do, noting that good biosecurity is not just important in maintaining farm profitability but was the first line of defence against serious notifiable disease. It is, of course, the first line of defence for a range of other diseases that are more likely to affect farming on a daily basis. The Implementation Plan also noted that the introduction of QUs would replace "complexity with simplicity."

WLBP had the opportunity to contribute to the process of bringing forward the proposals for the introduction of QUs as an alternative to the 6DSS through the Task and Finish Group that evaluated alternatives to the 6DSS following the Working Smarter Review. The QUs consultation document fairly sets out how the proposal was developed by the Task & Finish Group and notes that there were differences between proposals favoured by Welsh Government officials on the one hand and farming industry representatives on the other. It's clear from the group's letter to the then Minister for Natural Resources & Food, Alun Davies that the Task & Finish Group had to agree to disagree on certain details. WLBP still has reservations that some of the proposals in the final consultation document are overly bureaucratic and risk averse. Unfortunately, the proposals don't replace

complexity with simplicity. Consequently, many farmers will be inhibited from taking up the option of setting up QUs. That is very unfortunate. It is a missed opportunity to move the industry forward in the direction that the Welsh Government's own policy wishes to take it. We understand that Welsh Government have concerns about the threat of exotic diseases, in particular, foot and mouth, but we consider that some of the proposals for the management of QUs laid out in the consultation document are too cautious and restrictive and inhibit progress towards the management of other diseases should more farmers take up improved biosecurity as part of a holistic animal health planning process. The challenge for industry is to change mind-sets, to persuade farmers of the benefits of proactive animal health and welfare planning. By providing an incentive to farmers by replacing the 6DSS with the option of practical QUs, Welsh Government will provide a significant impetus to achieving its own declared aims of higher health and welfare standards. It is essential though that QUs are established with rules and regulations that are proportionate to the level of risk that is faced. We need to bear in mind that Northern Ireland has dispensed with the 6DSS already - and with no provision for QUs.

The current 6DSS is a blunt tool to manage the spread of disease. It is perfectly possible, for example, for one farmer to bring stock home one day, release them in a field that allows nose to nose contact with animals on a neighbour's farm, animals that are in turn are moved on to another market for sale the following day. Farmers have been encouraged to have multiple holdings to get around the spirit if not the letter of the regulations. The introduction of QUs will be better at minimising the threat of spreading disease than is the case with current regulations.

WLBP would appreciate it if the Welsh Government could take account of the farming industry's continuing concerns about the QU proposals so as to achieve the goals not just of Welsh Government but those of the whole industry, a more profitable, sustainable and efficient farming sector with high standards of animal health and welfare at their core.

2 The proposed changes – What are your thoughts relating to the proposed QU process?

We **AGREE** with many of the processes outlined for the proposed changes but have reservation about parts that we **DISAGREE** with. We set out our views below.

Applying for a Quarantine Unit

WLBP accept the consultation's proposals for applying for a QU but would point out that the scheme 'owners' (i.e. Welsh Government in this case) can set its own limit for applications to be processed: it doesn't have to be 21 days, it can be fewer or more. UKAS will also consider that the application process will have started from the day the application is received by the certification body (CB). (Ref step 6b, page 12 of the consultation document)

Validation and allocation of QU CPH numbers

WLBP would have preferred it if farms could have been allocated just one CPH number that would have served for both the main holding and QU. It's a matter of regret that government's data processing systems can't accommodate that. We accept the consultation's proposals for the validation and allocation process but believe that discussions will need to take place between the Welsh Government, UKAS and CBs before the full process can be accepted as complying with ISO17065. We note for example, that CBs will be expected to forward copies of completed

application forms and inspection checklists to Welsh Government before a CPH number can be allocated for the QU. We believe that forwarding the checklist may conflict with the CB's commitment under ISO17065 to keep such information confidential. We'd also like further clarification on whether CBs should be responsible for addressing errors made by livestock owners/keepers in their CPH application or whether they should be addressed directly to the livestock owner/keeper by Welsh Government. (Step 4, page 14).

Maintaining a QU – 18 month re-approval

We believe that CBs should notify QU certificate holders that they will be due for re-inspection by a specified date and make arrangements to undertake the inspection. If they don't wish to maintain their QU certification, they can do so at that point. This is a slight variation to the process set out on page 17 of the consultation: we accept the processes outlined in the supporting notes.

QU in use inspections

WLBP believes that further discussions may be necessary with UKAS in respect of the proposal that APHA undertake in-use QU inspections. In order to validate the effectiveness of the process, UKAS may also expect certification bodies to undertake in-use inspections as well. The use of a hybrid system of certification has its weaknesses. APHA can only report their findings to certification bodies that will have to treat a critical report as a complaint against a licensee and investigate the matter before it can withdraw certification. It will also need to allow such licensees to submit an appeal against any decision to withdraw certification. Our understanding is that APHA has no role in the certification process other than to act on behalf of Welsh Government during when the QU is in-use. If the unit is operating correctly, APHA need to report to the CB and not the livestock owner/keeper. However, we believe that this is an issue that needs to be resolved in discussions with UKAS.

WLBP consider that the requirement to report movements electronically with individual identities of individual animals is an unnecessary burden that will discourage participation to the detriment of the stated objective of raising biosecurity standard. A simple text message to either the CB or APHA indicating that a QU was in-use and that 'x' number of animals were to be or had been moved on a given day should suffice. Having discussed the matter with QWFC, the UKAS accredited body responsible for certifying the FAWL scheme, this would clearly be workable and indeed preferable as it would enable inspectors to visit a farm more quickly.

We accept the other explanations provided for the in-use inspection of QU.

3a Which of the four options illustrated in pages 22 to 24 do you feel should be considered further?

WLBP would favour option 2 as it combines comparative simplicity with the ability to operate an effective QU. However, we also see the advantages offered by Option 4. It does allow for greater flexibility for those farmers that might wish to employ two separate units but would make inspection more complex.

3b Are there any other pros & cons that should be included and therefore considered?

Option	New (N) or Amend (A)	Suggested change and reasoning
1	N	Guidance Notes need to be provided that will give a better interpretation of the use of the QU. This is particularly true for QU requirements and operational rules.
2	A	Indoor facilities should not necessarily consist of a separate building if it can be shown that animals are kept completely apart and do not share air space
3	A	Double fencing with a separation of 3m would be acceptable in an open field but if there are barriers in place (such as hedges or walls) that prevent nose to nose contact with neighbouring stock then that should be accepted as sufficient for separation.
4	A	The individual identification of animals entering a QU is excessive and overly burdensome. It will inhibit participation.
5	A	Farmers entering a QU to observe their stock should not necessarily have to adhere to the full cleansing and disinfecting requirements proposed. Clearly if stock is being handled then farmers must adhere to those processes. Measures need to be proportionate to the level of risk.
6	A	It should not be necessary for vehicles transporting animals into a QU to be cleansed and disinfected on the way in to a QU.
7	A	QU Operational rules in general should be proportionate to the risk of disease spread. They need not be as rigorous as outlined in the consultation if we are to encourage participation.
8	N	In-use inspection should be undertaken by accredited certification bodies as part of UKAS accreditation to make the process of in-use inspection more efficient, more cost effective and less burdensome
9	N	Farmers should be able to notify that the QU was in-use electronically without reporting the individual identity of animals moved

4 Changes to the Disease Control (Wales) Order 2003 – your views are being sought as to whether you agree or otherwise with the proposed changes.

We **AGREE** with the changes that are required to amend the DCO to enable QU to be introduced, save for the changes that WLBP would like to see made to the QU proposals

From: William Williams-Wynne <www@wynne.co.uk>

Sent: 10 December 2015 09:06

To: animaldiseases

Subject: Six day Standstill

Follow Up Flag: Follow up

Flag Status: Completed

Thank you for allowing me to comment.

Allowing the use of Quarantine Units would be especially helpful on larger holdings which because of their size have

- i) more on-farm opportunities to quarantine incoming/outgoing animals and
- ii) a need for a greater number of animal movements.

Our management policy here has been greatly impacted having to forward plan sales to fit in with market sales and purchases (eg Draft ewes and Ram sales & purchases in Autumn). These on & off movements which of necessity often have to occur on the same day have been a nightmare. QUs would be a welcome change, but please do not make it even more complicated.

WWW