

Consultation on Draft Northern Ireland Animal Health and Welfare Strategic Framework

Summary of Responses



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1. INTRODUCTION

- 1.1. On 6 August 2019, the Department of Agriculture, Environment and Rural Affairs (the Department) launched an eight week consultation on proposals for a Northern Ireland (NI) Animal Health & Welfare Strategic Framework. A sub-group of the Animal Health and Welfare Stakeholder Forum (AHWSF), comprising seven members representing sectoral and industry interests in animal health and welfare, worked alongside Departmental officials in the development of the proposed Framework.
- 1.2. The consultation paper set out a series of proposals for the Framework relating to:
- a new approach to the development and delivery of animal health and welfare policy in NI;
 - a long-term framework approach;
 - the adoption of an outcomes-based accountability (OBA) model;
 - the scope;
 - the outcomes and indicators to be used;
 - guiding principles;
 - implementation - an annual planning, monitoring and reporting cycle; and
 - oversight and stakeholder engagement.
- 1.3. The consultation was promoted via a press release, social media, the Department's website and correspondence issued to a wide range of Departmental stakeholders. Consultees were invited to respond to the consultation online on the NI Government consultation tool 'Citizen Space' at consultations.nidirect.gov.uk. The consultation and related screening documents remain available on the Department's website ([DAERA Consultation Paper - Draft NI Animal Health & Welfare Strategic Framework](#)).
- 1.4. The AHWSF was kept apprised of the development of the draft Framework and a presentation on the consultation paper was delivered at its meeting on 5 September 2019. The consultation closed on 30 September 2019.
- 1.5. The Department wishes to thank the members of the AHWSF sub-group who contributed to the development of the Framework proposals and all stakeholders and members of the public who took the time to respond to the consultation.

Consultation Responses

- 1.6. In total, 36 responses were received. Twenty of these came from charities, representative bodies, political parties/elected representatives, local government

or industry. In this report, the comments submitted by these bodies or organisations are, in general, directly attributed to them. The remaining 16 responses were received from individuals or private businesses (including farms and veterinary practices) and have been treated anonymously. **Appendix A** provides a list of the organisations and individuals who agreed to be named as respondents to the consultation. **Appendix B** provides a breakdown of responses by stakeholder category.

- 1.7. No comments were received in relation to the Equality Impact or Rural Needs screening exercises. One letter of complaint was received during the consultation period regarding the handling of the consultation which was addressed through correspondence.

Presentation of consultation findings

- 1.8. This paper provides a summary of the consultation responses. It should be noted that it is not intended to be a comprehensive report of every view expressed but rather a broad summary of the key issues raised by respondents. The tables in **Appendices C** and **D** provide a breakdown of the responses to the 'closed' questions set out in the consultation paper. The Department's response to the issues raised by consultees is also provided in this paper.
- 1.9. In a number of cases, respondents focused feedback on the questions set at the beginning of the consultation paper with subsequent answers re-iterating responses to previous questions. Some stakeholders did not respond to individual questions but provided a general response. In such cases, where possible, comments have been considered under the most relevant question. Many of the comments and suggestions relate to implementation of the Framework and will be given further consideration as part of the implementation process.

2. KEY FINDINGS

- 2.1. Overall, the proposals were favourably received. The need for a new approach to developing and delivering animal health and welfare policy in NI secured agreement from the largest number of respondents (89%). Other proposals relating to the introduction of an annual cycle of planning, monitoring and reporting and to key principles that guide the way stakeholders work together were strongly supported (by 83% and 81% of respondents respectively).
- 2.2. The introduction of a long-term framework with a lifespan of ten years and the proposals for oversight and stakeholder engagement were also broadly welcomed (by 72% of respondents in each case). Some respondents did, however, suggest that the lifespan of the Framework should be reduced or that there should be an interim review. Issues were raised in relation to representation on the proposed oversight body and the potential duplication of existing groups and bodies.
- 2.3. There was a general acknowledgement of the benefits of adopting an OBA model. Respondents were largely supportive of the proposed outcomes albeit 22% of them neither agreed nor disagreed with the outcomes as a set. The main concern appears to relate to proposed Outcome 2: *We have a competitive, innovative livestock industry that contributes to our economic prosperity*. Some 39% of respondents felt that this outcome should be amended or excluded. Suggestions included making reference in this outcome to animal welfare, environmental sustainability, productivity or profitability. The inclusion of the other four proposed outcomes secured at least 83% support for each. The inclusion of the proposed indicators, which aim to help measure progress towards achieving the outcomes, was also favoured by at least 83% of respondents in each case.
- 2.4. The proposals made in relation to the scope of the Framework generated the most negative responses - almost 40% of respondents stated they did not agree with the scope. The main issue raised was that the Framework was primarily concerned with farmed livestock. Several respondents felt that companion and wild animals were largely excluded and that there was insufficient focus on animal welfare.

3. SUMMARY OF CONSULTATION FEEDBACK AND DEPARTMENTAL RESPONSE

(I) A new approach to developing and delivering animal health and welfare policy in NI

Consultation Question 1:

Do you agree that a new approach to developing and delivering animal health and welfare policy in Northern Ireland is needed?

Please provide any comments you would wish to make to support your response.

Consultee responses

- 3.1. There was strong support for a new approach to developing and delivering animal health and welfare policy in NI. Of the 36 responses received, 32 (89%) responded 'yes' to Question 1, two responded 'no' and two did not provide an answer.
- 3.2. Animal Health and Welfare NI (AHWNI) recognised the need to integrate approaches to animal health and welfare and to address commonalities between disease risks; it was felt that the current approach could be fragmented with limited cross-cutting coordination. Blue Cross and Cats Protection welcomed the increased focus on stakeholder engagement, joined-up working and collaboration, and suggested that this is particularly important with regard to animal welfare.
- 3.3. A number of respondents, including the British Veterinary Association NI (BVA) and the National Office for Animal Health (NOAH), referred to the importance and timeliness of the proposed Framework in the context of EU exit. NOAH noted that livestock farming would need additional resilience and increased competitiveness to access export markets and thrive into the future. Respondents such as Dogs Trust and Sinn Féin cited the need for the Framework to consider the island of Ireland as a distinct epidemiological unit, especially with regard to disease surveillance and outbreak preparedness. Sinn Féin also expressed the view that the *2010 All-Island Animal Health and Welfare Strategy* should be reviewed and should underpin the proposed Framework.
- 3.4. In response to this question, some respondents drew particular attention to the potential impact of intensive farming practices and production on animal welfare and the environment. The SDLP expressed concern about the policies promoted in *Going for Growth* and the contribution of intensive farming to rising levels of ammonia and nitrogen. Individual respondents contended that:

- The current framework is ill-equipped to deal with the growing number of factory farms.
 - Intensive farming conditions and agricultural policies (such as the single farm payment) have increased livestock intensity, causing animal stress and pollution and endangering animal and human health through increased antibiotic resistance and heightened risk of potential virus cross-over.
 - Issues relating to animal husbandry, biosecurity practices, farm checks, the transport of live animals, controls in abattoirs, rehoming of animals taken out of food production and supermarket labelling need to be addressed.
- 3.5. Several respondents, including the Ulster Society for the Prevention of Cruelty to Animals (USPCA), Dogs Trust, BVA and a number of individuals, considered that there is an over emphasis within the proposed Framework on farmed animals and production. In contrast, however, they felt there is insufficient focus on animal welfare, companion animals, wildlife and environmental issues. These concerns were also reflected in the responses received to questions relating to other proposed aspects of the Framework.
- 3.6. Issues were raised about the welfare of companion and other animals, including the abandonment of pets, puppy farms, the control of pounds, the control and regulation of charities, hunting with hounds and the racing, breeding and export of greyhounds. League against Cruel Sports and Crosskennan Lane Animal Sanctuary referred specifically to safeguarding animal welfare and enforcing legislation. They also questioned the representativeness of the sub-group involved in developing the Framework proposals, suggesting that it had little or no representation relating to companion animals.
- 3.7 The Equine Council for NI agreed with the new approach, expressing the view that the present system in place for equines leaves a lot to be desired. Other comments received suggested that, at present, animal welfare is adequately addressed (two individual respondents) and that there may be a case for deregulation, for example as a result of EU exit, to make it easier for agriculture to maintain supply chains towards end markets.

Departmental Response

- 3.8. The Department recognises the need to address issues relating to animal health and welfare in NI in a more joined-up and evidence-based way and welcomes the overwhelming support of respondents for the proposed new approach. It considers that effective engagement, close collaboration and partnership working - with industry and farming bodies, animal welfare organisations, veterinarians and

other parts of central and local government - is fundamental to the implementation of this new approach.

- 3.9. The Department also notes the concerns that have been raised by respondents, in particular with regard to animal welfare and companion animals. It is proposed to address these issues by refining the scope and principles that govern delivery of the Framework and through improved stakeholder engagement. This engagement will include developing appropriate indicators to help measure progress on achieving the Framework outcomes.

(II) A long-term framework approach

Consultation Question 2:

Do you agree with the proposal to introduce a long-term framework approach, with a lifespan of ten years, for developing and delivering animal health and welfare policy in NI?

Please provide any comments you would wish to make to support your response.

Consultee responses

- 3.10. There was broad support amongst respondents for the proposal to introduce a long-term framework with a lifespan of ten years. Twenty-six respondents (72%) agreed with this proposal while eight were not in agreement and two did not answer the question.
- 3.11. Many of those in favour were of the opinion that a long-term perspective is required to enable planned and sustainable change. Several recognised the need for the Framework to be responsive and flexible and for ongoing monitoring and review at appropriate intervals. The SDLP acknowledged that a long-term approach seemed sensible, so long as it is not used to defer addressing current serious issues relating to animal health and welfare. Another individual respondent agreed with the proposal, provided it is not adopted at the expense of making business less efficient through the introduction of more administrative changes.
- 3.12. Although in favour of a long-term approach, the USPCA considered the proposed ten year timeframe to be too long and suggested that consideration should be given to a five year Framework. This view was shared by League against Cruel Sports and Crosskennan Lane Animal Sanctuary, both of which also advocated a shorter five year lifespan, citing how rapidly variables regarding animal health and welfare can change. One individual suggested that the lifespan of the Framework needed to be

shorter with reviews built in every three years to allow for the flexibility to meet needs as they develop.

Departmental Response

- 3.13. The Department welcomes strong stakeholder support for a long-term animal health and welfare framework. The framework approach recognises the need for flexibility and adaptability, which several respondents identified as necessary in order to be responsive to changing circumstances and new problems that may arise. An annual cycle of planning, monitoring and reporting will enable a process of ongoing review and revision and ensure the Framework's continued relevance over its ten year lifespan.

(III) Adopting an OBA model

Consultation Question 3:

It is proposed that this Framework should adopt the outcomes-based approach. What benefits or challenges do you feel should result from this approach?

Consultee responses

- 3.14. Feedback on the adoption of the OBA model was received from 32 of the 36 respondents. There was general acknowledgement of the benefits of OBA. AHWNI noted that the outcomes-based model is increasingly preferred internationally in disease control and has the benefit of allowing for flexibility with the focus being on whether (not how) an outcome is achieved.
- 3.15. Other comments received included those from Blue Cross, which pointed to the need for rigorous collection and evaluation of data to ensure that outcomes are evidence-based. Dogs Trust stated that, to be effective, the OBA approach needs to be based on tangible and measurable outcomes, with agreed milestones and a mechanism for monitoring progression. Mid Ulster Council recommended that performance-measuring targets should not increase the regulatory burden on local stakeholders or councils and, where possible, should be taken from current monitoring regimes and/or statutory returns. Sinn Féin was strongly of the view that the outcomes would be best achieved if frameworks across the island were coordinated, which would help to deliver the ultimate outcome of ensuring the highest standard of animal health and welfare.

- 3.16. The SDLP was hopeful that the OBA approach would place greater importance on animal welfare certification schemes as part of food chain integrity and in the promotion of farm-level continuous improvement. A number of individual respondents, however, raised concerns about the compatibility of outcomes relating to production with those relating to animal welfare and the environment. Cats Protection advised that it would be delighted to have input into outcomes for cat welfare in NI.
- 3.17. Supporting the OBA approach, the Ulster Farmers Union (UFU) considered that it would give a clear focus to what stakeholders are trying to achieve. It did, however, express some concern about how appropriate outcomes and measures would be agreed between stakeholders who are not aligned, or are in competition, and about the resources required from both government and industry to monitor progress. It highlighted the need for clarity on the metrics used to determine and report on disease, citing the example of the TB eradication programme where the increased level of disease surveillance produced a trend that suggested increased disease levels. The USPCA also welcomed the OBA approach but noted that a ministerial decision may be required in circumstances where there is disagreement among stakeholders on priorities and desired outcomes. One individual respondent felt that an evidence-based and systematic OBA process should help reduce bias and direct efforts more effectively towards the desired outcomes.
- 3.18. Some respondents questioned whether implementation of the OBA approach would make any difference, with one individual suggesting that government would only record what it wanted to report on.

Departmental response

- 3.19. The Department acknowledges there will be challenges at the outset in moving the focus away from inputs and outputs towards measuring the difference that is being made and whether anyone is better off. It is intended to commence a process of detailed internal and external engagement to develop a robust, evidence-based monitoring framework. Internal engagement will take the form of discussions between Departmental veterinary, policy and operational staff, as well as economists, statisticians and scientists. Engagement with external stakeholders will include discussions with industry, academia, science and veterinary bodies, animal health and welfare representative groups / networks and other relevant public bodies.

(IV) Proposed Scope of the Framework

Consultation Question 4:

Do you agree with the proposed scope of the Framework?

Consultee responses

- 3.20. Of the 36 responses received, 19 (53%) agreed with the proposed scope of the Framework, 14 (39%) respondents did not agree with it and three did not answer the question. The Framework scope received the highest number of negative responses. In particular, there was concern that it is heavily focused on livestock and farmed animals with little emphasis on companion animals and welfare issues.
- 3.21. Blue Cross suggested widening the scope to include overarching issues such as responsible ownership. The BVA requested that due attention be given to achieving improved outcomes for companion animals and equines, exotic pets, zoos and free-ranging wildlife. The British Horse Society (BHS) pointed out that the Framework should extend to other animals, including horses kept by people as companions. Although it indicated agreement with the proposed scope, Dogs Trust advocated widening some aspects - for example, to include within the farmed animal section, alpacas, farmed deer and issues relating to livestock worrying, and expanding the wildlife section to include disease transmission to pets. The USPCA had reservations that animal welfare issues were not fully addressed and raised particular concerns relating to the need to address 'puppy farming' and potential disease transmission by hunts.
- 3.22. League against Cruel Sports and Crosskennan Lane Animal Sanctuary recommended that either the title of the Framework should reflect its focus on farmed animals or its scope should be expanded to include all animals. They also felt that wild animals, in particular, are let down by those responsible for enforcing legislation. One individual stated that the Framework is most likely to concentrate on profitability for the farmer which, it was contended, would not lead to the most humane treatment for animals, and stressed that there should be a balance between ecology, respect for animals, minimal medication and farmer income.
- 3.23. Several other respondents provided recommendations for expanding or clarifying the scope. Mid Ulster Council requested that current gaps in policy should be identified - for example, it felt that the keeping of goats could be considered as relating to either livestock or companion animals, depending on the context in which they are kept. Moy Park suggested that, from a poultry perspective, the scope should include backyard / hobby / show flocks, due to their potential impact on

commercial industry in terms of epizootic disease. One respondent felt that the fishing sector was not adequately addressed and that the proposed scope appeared to exclude fishing for sport.

- 3.24. The need to ensure bee health is addressed was raised by NOAH and AHWNI. Furthermore, NOAH noted the inclusion of veterinary medicine and animal feed within the scope and suggested that there is an opportunity to look at the positive role of veterinary medicines in achieving all of the identified outcomes. It recommended alignment with Responsible Use of Medicines in Agriculture (RUMA) targets and leading farm assurance standards.
- 3.25. The UFU had some concern that, in creating such a broad framework, there may be a reprioritisation of work streams which could be to the detriment of targets that industry is already working towards. It acknowledged, however, that the scope is limited to those areas within which the Department's Veterinary Service Animal Health Group (VSAHG) operates.

Departmental response

- 3.26. The consultation document sets out the proposed scope of the Framework, which extends only to policy areas for which the Department's VSAHG has responsibility. Although the majority of respondents agreed with the scope, the Department acknowledges that almost 40% took issue with this aspect of the Framework.
- 3.27. It has always been the Department's intention that - as well as farmed animals - companion animals, animals used for sport, recreation or display, wildlife (where there is a risk of disease transmission to farmed animals or humans) and aquaculture would be included within the Framework's scope. The scope will, therefore, be amended to clarify that the focus of the Framework is not predominantly on farmed animals.

V. Animal Health & Welfare Outcomes and Indicators

Consultation Question 5:

- (i) Do you think that the 5 proposed outcomes work as a set? Please provide any comments you would wish to make to support your response.
- (ii) For each individual outcome, please let us know whether it should be included (kept), excluded (removed) or amended. Please provide any comments you would wish to make to support your response.
- (iii) For each individual indicator, please let us know whether it should be included (kept), excluded (removed) or amended. Please provide any comments you would wish to make to support your response.

Consultee responses

The five proposed animal health and welfare outcomes - do they work as a set?

- 3.28. Of the 36 responses received to the question whether the five proposed outcomes work as a set, 23 (64%) answered 'yes', five responded 'no' and eight did not provide an answer.
- 3.29. The responses were largely supportive of the proposed outcomes although, compared to other aspects of the Framework, there was a greater degree of uncertainty with 22% of respondents neither agreeing nor disagreeing with the outcomes as a set.
- 3.30. The BVA welcomed the principle position given to the outcome most directly focused on the health and wellbeing of animals, as well as supporting the other outcomes. NOAH stated that the outcomes work well together and cover the impact that comprehensive animal health and welfare policy should deliver, while the Ornamental Aquatic Trade Association (OATA) welcomed the focus on impact rather than delivery.
- 3.31. Cats Protection supported high animal welfare standards for all species and, as cats are carnivores, was concerned about biosecurity in the meat industry. Dogs Trust did not believe there is sufficient emphasis on the welfare of companion animals within the proposed outcomes. It suggested that they should be amended to be specific and measurable with a greater focus on animal health and welfare.
- 3.32. Sinn Féin advocated adding an outcome relating to equivalent standards on the island of Ireland and one on having the highest standards of animal health and welfare underpinning our growing agriculture economy. The SDLP expressed the

view that the outcomes needed to reflect the NI position and requirements post Brexit, pointing out that achieving the balance between an innovative livestock industry and animal welfare standards and the environment is a serious issue. An individual respondent had concerns that collaboration between government and industry would not work.

- 3.33. Both League against Cruel Sports and Crosskennan Lane Animal Sanctuary disagreed with the set of proposed outcomes, stating that the focus is on farmed animals with inadequate provision for companion and wild animals. They felt that there was little consideration given to biosecurity, particularly in the case of mounted hunts. One individual respondent suggested that animal welfare and sustainability were not sufficiently addressed. Another individual respondent contended that *factory farmed animals are not happy animals* and questioned 'Red Tractor' as a standard, suggesting independent, unannounced third party inspections of farms are required. Another respondent, however, considered it important to partner current welfare schemes such as 'Red Tractor' and larger retailers of meat like McDonalds.
- 3.34. Additionally, an individual respondent provided an overview of how agriculture could be *completely revamped*, making the case for small farms, raising heritage breeds and rotational grazing of cattle and sheep. Another suggested that farmers should be encouraged to move away from livestock-based agricultural production.

Individual animal health and welfare (AHW) outcomes

- 3.35. Although respondents were largely in favour of the proposed outcomes, the main concern appears to relate to Outcome 2: *We have a competitive, innovative livestock industry that contributes to our economic prosperity*, with some 39% of respondents suggesting that this outcome should be amended or excluded. The other four proposed outcomes each secured at least 83% support for their inclusion. A breakdown of responses relating to the inclusion of individual outcomes is provided in **Appendix D**.

Outcome 1: We keep our animals healthy and treat them well *(Inclusion supported by 83% of respondents)*

- 3.36. Six respondents suggested that this outcome should be amended. Blue Cross regarded the outcome as vague and said a reference should be included to ensuring *a good quality of life for each animal*. Cats Protection recommended that the outcome be amended to: *We keep our animals healthy, treat them well and meet their welfare needs*, whilst Dogs Trust suggested expanding the outcome to include *providing a good life worth living for the animals*. The USPCA proposed that

Outcomes 1 and 5 be combined to produce a strengthened outcome: *We have trusted animal health and welfare standards which ensure our animals are healthy and treated well.*

- 3.37. One respondent contended that animal welfare is important but *should not be blindly followed to the exclusion of all else* and *maybe should not even be the highest priority*. Another suggested, however, that *animal welfare should take priority over all else*.

Outcome 2: We have a competitive, innovative livestock industry that contributes to our economic prosperity.

(Inclusion supported by 58% of respondents)

- 3.38. Eleven respondents suggested that this outcome should be amended and three that that it be excluded. Dogs Trust proposed that a reference to ensuring that there is no negative impact on livestock welfare should be included. League against Cruel Sports and Crosskennan Lane Animal Sanctuary recommended that the wording *without compromising the health and welfare of farmed animals* be added at the end of the statement.
- 3.39. NOAH proposed including *productivity* and *resilience* within this outcome. The UFU made the case that the word *competitive* should be amended. It suggested instead including *successful*, *thriving* or *profitable*, stating that animal health and welfare must be market and consumer focused and that lobbying by a minority of consumers can result in legislative changes that affect the entire production chain and add costs for industry, with local producers then unable to compete on price.
- 3.40. One respondent considered the word *economy* too broad and another suggested the wording: *We have a competitive, innovative livestock industry that contributes to an environmentally sustainable level of economic prosperity*, for this outcome.

Outcome 3: We protect public health and our food from animal-related disease.

(Inclusion supported by 89% of respondents)

- 3.41. Four respondents suggested that this outcome should be amended. Dogs Trust recommended expanding on it to ensure animals are protected from disease, which it proposed could be through mandating appropriate preventative healthcare plans.

Outcome 4: We take a sustainable approach to the farming of animals that respects the environment.

(Inclusion supported by 86% of respondents)

- 3.42. Four respondents suggested that this outcome should be amended and one that it is excluded. One individual questioned its relevance and suggested it would sit well

within an environmental or economic strategy but not one for animal welfare. Dogs Trust recommended that there should be some explanation as to what is meant by a sustainable approach to farming and measurements respecting the environment.

Outcome 5: We have animal health and welfare safeguards that are widely recognised and trusted.

(Inclusion supported by 86% of respondents)

- 3.43. Five respondents suggested that this outcome should be amended. Dogs Trust stated that *recognised and trusted* be expanded to include effective monitoring and enforcement. Another respondent stated: *We need to be better than recognised and trusted - we also need to make sure we 'police' the 'trusted!'* The USPCA proposed combining this outcome with Outcome 1 (see suggested wording set out under Outcome 1).

Individual animal health and welfare (AHW) indicators

- 3.44. With regard to the AHW indicators, there was general support - from at least 83% of respondents - for the inclusion of each individual indicator.
- 3.45. There was a small number of suggestions for amendments and the inclusion of additional indicators, a number of which relate to animal welfare concerns. BVA agreed with the indicators but suggested that the detail is overly focused on production animal sectors - for example, antibiotic usage (proposed fourth indicator) could incorporate the companion animal sector - and pointed to the need to broaden the traditional view of animal welfare beyond measures of physical health to incorporate equally important determinants, such as behavioural aspects. The BVA requested the opportunity to input to indicators and also suggested that, with EU exit, it might be appropriate to include measures relating to coordination of activities with other jurisdictions.
- 3.46. Cats Protection proposed an additional indicator: *Enforcement of animal welfare legislation where there is a breach*. Dogs Trust suggested that indicators of direct relevance to animal welfare should be included and parameters set to allow these to be measured, monitored and enforced. It advised that it would be happy to support the Department in their development. League against Cruel Sports and Crosskennan Lane Animal Sanctuary stated that livestock mortality and compliance with animal welfare legislation should be dealt with more seriously, with more investigations, monitoring and evidence-gathering procedures required for repeat offenders.
- 3.47. The USPCA stated that the indicators did not cover all the desired outcomes and questioned whether there is a need for an indicator which references compliance

- with environmental legislation (linked to Outcome 4). It also indicated that it would like to see higher standards of animal welfare, perhaps through the establishment of a voluntary standards scheme, with an indicator then established for members signed up to the scheme.
- 3.48. Other suggestions to amend the indicators include AHWNI's proposal that the second indicator be reworded to: *Incidence and **prevalence** of enzootic disease* since, for some infections where there is no mandatory removal of animals, measures of prevalence may be more applicable than incidence.
- 3.49. With reference to the indicator relating to *Controls for Animal Identification, Registration and Movement*, it was suggested by the Equine Council of NI that the movement of equines should be excluded. Another individual respondent suggested that the movement of animals *not in the food chain* should be facilitated, while one respondent commented: *With our fragmented farms it will be challenging to control TB without strong movement and ID requirements.*
- 3.50. Moy Park noted that the poultry industry is well protected with strict biosecurity standards and protocols but requires government to continue to provide surveillance and maintain an accredited laboratory facility. It was stated that the poultry industry has led the way in working collaboratively with government and it was suggested that emergency preparedness for disease outbreak needs further testing.
- 3.51 NOAH agreed that all the indicators should be kept but felt that others should also be considered - such as vaccine, teat sealant and pain relief usage; skills development for farmers (closely linked to productivity and competitiveness); participation in endemic disease control schemes and improvements made to biosecurity and farm buildings.

Departmental response

- 3.52. Respondents were broadly in favour of the proposed outcomes, although some concerns were expressed about a lack of focus on animal welfare. The Department notes these concerns but feels that the wording of Outcome 1, which refers to treating our animals well, addresses animal welfare issues and meeting animal needs. Several respondents raised issues relating to Outcome 2, with almost 40% stating that this outcome should be amended or excluded. Suggestions included adding a reference to animal health and/or welfare and environmental sustainability. It is the Department's view, however, that the outcomes are inter-related and, as they are presented as a set, welfare and environmental sustainability are covered by Outcomes 1 and 4 respectively, and Outcome 5. There were also suggestions that other adjectives could be used to present a more

positive view of the livestock industry; the Department feels that the wording drafted for Outcome 2 represents a balanced approach.

- 3.53. There was wide support for the inclusion of each of the proposed indicators. A number of suggestions were forwarded to expand them or to include additional indicators. The indicators presented are not exhaustive and substantial work will be required both internally within the Department and with stakeholders in order to agree them. Appropriate and measurable indicators will contribute to a robust and evidence-based approach to monitoring and review.

(VI) Guiding Principles

Consultation Question 6:

- (i) Do you think the proposed guiding principles work as set?

Please provide any comments you would wish to make to support your response.

- (ii) For each individual principle, please let us know whether it should be included (kept), excluded (removed) or amended. Please provide any comments you would wish to make to support your response.

Consultee responses

The proposed guiding principles - do they work as a set?

- 3.54. It was generally agreed that the proposed guiding principles work well as a set. Of the 36 responses received, 29 (over 80%) responded 'yes' to this question, six responded 'no' and one did not provide an answer. Sinn Féin recommended the addition of the principle of cooperation with the Department of Agriculture, Food and the Marine (DAFM) and the sector in the Republic of Ireland (RoI). The USPCA agreed with the list *with the proviso that they are regarded as a set and not as an à-la-carte menu*. Individual respondents stated that *they appear comprehensive and detailed and they are comprehensive and do indeed work together*.
- 3.55. Cats Protection considered that adequate resources for effective enforcement needs to be included as an additional principle. Dogs Trust suggested that a greater focus on animal welfare within the guiding principles is required and an acknowledgement that there will always be a cost element to ensuring appropriate and adequate welfare standards are met.

Individual guiding principles

3.56. There was wide support for each of the individual guiding principles. The breakdown of responses relating to the inclusion of each guiding principle is provided in **Appendix D**.

P1 - Prevention is better than cure

(Inclusion supported by 91% of respondents)

3.57. This guiding principle enjoyed the support of the largest number of respondents, with 33 agreeing to its inclusion. Dogs Trust stated that for animal welfare legislation to be preventative, it needs to be proactively and effectively enforced. League against Cruel Sports and Crosskennan Lane Animal Sanctuary stated that there should not be a selective approach to applying this principle, particularly with regard to biosecurity. NOAH pointed out that it already adopts this principle, which has led to its farmer training programme on the use of veterinary medicines, including antibiotics, on farms.

P2 - 'One Health'

(Inclusion supported by 81% of respondents)

3.58. The inclusion of this guiding principle was widely supported. BVA welcomed, in particular, the commitment to embed a 'One Health' approach in the Framework. Dogs Trust agreed with this principle but advocated that companion animals are actively included; it contended there is an overlap between livestock and companion animals in a number of areas, including antimicrobial resistance (AMR) and their potential impact on human health.

P3 - Partnership and Collaborative Working

(Inclusion supported by 89% of respondents)

3.59. While content with the guiding principles, the UFU raised some concerns based upon its experience of TB eradication. In terms of this principle, it would like to see equal partnership to ensure government is not seen to be setting the priorities with little stakeholder engagement. It stated that industry would prefer a collaborative 'teamwork' relationship.

P4 - Accepting Roles and Responsibilities

(Inclusion supported by 89% of respondents)

3.60. The inclusion of this guiding principle was widely supported. Dogs Trust was concerned that the proposed wording leaves the burden of responsibility primarily on the keeper when issues such as disease outbreaks require appropriate surveillance and contingency planning by government. Moy Park also accepted that the responsibility for the health and welfare of animals on individual holdings

lies with the flock keeper but stated that, when the National Flock is threatened by disease, government is required to step in.

3.61. The UFU questioned the statement that *responsibility for animal health and welfare lies primarily with the keepers who are best placed to deal with many disease risks and issues*. It contended that producers feel that, due to the legislative framework surrounding wildlife, the role and responsibility in this area has been taken away from industry and, as such, industry is *shackled* in its efforts to address TB. The UFU contrasted this approach with that taken to BVD eradication, where industry has been able to take greater ownership over tackling the disease.

3.62. OATA commended the acknowledgment that responsibility for animal health and welfare lies primarily with the keepers, who play a key role in animal welfare, and stated that education is key to happy and healthy pets, rather than bans or restrictions which are hard to enforce.

P5 - Considering Costs and Benefits

(Inclusion supported by 75% of respondents)

3.63. Six respondents suggested amending this proposed guiding principle. AHWNI referred to *the onus on both government and industry to develop cost sharing frameworks for disease control*, stating that the *economics of disease* is a specialist discipline and that evidence is needed in support of current and future programmes. Dogs Trust contended that it is essential that keepers are appropriately educated on the link between good husbandry practices and proactive health management.

3.64 UFU broadly accepted this principle outside of the area of TB. When the discussion was framed within the context of TB, it was of the view that industry bears significant costs associated with eradication that do not appear to be quantified or recognised by the Department. They suggested that it is important that an initial cost benefit analysis is agreed by all parties and is subject to review if new information / evidence comes to light.

P6 - Strong and Reliable Evidence

(Inclusion supported by 86% of respondents)

3.65. The inclusion of this guiding principle was widely supported. Dogs Trust noted that it is immensely important for the future working of the proposed or any other framework for evidence to be peer reviewed. The OATA applauded its inclusion and supported decisions being made by robust and independent scientific evidence.

P7 - Effective Communications

(Inclusion supported by 86% of respondents)

- 3.66. Dogs Trust proposed that this guiding principle be amended and expanded to include the need for appropriate surveillance and to ensure implementation and standards are both effective and enforced.

Departmental response

- 3.67. The Department welcomes strong stakeholder support for the proposed guiding principles and the general acknowledgement that they work as a set. It is recognised, however, that a number of stakeholders have concerns relating to animal welfare, which they feel have not been adequately addressed in the proposed Framework. The Department will, therefore, reconsider the guiding principles from an animal welfare perspective.
- 3.68. The Department acknowledges that detailed cost/benefit analysis is needed for both statutory and non-statutory disease control and welfare strategies and programmes, which recognises the contributions made by government, industry and other stakeholders. The aim of the Framework is not only to ensure the adoption of a strong evidence base and cost/benefit (monetary and non-monetary) analysis to support decision-making but also the introduction of effective monitoring and review of indicators to help measure success and the progress made on achieving outcomes.

(VII) Implementation - annual planning, monitoring and reporting cycle

Consultation Question 7:

Do you agree with the proposal for an annual planning, monitoring and reporting cycle?

Consultee responses

- 3.69. There was strong agreement for the introduction of an annual planning, monitoring and reporting cycle. Of the 36 responses received, 30 (83%) responded 'yes', three responded 'no' and three did not answer this question.
- 3.70. A number of respondents (including AHWNI, Dogs Trust and Mid Ulster Council) recognised ongoing monitoring and review as essential but stressed that it should not be an overly onerous exercise nor increase regulatory burdens. The UFU noted that the proposed cycle is acceptable but may need to be reviewed after trialling.

The USPCA highlighted the need for existing strategies and action plans to be aligned with and incorporated into the delivery plan. Another respondent emphasised that the process must be robust and accountable and as up to date as possible.

- 3.71. A number of individual respondents made suggestions for planning and reporting timeframes - one suggested every two to five years from an administrative cost perspective and to fit in with long-term planning. Two other individuals recommended more frequent reporting than is proposed. It was also suggested that plans and reports should be made fully accessible to all respondents to the consultation. Issues relating to animal welfare and enforcement, including the inspection and monitoring of establishments, were raised in three individual submissions.

Departmental response

- 3.72. The Department welcomes strong stakeholder support for an annual planning, monitoring and reporting cycle that can be responsive to changing circumstances and incorporates existing animal health and welfare strategies and action plans into the annual planning process. Concerns raised by some respondents that this proposal should not place an additional resource or administrative burden on stakeholders are acknowledged. The Department's aim is not, however, to add a further layer of monitoring and reporting but rather to streamline the process and integrate it with other reporting cycles (including the cross-departmental Outcomes Delivery Plan).

(VIII) Oversight and Stakeholder Engagement

Consultation Question 8:

Do you agree with the proposals, including the interim proposal, for the oversight of Framework delivery and the proposed approach to stakeholder engagement?

Consultee responses

- 3.73. There was general endorsement of the proposals relating to oversight and stakeholder engagement. Of the 36 responses received, 26 (72% of respondents) were in favour of the proposals, seven responded 'no' (19%) and three did not provide an answer to the question.

- 3.74. Organisations in support of the oversight proposals for the Framework included BVA, Dogs Trust, Cats Protection and NOAH, all of which considered that a body with an advisory role would help build effective working relationships between government and industry. There were a number of suggestions as to the most effective model. Some respondents proposed that existing groups and representative bodies could be utilised to access stakeholder views. AHWNI commented that there are already significant resources available that could be used to feed advice and information into the decision-making process - for example, there are already well established all-island Technical Working Groups for endemic cattle disease. The BVA recommended utilising its expertise when considering veterinary-related issues. Cats Protection referred to the recent formation of a working group on companion animal welfare in NI and suggested that it be formalised as a sectoral stakeholder sub-group feeding into the proposed partnership body on issues relating to companion animals.
- 3.75. NOAH welcomed the development of cross sector expert groups to tackle key issues such as biosecurity, AMR and trade but felt that efforts should be made to ensure expert groups operate in a transparent manner, use evidence-based approaches and consult with wider industry. The SDLP stated that stakeholder engagement is very important but highlighted that specific interests should not be allowed to override best practice.
- 3.76. Although strongly in support of the creation of a partnership body, Dogs Trust regarded it crucial that the partnership comprises independent experts with a full range of animal health and welfare expertise. It questioned whether the AHWSF sub-group, which contributed to the development of the proposed Framework, was sufficiently independent. OATA felt that the current stakeholder group lacked companion animal / pet representation and suggested contact should be made with the UK pet trade associations and the Companion Animal Sector Council for assistance on relevant trade and industry issues. League against Cruel Sports pointed out that organisations responsible for enforcement of welfare legislation, such as the PSNI for Wildlife Crime and the Animal Welfare Project Board for companion animal welfare, currently have no representation on the AHWSF.
- 3.77. A number of organisations were not in favour of the proposals for oversight and stakeholder engagement, including Sinn Féin, the UFU and the USPCA. Sinn Féin suggested that the proposal for the appointment of non-government members to a partnership body, who do not represent the interests of any particular group, organisation or sector, would *contradict the notion of true partnership working*. Furthermore, it had issue with the size of the proposed partnership given the broad scope of animal health and welfare and proposed that the AHWSF, with its wide range of representatives and sub-groups, provides a good model for partnership working. It also suggested that a representative from DAFM should be included in

- any partnership and asked that the Department organise an all-island event to discuss all-island animal health and welfare matters.
- 3.78. The UFU was of the view that the proposed size of the partnership body is too small and considered it would be impossible to identify four individuals with sufficient expertise to cover the scope. It was felt that there is potential for unequal representation between various issues that would be competing for prioritisation. In addition, the UFU was concerned about the proposed appointment process involving members being appointed as ‘individuals’ and not ‘representatives’ of industry. Instead, it favoured an oversight body comprising existing members, or a sub-group of the AHWSF (similar to the sub-group involved in the development of the draft Framework). If, however, the consultation proposals are implemented, it was suggested that the new partnership body should join the AHWSF so as not to further dilute stakeholder resources.
- 3.79. The USPCA felt that the role of the partnership body is ambitious in the context of a volunteer group of individuals without a budget. It questioned how such a group would be able to liaise effectively, disseminate information and communicate key messages to stakeholders. The USPCA was also of the view that there is no longer a requirement for quarterly meetings of the AHWSF and that a six monthly conference / meeting of stakeholders should be held instead of the proposed annual conference.
- 3.80. Two respondents stated that ‘stakeholders’ need to be considered more broadly to include the wider public, school children, urban residents, environmental, angling and conservation groups. It was also contended that some stakeholders (such as farmers, feed suppliers and abattoirs) have a vested interest in financial returns, with the environmental or human health impacts of less concern.

Departmental response

- 3.81. The Department acknowledges that, although the proposals relating to oversight and enhancing stakeholder engagement were broadly welcomed, there was concern expressed by a significant number of respondents about representation on the proposed partnership body and the potential duplication of existing structures. The Department intends to take forward its proposal for a partnership body through the public appointment process but recognises that there are already well-established technical working groups and bodies representing various interests (including welfare, companion animals and the production sectors). The Department will undertake further engagement with stakeholders to consider implementation and governance issues, including indicators, data development and whether new sub-groups or networks may be required.

- 3.82. A review of the AHWSF, carried out in 2018/19, demonstrated overwhelming support among members for its continued role in stakeholder engagement. It was agreed that the Forum would meet at least 3-4 times per year (with additional meetings arranged if required). It is envisaged that the Forum will provide a platform for discussion with stakeholders on the Framework's annual plan and monitoring reports, and sub-groups / technical advisory groups will have the opportunity to present on programmes and policies of relevance to particular sectors or of cross-sectoral importance.
- 3.83. The Department also intends to take forward its proposal for an annual Animal Health & Welfare Stakeholder Conference. The aim of the conference will be to facilitate engagement and sharing of information and experiences between stakeholders, and to contribute to horizon scanning and discussion on animal health and welfare priorities. Where possible, the conference will involve contributions from independent experts and government representatives from other administrations and countries (including Great Britain and RoI).

4. NEXT STEPS

- 4.1. Given the Department's current focus on EU transition preparedness and ongoing pandemic, a decision will be taken early in 2021 on the timing of the launch of the Framework. Once it is launched, it is envisaged that implementation will commence with focused stakeholder engagement and data development, with a view to introducing the first comprehensive OBA annual delivery plan for animal health and welfare in NI.

APPENDIX A: Consultation Respondents

Name of Respondent	Organisation
Sam Strain	Animal Health & Welfare NI
Richard Woodward	Blue Cross
Susan Spratt	British Horse Society (BHS)
Michael McGilligan	British Veterinary Association (BVA) NI
Jane Dykes	Cat Support Group
Madison Rogers	Cats Protection
Lyn Friel	Crosskennan Lane Animal Sanctuary
Hannah Evans	Dogs Trust
Geoff Cannon	Equine Council for NI
Richard Hambleton	Homes for Unwanted Greyhounds (HUG)
Janice Watt	League Against Cruel Sports
M G Kelso	Mid Ulster District Council
Peter Morgan	Moy Park
Grace O’Gorman	National Office Animal Health (NOAH)
Pauline Davey	Ornamental Aquatic Trade Association (OATA)
John Dallat	SDLP
Bronwyn McGahan	Sinn Fein
Dr Geoff Thompson	Ulster Farmers’ Union (UFU)
Brendan Mullan	Ulster Society for the Prevention of Cruelty to Animals(USPCA)
Mark Bailey	Individual
Laurenn Broderick	Individual
Shaw Harper	Individual
Shelagh Henry	Individual (Red Kite Tours NI)
Jerilyn Ingram	Individual (Willow Grove Farm)
Stephen Kennedy	Individual
Harriet Moore-Boyd	Individual
Liz Porter	Individual
Noelle Robinson	Individual
<i>Eight individuals / groups requested not to be named in this report</i>	

APPENDIX B: Respondents by Stakeholder Category

Stakeholder Category	Number
<i>Charities, representative bodies, political parties / elected representatives, local government and industry comprising:</i>	20
Elected Representative / Political Party	2
Equine Body / Horse Society	2
Large Business	1
Local Government	1
Farmer Representative Organisation / Industry Body	2
Residents Group	1
Trade Association	1
Veterinary Association / Veterinary Medicines	2
Animal Welfare Charity / Support Group	8
<i>Individuals and private businesses comprising:</i>	16
Farm / Farmer	3
General Public	11
Other Small Business	1
Veterinary Practice	1

APPENDIX C: Breakdown of Responses to each Proposal**(Total No. Respondents - 36)**

	Consultation 'Closed' Questions - Breakdown of Responses	Yes	No	No Ans.
Q1	Do you agree that a new approach to developing and delivering animal health and welfare policy in NI is needed?	32 (89%)	2 (6%)	2 (6%)
Q2	Do you agree with the proposal to introduce a long-term framework approach, with a lifespan of ten years, for developing and delivering animal health and welfare policy in NI?	26 (72%)	8 (22%)	2 (6%)
Q3	<i>Asked about perceived benefits or challenges resulting from the outcomes-based accountability (OBA) approach?</i>	<i>'Open' question</i>		
Q4	Do you agree with the proposed scope of the Framework?	19 (53%)	14 (39%)	3 (8%)
Q5	Do you think that the 5 proposed outcomes work as a set?	23 (64%)	5 (14%)	8 (22%)
Q6	Do you think that the proposed guiding principles work as a set?	29 (81%)	6 (17%)	1 (3%)
Q7	Do you agree with the proposal for an annual planning, monitoring and reporting cycle?	30 (83%)	3 (8%)	3 (8%)
Q8	Do you agree with the proposals, including the interim proposal, for the oversight of Framework delivery and the proposed approach to stakeholder engagement?	26 (72%)	7 (19%)	3 (8%)

Percentages may not add up to 100% due to rounding

APPENDIX D: Breakdown of Responses to individual Outcomes, Indicators and Guiding Principles

(Total No. Respondents - 36)

	Proposed Outcomes	Included	Excluded	Amended	No Ans.
O1	We keep our animals healthy and treat them well	30 (83%)	0	6 (17%)	0
O2	We have a competitive, innovative livestock industry that contributes to our economic prosperity	21 (58%)	3 (8%)	11 (31%)	1 (3%)
O3	We protect public health and our food from animal-related disease.	32 (89%)	0	4 (11%)	0
O4	We take a sustainable approach to the farming of animals that respects the environment.	31 (86%)	1 (3%)	4 (11%)	0
O5	We have animal health and welfare safeguards that are widely recognised and trusted.	31 (86%)	0	5 (14%)	0

Percentages may not add up to 100% due to rounding

	Proposed Indicators	Included	Excluded	Amended	No Ans.
I1	Livestock Mortality	30 (83%)	1 (3%)	4 (11%)	1 (3%)
I2	Incidence of Enzootic Disease	31 (86%)	0	3 (8%)	2 (6%)
I3	Freedom from Epizootic and Notifiable Zoonotic Disease	32 (89%)	1 (3%)	2 (6%)	1 (3%)
I4	Antibiotic Usage	31 (86%)	2 (6%)	2 (6%)	1 (3%)

	Proposed Indicators	Included	Excluded	Amended	No Ans.
I5	Compliance with Animal Welfare Legislation	31 (86%)	1 (3%)	3 (8%)	1 (3%)
I6	Controls for Animal Identification, Registration & Movement	32 (89%)	1 (3%)	2 (6%)	1 (3%)
I7	Emergency Preparedness	32 (89%)	0	3 (8%)	1 (3%)

Percentages may not add up to 100% due to rounding

	Proposed Guiding Principles	Included	Excluded	Amended	No Ans.
P1	Prevention is better than cure	33 (91%)	0	2 (6%)	1 (3%)
P2	'One Health'	29 (81%)	0	3 (8%)	4 (11%)
P3	Partnership and Collaborative-working	32 (89%)	0	3 (8%)	1 (3%)
P4	Accepting Roles and Responsibilities	32 (89%)	0	3 (8%)	1 (3%)
P5	Considering costs and benefits	27 (75%)	0	6 (17%)	3 (8%)
P6	Strong and reliable evidence	31 (86%)	0	1 (3%)	4 (11%)
P7	Effective Communications	31 (86%)	1 (3%)	1 (3%)	3 (8%)

Percentages may not add up to 100% due to rounding