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A consultation on the future delivery of scanning surveillance for animal related threats in England and Wales  

The Agriculture and Horticulture Development Board (AHDB) is a Non-Departmental Public Body, known as a ‘Levy Board’, funded by the agriculture and horticulture industries through statutory levies. AHDB is an independent, evidence-based organisation with the duty to improve the efficiency and competitiveness of various agriculture and horticulture sectors in parts of the UK representing about 75% of total UK agricultural output. AHDB serves the six sectors of: Pig meat in England; Beef and lamb in England; Commercial horticulture in Great Britain; Milk in Great Britain; Potatoes in Great Britain; and Cereals and oilseeds in the UK.

I am writing on behalf of AHDB and the comments contained here represent the combined views of BPEX, DairyCo and EBLEX (Divisions of AHDB representing pigs, dairy, beef and lamb sectors).

Thank you for the opportunity to comment on AHVLA’s proposals for the future delivery of scanning surveillance for animal related threats in England and Wales. We have responded to the consultation questions below:

1. **Do you agree with the four stated purposes for spending Government money on scanning surveillance? Please add any comments, especially if you do not agree.**

Yes, the four stated purposes are appropriate for spending government money. However there is an important fifth area where we believe AHVLA also has a responsibility.

This is to provide knowledge on the prevalence of endemic diseases as they are likely to have the biggest impact on animal health, welfare and productivity, and therefore the important government priorities of ensuring food security and sustainability.
2. Do you think that the systematic use of a wider range of surveillance data sources will improve detection of new or re-emerging threats, in light of the reduced volume of laboratory based diagnostic data from AHVLA? Please explain the reasons for your answer.

No, we are concerned that the available range of sources will not provide robust enough data for detection of new or emerging threats.

Although information is collected by other organisations, such as abattoirs, fallen stock operators, private vets and pharmaceutical companies, it is piece-meal, lacks coordination and, critically, lacks quality control. It would take a significant investment of both time and resource to ensure other data sources are providing good data.

In addition, if AHVLA does invest in interrogating these data sources for new or re-emerging diseases it would be efficient use of time to collect information on endemic diseases at the same time.

AHVLA also has historical data and this allows comparison between years and seasons which is an important aspect of surveillance. This may not be possible with the proposed data sources going forward. There may be concerns over sharing of data and confidentiality.

3. The use of additional data sources (Figure 1 and examples listed in Appendix 5) is likely to incur costs, both to collect and to analyse. Which additional four data sources, taking into account data protection issues, do you think would be of the most value to improve scanning surveillance and why?

In selecting the data sources that should be prioritised it is important that the data cover a wide range of sources, from animals that are fit for slaughter through to those that die on farm. Given these we would suggest prioritising:

- Active collection direct from private vets
- The government laboratory network
- Fallen Stock handlers (knacker yards)
- Abattoirs

4. There are many advantages of having a single veterinary team across AHVLA. Can you see any potential problems from combining the veterinary roles involved in scanning surveillance and those undertaking regulatory activities? Please explain the reasons for your answer.

It may be appropriate to combine these roles, provided both surveillance and regulatory expertise is maintained. Care also needs to be taken that the dual roles do not prevent farmers presenting cases or data for surveillance purposes (through the perception of opening themselves up to regulatory action) Some degree of specialisation also occurs within both roles and it is important to acknowledge this and that approaches and knowledge will be different.
5. Are the functions of the Species Expert Groups appropriate? What other functions, if any, should they fulfil?

Yes, the functions seem appropriate.

In addition the groups should have an outreach role, with a requirement to communicate their findings to the wider industry. This has the benefit of improved knowledge about disease and helps producers recognise how their potential contribution fits in. This should be extended to include endemic disease, providing expertise to guide elimination programmes.

6. Should there be any other (e.g. equine or small animal) Species Expert Groups formed? If so please indicate for which species, which organisations do you think should lead them and what value do you think other groups could bring?

It is not appropriate for us to comment on this question.

7. Do you think that these proposals, together with services available from non-AHVLA providers, will ensure the availability of a timely and cost effective diagnostic service of appropriate quality for farmed animals? Please provide any extra comments you may have.

No, we are concerned that the proposed changes will not deliver a service that is able to meet the stated purposes.

The reduction in the number of centres, the difficulty of getting samples to those centres, the reliance on a carcase collection scheme and the increased costs of diagnostics are all likely to reduce the number of animals that are evaluated by AHVLA, which reduces the value of the data. It is already acknowledged that the coverage is poor for sheep, so it is only likely to get worse under these proposals. AHVLA has an important role in communicating the impact of health at a farm business and industry level, and this role is currently not being performed well and would be likely to reduce further with these changes.

8. Do you agree that engagement with veterinary practitioners is a powerful method of scanning surveillance to detect new threats? What could be done to make this more effective?

Yes

Gathering data from other sources will be valuable as long as the process is well thought through and implemented. The example of NADIS suggests that the management of surveillance data from a wide range of people has challenges, e.g. how the data is sent in and different definitions between practitioners. In-field support may be beneficial to facilitate consistent data collection.
9. **Do you think that the Centres of Species Based Expertise will bring benefit to the scanning surveillance system? Please explain the reasons for your response.**

No, we are concerned that centres of species based expertise will exacerbate the problems of collecting sufficient quality data.

There is a risk of losing expertise due to the need for relocation to the selected centres. There is concern that the selection of expert centres will present particular difficulties for those species with a wide geographical coverage (eg sheep) with presentation of cases being limited by distance from the centres.

10. **The scenarios presented show three possible options for the location and type of PM examination facilities. Do you think that, combined with a carcase collection system, they would provide sufficient access to PM examination facilities? Please add any comments, especially if you have responded ‘No’.**

No

It is likely that the number of animals being submitted for PM will be significantly reduced due to difficulty in accessing the PM centres. This proposal does not tackle the reasons why producers do not submit animals – namely cost, inconvenience, and lack of definitive diagnostics in a timely manner. So by making the process more complicated and expensive, submissions will be reduced. Care needs to be taken that the carcase collection system does not duplicate the Fallen Stock scheme, and with fewer animals submitted for PM it would make the system even more difficult to run economically. It is unclear how calves and cattle (larger carcases e.g over say 25 kg) would be transported. Would there be winch systems and how would this fit with health and safety on farm.

11. **Which of the three scenarios do you think is the best? How would you further modify this scenario, or the others, to provide the best network within the available budget? Note - Scenario 1 as presented would cost more than the available budget.**

Scenario 1 - only this scenario delivers a structure that is fit for purpose.

This scenario provides good geographical distribution of centres. For example in Scenario 2, SW, NE and Yorks is poorly covered, while in Scenario 3 the SE also suffers.

Even this scenario is only acceptable if an infrastructure is in place to ensure whole animals of all species and ages can be collected.
12. **How should the transport of carcasses from collection centres to PM examination sites be organised?**  
   **If necessary please explain your thinking in this area.**

Commercial contract(s) established for collection organised by AHVLA.

The data is of value to AHVLA so they need to take some responsibility for getting the carcasses to the PM room. This will also ensure that the carcase can be handled appropriately to ensure they arrive in the best possible condition for examination (ie temperature control and timeliness are key).

13. **How should the collection service be funded?**

Shared farmers / government.

It is reasonable for the cost to be shared between the government and farmers provided the service received by farmers is deemed to be of sufficient value to their business. To achieve this service and results will need to be delivered in both a timely manner and with some guidance on their interpretation/action to be taken.

14. **Some options show a reduction in AHVLA sites and increase in other providers (Universities in the options shown, but could be others following a procurement exercise). Do you agree that other non-AHVLA providers should be used to provide PM examination capacity that can support scanning surveillance? Please explain the reasons for your response.**

Yes, the use of some additional providers could be useful to extend the network of centres.

It is important, however, that care is taken to ensure training is provided and monitoring of standards is undertaken. Information being returned to farmers should not differ between organisations. Furthermore any barriers to farmers using centres (eg commercial sensitivities or other conflicts of interest) will need to be considered when appointing third parties to undertake this role.

15. **Do you think that the proposed structure will bring effective governance and ensure the system is able to respond to changing circumstances in the future? If not, how could it be improved?**

No, with the level of detail given it is not possible to be confident that these will be met.

The sustainability of the service is vulnerable to further funding cuts in the future. If that were to result in the loss of more centres, the value of the service as a whole becomes questionable. Attention should be given to efficiency measures at the remaining centres.
16. A model for reducing public expenditure on scanning surveillance is proposed. Do you have any ideas or views on how further savings could be made or on other potential sources of funding for the system?

Organisations, such as pharmaceutical companies may see the benefit of having access to quality data, and therefore be a potential source of funding. For them to value the data, however, the number of PMs would have to be sustained at a minimum of current levels.

17. What activities or skills that are needed for scanning surveillance (see Section 4 and Appendix 4) do you think are best provided by government (via AHVLA)? Which of these are most important?

All the skills are needed in order to ensure that AHVLA has the ability to diagnose disease, and the ability to communicate the findings effectively so farmers can respond to changes in endemic disease prevalence/distribution and emerging disease threats.

18. Are there any scanning surveillance activities currently carried out by AHVLA that you think could be, or should be, provided by other organisations? If yes please provide further details.

No

The fundamental objective of AHVLA is to identify new or re-emerging diseases, but there remains a need to provide a cost-effective service to farmers on endemic disease to ensure there is sufficient throughput of samples to provide robust data.

19. Should industry or other non-Government groups share more of the cost of scanning surveillance? If so, in what ways could this be achieved?

No

It is the role of AHVLA to provide scanning surveillance and we see it as a duty of government to provide such surveillance.

20. Are there any other comments you wish to make?

The biggest issue raised by this consultation is the statement that “AHVLA veterinary staff will spend less time on the provision of a diagnostic function (both PMs and diagnostic sample submission) and more time of systemic engagement with other data providers and integration of this data to bring best value”. In effect this means that the AHVLA will no longer be providing the core role that farmers (and the public) expect. We are concerned that alternative data sources have major limitations in fulfilling the purposes set out at the start of the consultation.

There would be value in accessing data on causes of death through knacker yards.
Any enquiries relating to this submission should, in the first instance, be directed to Mr Kim Matthews at kim.matthews@eblex.ahdb.org.uk

Thank you once again for inviting our comments on these proposals. We would welcome the opportunity to be consulted on other matters related to surveillance in the future.

Yours sincerely

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