

ANNOTATED AGENDA FOR STAKEHOLDERS' CONSULTATION

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Questionnaire for stakeholders on possible approaches to a new EU Animal Health Law	
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Status of submitting entity:	An organisation
If an organisation, nature thereof:	Non-governmental organisation EU level
1. Introduction and scope	
2. Focus on prevention involving different stakeholders	
2.1 Roles and responsibilities of different actors	
2.1.1 Responsibilities and obligations of animal keepers and owners	
Do you support this preliminary approach?	Agree
Further remarks on the approach and (if appropriate) alternative proposal:	
The Community Animal Health Law sets out minimum standards for the obligations of animal keepers/owners/operators, which would be applied equally in all Member States. Such obligations should be practical, proportionate and science/risk-based and take in consideration different situations in the various MSs.	
Your estimation of likely impacts (economical, social, etc.):	
We would like to emphasise the 'proportionate and science/risk based' quality of these obligations; otherwise the smaller farms will be disproportionately burdened.	
2.1.2 Training on animal health and welfare for people dealing with animals	
Do you support this preliminary approach?	Agree
Further remarks on the approach and (if appropriate) alternative proposal:	
The animal health law should (not 'could') introduce the possibility of training animal keepers, operators and staff dealing with animals, and give incentives and tools (guidelines) to the Member States for such training, with the aim of increasing awareness of potential disease-related threats among staff dealing with animals. There is a great need for awareness of threats and diseases and of better knowledge of people dealing with animals.	

Your estimation of likely impacts (economical, social, etc.):
An EU or national fund should be established for this purpose.

2.1.3 The role of the veterinary services: clarifying the tasks and duties of official veterinarians and private veterinary practitioners

Do you support this preliminary approach? | Agree

Further remarks on the approach and (if appropriate) alternative proposal:
None

Your estimation of likely impacts (economical, social, etc.):
The animal keepers and the public must have confidence in those who are responsible for notifying the authorities and executing measures. Different standards in MSs will not be understood or supported

2.1.4 Professional qualifications and training for official and approved veterinarians

Do you support this preliminary approach? | Strongly agree

Further remarks on the approach and (if appropriate) alternative proposal:
There should be possibilities for student exchange training programmes/courses in a HIGH BIOSECURITY facility to train veterinarians and to demonstrate the actual disease in all its stages. Pictures are no substitute for sick animals in making a diagnosis and taking diagnostic samples.

Your estimation of likely impacts (economical, social, etc.):
There is much emphasis on adequate training re clinical skills/identifying disease but vet science comprises not only the science factor but also the 'art of veterinary science' i.e. the people skills, the communication skills, the handling of difficult situations, the empathy with owners. These skills are essential regarding the successful implementation of any new animal health legislation/disease control policy. Special funding must be provided for.

2.2 Increased focus on prevention

2.2.1 Biosecurity measures to prevent outbreaks on farms and not only deal with them when they occur

Do you support this preliminary approach? | Agree

Further remarks on the approach and (if appropriate) alternative proposal:
We advise a reasonable approach, where large commercial farms can profit from the incentives, while small holding would have to comply with minimum standards according to local circumstances.

Your estimation of likely impacts (economical, social, etc.):
One would need to differentiate between large commercial and small commercial holdings and small/hobby holdings.

2.2.2 Animal disease surveillance needs to be improved

Do you support this preliminary approach? | Agree

Further remarks on the approach and (if appropriate) alternative proposal:
We would like to differentiate between commercial (which produce the highest risk) and non-commercial holdings. Therefore take out '(including hobby keepers)' in the proposed approach and emphasise 'suited to their activities'.

Your estimation of likely impacts (economical, social, etc.):
It is better to spend time training owners about surveillance. Bio-security is more easily breached when people other than the owners have access. It also means that the owner takes on the responsibility. Those owners who do not rise to the challenge can be subjected to surveillance by external assessors.

2.2.3 Disease control rules and their relation to intra-Community trade

2.2.3.1 Intra-Community trade / placing on the market concept

Option 1

Do you support this preliminary approach? | Disagree

Further remarks on the approach and (if appropriate) alternative proposal:

Your estimation of likely impacts (economical, social, etc.):

Option 2:

Do you support this preliminary approach? Agree

Further remarks on the approach and (if appropriate) alternative proposal:

Option 2: The new AHL should discourage the transport of intra Community trade of animals for slaughter. (But most importantly) Instead these animals should be slaughtered at the place of origin and then exported/imported as carcasses/meat. Option 1: This option places a lot of trust in the animal keepers. In time that could be a possibility if proven that such responsibilities are justified.

Your estimation of likely impacts (economical, social, etc.):

Transport of live animals for slaughter should be limited to a minimum.

2.2.3.2 Differentiation or uniformity of trade rules and disease control measures on commercial and non-commercial farming

Do you support this preliminary approach? Agree

Further remarks on the approach and (if appropriate) alternative proposal:

The contacts and movements (usually an important factor for spreading the disease) at non-commercial farms are far less than at commercial holdings. Proportionality is vital.

Your estimation of likely impacts (economical, social, etc.):

The impact of control measures can be enormous on non-commercial farms and hobby holders, especially if one does not see the need.

2.2.3.3 Animal health requirements for trade and import for certain animal species under Directive 92/65/EC

Do you support this preliminary approach? Agree

Further remarks on the approach and (if appropriate) alternative proposal:

It is very important for all involved to understand which species are meant. F.i. that llamas are not true ruminants..... and are much less sensitive for ruminant diseases such as FMD.

Your estimation of likely impacts (economical, social, etc.):

Misunderstandings weaken the support for measures taken.

2.2.3.4 Emerging, re-emerging and exotic diseases

Do you support this preliminary approach? Agree

Further remarks on the approach and (if appropriate) alternative proposal:

It is absolutely vital that the EU employs the latest diagnostic and vaccine technologies that exist. The EU has a strong lobbying position within the OIE and can make suggestions for changes e.g. in the use of vaccines and suggest changes in international trade laws.

Your estimation of likely impacts (economical, social, etc.):

Outdated and disproportionate measures will cause a lack of support by animal keepers.

3. Simplification

3.1 Review and simplification of current rules on identification and registration of animals

Do you support this preliminary approach? Agree

Further remarks on the approach and (if appropriate) alternative proposal:

Where would specific provisions established by Comitology be found? Wouldn't it be more practical to leave all specifics with the basic principles and objectives instead of having to look for those in other legislation? ["Comitology: This is more correctly known as "committee procedure". It describes a process in which the Commission, when implementing EU law, has to consult special advisory committees made up of experts from the EU countries."]

Your estimation of likely impacts (economical, social, etc.):

None.

3.2 Specific animal health conditions relating to imports

Do you support this preliminary approach? Agree

Further remarks on the approach and (if appropriate) alternative proposal:

Demanding good testing BEFORE an animal is imported and monitor well afterwards will always be essential to prevent ((re)-emerging) animal diseases. Principles and procedures should be the same for all MSs and clear to all animal keepers, especially breeders.

Your estimation of likely impacts (economical, social, etc.):

Discrepancies between MSs and unclear requirements lead to frustration and delay when live animals are taken to another country.

3.3 Convergence of EU legislation with international standards

Do you support this preliminary approach? Agree

Further remarks on the approach and (if appropriate) alternative proposal:

Emphasis on promoting standards in the OIE. Vaccination should be in the front line of control measures instead of a last resort measure, as is still (often) the case in the OIE.

Your estimation of likely impacts (economical, social, etc.):

The public will not understand modern technology and knowledge not being used.

3.4 The definition of 'epidemiological unit' and 'holding' in EU legislation

Do you support this preliminary approach? Agree

Further remarks on the approach and (if appropriate) alternative proposal:

The Epidemiological Unit should be defined in the text of the AHL and this should be a clear and undisputable definition. It would have been better if a first suggestion had been made by the Commission. Now it is suggested by the Commission that we should define, but not what such definition should be. So what are we agreeing to?

Your estimation of likely impacts (economical, social, etc.):

Again misunderstanding and unclear definitions will lead to unrest and problems.

4. Are there any other issues that you would like to raise?

Is there any other issue that you would like to raise or that you feel that should be addressed by the Animal Health Law and that is not included in the document? Yes

Could you briefly describe the problem?

Within the EU MSs are obliged to accept products from vaccinated animals. However MSs do not oblige their retailers to accept these products as normal quality products. Therefore this EU rule becomes empty. This should be changed.

In your view, which are the possible solutions to this problem?

There is no choice. It's a combination of all these measures.

In your view, which approach would be the most appropriate to solve the problem that you raised?

Other salient points:

- the quality of scientific understanding and expertise often poor
- scientific input become overthrown by trade issues too often
- animals are regarded as livestock units rather than sentient mammals with complex social hierarchies - this must change
- that, above all else, we must move away from killing the host as a means of managing the disease
- that we recognise that the psychosocial impact on livestock owners can be so extreme that alternative policies that are more ethically based and more welfare friendly must be adopted
- that concern for the environment should direct policies away from slaughter and disposal.