

## SUMMARY OF FORMAL RESPONSES TO CONSULTATION ON REVISED BRUCELLOSIS TESTING REGIME

RESPONDENT	SUMMARY OF COMMENTS
<p><b>Ai Services (NI) Ltd.</b></p>	<p>The company confirmed as follows:-</p> <ul style="list-style-type: none"> <li>• They agree that the Department should proceed on the basis of Option 3 (i.e. implementing proportionate relaxations with separate arrangements for beef and dairy herds on the basis of risk assessment).</li> <li>• In light of the generally positive responses to our earlier consultation (on the relaxation of pre-movement testing controls for brucellosis through to their possible removal), they agree that removal of pre-movement testing controls should be effected in advance of our attaining Officially Brucellosis Free (OBF) status on the grounds of cost savings to both farmers and taxpayers.</li> <li>• In view of our flexibility under Council Directive 64/432/EEC to extend biennial testing to all beef herds in advance of our attaining OBF status, they agree that we should proceed to extend biennial testing to such herds in advance of our attaining OBF status.</li> </ul> <p>The company made no comment on the draft Regulatory Impact Assessment (RIA) (covering the potential economic impact of the proposals for a revised brucellosis testing regime on farmers) or on the related Equality Screening Document.</p>

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<p><b>Ulster Farmers' Union (UFU)</b></p>	<p>The UFU confirmed as follows:-</p> <ul style="list-style-type: none"> <li>• They agree that the Department should proceed on the basis of Option 3 (i.e. implementing proportionate relaxations with separate arrangements for beef and dairy herds on the basis of risk assessment).</li> <li>• In light of the generally positive responses to our earlier consultation (on the relaxation of pre-movement testing controls for brucellosis through to their possible removal), they agree that removal of pre-movement testing controls should be effected in advance of our attaining OBF status on the grounds of cost savings to both farmers and taxpayers.</li> <li>• In view of our flexibility under Council Directive 64/432/EEC to extend biennial testing to all beef herds in advance of our attaining OBF status, they agree that we should proceed to extend biennial testing to such herds in advance of our attaining OBF status.</li> <li>• They agree that the analysis of the evidence given in the draft RIA accurately describes the potential economic impact of the proposals for a revised brucellosis testing regime on farmers.</li> </ul> <p>They had no comment to make on the related Equality Screening Document.</p>

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Dairy UK	<p>Dairy UK confirmed as follows:-</p> <ul style="list-style-type: none"> <li>• They agree that the Department should proceed on the basis of Option 3 (i.e. implementing proportionate relaxations with separate arrangements for beef and dairy herds on the basis of risk assessment).</li> <li>• They did <u>not</u> comment on the proposed removal of pre-movement testing controls in advance of our attaining OBF status.</li> <li>• In view of our flexibility under Council Directive 64/432/EEC to extend biennial testing to all beef herds in advance of our attaining OBF status, they agree that we should proceed to extend biennial testing to such herds in advance of our attaining OBF status.</li> <li>• They agree that the analysis of the evidence given in the draft RIA accurately describes the potential economic impact of the proposals for a revised brucellosis testing regime on farmers.</li> <li>• They agree that our policy proposals as screened in terms of equality will not have any differential impact on the Section 75 groups.</li> </ul>

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<p><b>British Veterinary Association (BVA) - NI Branch</b></p>	<p>The BVA (NI Branch) confirmed as follows:-</p> <ul style="list-style-type: none"> <li>• They noted DARD’s preferred Option 3 as offering the best balance between addressing the level of risk of an outbreak remaining undetected and achieving a proportionate saving to both farmers and taxpayers on the other.</li> <li>• They fully supported DARD’s proposal to take a risk-based approach to implement proportionate relaxations to the current surveillance regime.</li> <li>• In line with their 2014 response to DARD’s proposals for the relaxation of brucellosis pre-movement testing, they supported the assessment that it would be premature to abolish pre-movement testing at that stage.</li> <li>• Once OBF status was obtained, they viewed it to be reasonable to consider further relaxations in a phased approach through to possible abolition.</li> <li>• Whilst supporting the principle of taking steps to provide proportionate cost savings to both farmers and taxpayers, they urged caution on the suggestion that pre-movement testing controls should be removed entirely before OBF status is obtained.</li> <li>• They urged similar caution with regard to the proposed move to biennial testing for beef herds before OBF status is obtained.</li> </ul>

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<p><b>British Veterinary Association (BVA) - Northern Ireland Branch (cont.)</b></p>	<ul style="list-style-type: none"> <li>• Whilst they supported DARD’s proposed move to a risk-based approach and proportionate relaxation, they believed that farmers and veterinarians must remain vigilant and any premature changes in advance of obtaining OBF status could send out the wrong messages.</li> <li>• They were cautiously optimistic that NI would be declared OBF (a testament to how vets, farmers and government here determinedly set out to eradicate this disease), but take the view that there was still some way to go before OBF status is achieved and compliance with current testing requirements must continue to be ensured.</li> </ul> <p>They made no comment on the draft RIA (covering the potential economic impact of the proposals for a revised brucellosis testing regime on farmers) or on the related Equality Screening Document.</p>
<p><b>Law Society of NI</b></p>	<p>Nil Return</p>