

Outline of an animal health and welfare strategy for Great Britain

NOAH response

Background

The National Office of Animal Health (NOAH) represents the UK animal medicines industry whose aim is to provide safe, effective, quality medicines for the treatment and welfare of all animals.

Summary

NOAH fully supports the aim of the outline strategy, to improve the health and welfare of animals kept by man, and to protect public health from animal disease.

We believe it is important that not only farm animals are addressed in the full strategy - the health and welfare of the nation's horse and companion animal population are important too. We understand these areas will be more fully addressed in the spring and look forward to the opportunity to comment then.

As NOAH said in its comments on the 'Preparing an animal health and welfare strategy' document: good preventive medicine, when needed, to stop animals from getting sick - and therapeutic medicines being available to treat animals, are fundamental to any animal health and welfare strategy. The marketing authorisation system for animal medicines protects not only the public, but also the animal. However, regulation should not be unnecessarily restrictive so as to prevent new medicines from reaching the market that would have otherwise been beneficial to animal welfare or existing medicines from being forced off the market because it becomes unviable to retain them. Likewise, while their use should be controlled, they should also be accessible.

Animal medicines are a critical part of the solution for a sustainable animal health and welfare policy. Sick farm animals are not efficient, and feed inputs are wasted. Sick companion animals cannot do their job, whether that be as trusted friend or as assistance dog. We are pleased to see responsible use of veterinary medicines as part of the strategy.

The role of an innovative animal medicines industry is essential for improving animal health but the nature of disease is dynamic and, unless there is a responsive industry addressing new disease challenges, overall health status will decline.

We repeat that there is much scientific expertise within the animal medicine industry. The people involved with researching the medicines of the future are there, along with those that know how existing medicines can be most effectively used in particular situations to help prevent and cure disease. We would welcome the opportunity to contribute to the Strategy Steering Board, the scientific committee and sectoral groups, so this expertise can be harnessed. We also suggest in the detail of our comment other groups such as AMTRA (Animal Medicines Training Regulatory Authority), RUMA (Responsible Use of Medicines in Agriculture) Alliance and FACE (Farming and Countryside Education) who can also play an important part in the development and implementation of the strategy.

Animal health and animal welfare are inextricably linked: and healthy food comes from healthy animals.

Specific comments

Section 2 Vision

NOAH agrees with the vision set out.

We would like to add, in relation to the good communication section in paragraph 5 of this section, that there are others that could usefully be involved in these networks. There are other advisors, such as the AMTRA SQP employed by each animal health distributor.

There is also expertise at animal medicines companies, which will be explored in more detail later in this comment.

Section 3 Key players

3.3 Veterinarians.

The strategy makes mention of the important role of veterinarians in private practice and those employed by the Government. We agree they are key to this strategy, but do express concern that, as large animal veterinarians are faced with a potential loss of income from medicine dispensing, more and more work could fall onto the state veterinary service. It seems that DEFRA does not have the funding to support this.

However, there is another group of veterinarians, those employed by animal medicines companies, who can also make a valuable contribution. They are the closest to the research, development and production of animal medicines - including vaccines used to prevent and treat disease. They receive feedback on disease prevalence. They know the possibilities and pitfalls associated with medicines and vaccines for disease prevention and treatment. They can make a useful contribution.

Animal medicine companies are mentioned in the next section, but the veterinary surgeon expertise within those companies should not be overlooked.

3.4 Livestock and food chain related businesses

Here animal medicine (veterinary pharmaceutical) companies are mentioned, and NOAH and the industry accepts its responsibility and is pleased to help.

One group not specifically mentioned is AMTRA. Through the registered Suitably Qualified Persons in the agricultural merchant sector, AMTRA is in a strong position to work with the Government to assist in the communication of an animal health policy that protects food safety.

Section 4 Where are we now?

4.1 Defining a baseline

We welcome the inclusion of a definition of a baseline, so the effect of the plan can be measured.

4.2 Key challenges

We would add to the comments relating to veterinary medicines that, as well as the implementation of the Government response to the Marsh Report and Competition Commission report, the impact of the EU Veterinary Regulatory Review also could represent a challenge - or an opportunity.

Section 5 Food safety

5.2 Partnership

The Strategy Steering Board - we welcome the setting up of an interim steering board and are pleased to see stakeholder involvement.. Annex B details the proposed membership of this Board and we are pleased to see a spread of stakeholder representation proposed - including the veterinary profession.

But we feel that there would also be value in involving those with direct knowledge of animal medicines here. This could be NOAH. Or AMTRA, which has a broad membership and is an ideal partner with the veterinary profession to communicate messages to the farmer - and indeed, pet and horse owner. See section 5.3 on best practice for more detail on AMTRA's role and why we feel its candidature for membership of the Strategy Steering Group should not be overlooked.

Obviously, we feel that, because of the inherent importance of good preventive medicine as part of the overall strategy for animal health and welfare, NOAH would like to be involved in the sectoral sub-groups. Our members make medicines for all the species, so would be happy to be involved across the board.

For the farm species, then RUMA (Responsible Use of Medicines in Agriculture) Alliance, with its cross sectoral relevance, would also be a potential contributor, and could, through its wide membership, logically form the greatest part of a sectoral group on medicines and training.

The role and composition of the advisory Science Group is not specified in the draft strategy. However, it is the confident aspiration of NOAH that the wealth of scientific expertise within the animal medicines industry will not be disregarded. The depth of knowledge held in the

animal health research and development divisions is a resource which should be made available to the government, and which government should be seeking to acquire.

5.3 Best practice

We fully support the basing of best practice on sound science.

Again, relating specifically to medicines, another source of guidance on best practice is the guidelines published by RUMA.

Within the current European Regulatory Review of Veterinary Medicines, proposals have been made for the banning of advertising of POM animal medicines to the general public. If this is implemented it is important that the farmer is classified as a 'business user' in the food production industry, in order for them to be kept informed of advances in animal medicines and their uses - especially advances in disease prevention.

There are over 100,000 farms and less than 1,000 veterinary practices involved in large animal practice - the recent report by the Select Committee for Environment, Food and Rural Affairs recognised this was a concern. This amplifies the need for this more direct information route to continue, to facilitate best practice.

AMTRA SQPs have studied to obtain the qualification which enables them to dispense the unique group of pharmacy and merchants' list medicines which the government is currently fighting at European level, in discussions on the Veterinary Regulatory Review, to maintain. These people, in addition to veterinary surgeons, actually deal with medicines supply on a day-to-day basis and are, de facto, another vital interface between preventive medicine and the owner of the animal. Their daily contact with the farming community makes them the ideal source of information on biosecurity "on the ground" and they are an integral element of the country's future animal health and welfare. AMTRA therefore has a key role to play in the setting and implementation of the AHWS.

5.4 Farm health and welfare planning

We fully support the strategic outcome that prevention is better than cure, which is totally compatible with the long-standing NOAH quote that 'healthy food comes from healthy animals' and look forward to working with other stakeholders in this area.

Good preventive medicine is a fundamental part of any health plan.

5.5 Investing in the future

The skills of AMTRA SQPs, and the training schemes developed for the different AMTRA registered should not be forgotten in the context of consolidation of existing knowledge and the dissemination of best practice advice. RUMA also, as described earlier, produces useful information.

Relating to consumers, in particular to the education of children, the organisation FACE (Farming and Countryside Education) would seem an appropriate existing grouping to inform children about the countryside.

5.6 Responsible use of veterinary medicines

We fully support the final paragraph of this section: *'It is right to expect that animal keepers will have access to the products that are needed to treat disease when it affects their animals. It is also right to expect the responsible use of those medicines in sustainable livestock systems.'* However we would add that it is also as important that animal keepers have access to products needed to *prevent* disease, as it leads to better welfare, and more sustainable production, to stop animals from getting sick in the first place. This concept needs to be built into this section to reinforce the role of good preventive medicine as part of the strategy (eg vaccination programmes).

The marketing authorisation system for animal medicines protects not only the consumer, but also the treated animal, the environment and the user of the product. However, regulation should not be unnecessarily restrictive so as to prevent new medicines from reaching the market that would have otherwise been beneficial to animal welfare or existing medicines from being forced off the market because it becomes unviable to retain them. Likewise, while their use should be controlled, they should also be accessible.

NOAH looks further to working with others on issues relating to animal medicines.

6 Measuring success

6.4 Measuring change

Following our comments on the importance of preventive medicine as part of the health and welfare strategy, it is pleasing to see ‘Proportion of Government money spent on prevention rather than cure’ and ‘Take up of disease prevention and control measures, veterinary medicines and disinfectants’ as indicators for success.

NOAH would suggest that this needs to be made clearer within the body of the strategy.

And of course, one absolute measure of success would be if we were now ready to prevent something like the disaster of FMD in 2000 from happening again. The devastation this caused, and the potential for long term damage to UK British livestock production were this to happen again, must not be forgotten. How much extra control is now in place?

Conclusion

Finally, we acknowledge that this document set out, in the main, to address issues related to farm animals, and understand that the health and welfare of companion animals will be more fully addressed in the full strategy document. We would stress once more that this does need to be done and not forgotten. Not only does this latter group of animals deserve good health and welfare, there are also a few zoonotic diseases which require education and appropriate disease prevention and treatment if an overall health and welfare strategy for Britain’s animals is to be achieved.

This strategy is a “giant step forward” for our animal population. We now all need to work together to ensure the vision is realised to the benefit of all animals and animal owners, now and in the future.

30 October 2003

National Office of Animal Health

3 Crossfield Chambers

Gladbeck Way

Enfield EN2 7HF

020 8367 3131