

## Consultation on Defra's Contingency Plan for Exotic Notifiable Diseases of Animals

1. The following response is made on behalf of the Royal College of Veterinary Surgeons (RCVS). The RCVS is the regulatory body for veterinary surgeons in the UK. The role of the RCVS is to safeguard the health and welfare of animals committed to veterinary care through the regulation of the education, and ethical and clinical standards, of veterinary surgeons and nurses, thereby protecting the interests of those dependent on animals, and assuring public health. It also acts as an impartial source of informed opinion on relevant veterinary matters.
2. The RCVS strongly supports the development of contingency plans to deal with the outbreak of exotic notifiable diseases. The outbreak of exotic diseases presents a real and significant threat to the health and welfare of animals, public health and the economy in the UK. As Defra notes, over the last 10 years there have been over 14 outbreaks of exotic disease each incurring costs of between £2 million and £3 billion. Indeed, the wider costs attributable to these disease outbreaks are considerable higher and in some cases these costs continue to rise. It is imperative, therefore, that detailed operation plans are developed and communicated to ensure that Defra and its associated bodies can respond rapidly and in an organised and coordinated fashion so as to minimise the adverse impacts when the outbreak of an exotic disease occurs.
3. Publishing such plans and consulting when they are reviewed is also important, and plays a key role in reassuring the public and relevant stakeholders that appropriate measures and operational procedures are in place to deal with the outbreak of disease and to protect animal and public health. The College notes, however, that the Contingency Plan is a high level document and that the effectiveness of the UK's response to exotic diseases could potentially be improved through the development of Field Manuals that would provide information on the practical aspects of responding to a disease outbreak at ground level.
4. The RCVS also commends the annual review of such plans and their regular practical testing in exercises such as 'Silver-Birch'. Such review and testing serves to ensure that any response to the outbreak of an exotic notifiable disease is practicable, fit for purpose, based on the most up-to-date science, and is appropriate and proportionate to the potential risks of the disease. Exercises of this type may also serve to highlight problems that should be resolved before the next outbreak of an exotic notifiable disease occurs.
5. The RCVS is broadly supportive of Defra's contingency plan for exotic notifiable diseases and the preparedness arrangements, operational structures and decision procedures it contains. The College also commends the new presentation of the plan as a simplified single document.
6. As a regulatory body, however, the RCVS does not seek to comment on all of the details and operational procedures in the plan, rather it will limit its comments to those areas where there are clear indications of relevance to the College's role and where Defra, the veterinary profession or the public are likely to seek assistance from the College. In this response the RCVS will therefore

focus its attention on the Foot & Mouth Disease (FMD) Emergency Vaccination Plan and the use of lay vaccinators that this entails.

7. The RCVS is supportive of the use of trained lay persons, supervised and directed by veterinary surgeons as a means of meeting the logistically difficult task of rapidly applying an adequate vaccination zone around an FMD outbreak. Indeed, in this regard the College notes the recommendation made in the 2002 Royal Society policy document entitled 'Infectious diseases in livestock', that Defra should 'contract with private practitioners to be available to train and supervise suitable lay persons to perform emergency vaccination, under veterinary supervision or direction'.
8. Whilst the RCVS supports the use of lay vaccinators as a part of an emergency FMD vaccination programme, it is essential that such lay vaccinators are adequately trained and are working under appropriate levels of veterinary direction and supervision. To this end, the RCVS considers that it is important that the Standard Operating Procedures (SOPs), which set roles and responsibilities of those involved in implementing an emergency vaccination programme, and the training programme provided to lay vaccinators, should be reviewed frequently in conjunction with the veterinary profession and other relevant stakeholders.
9. The current arrangements for emergency vaccination against FMD, and potentially other exotic diseases, rely on a Defra-appointed vaccination contractor who is responsible for implementing the vaccination programme. The RCVS, however, considers that in relation to the control of FMD and other notifiable disease outbreaks, practising veterinary surgeons must not be forgotten and have an important role to play. Not only are such veterinary surgeons vital in terms of monitoring and reporting outbreaks of such diseases, their knowledge of their local area, its farmers, farms and the animals on those farms should form an important part of any emergency programme in the event of an outbreak. The RCVS would therefore urge Defra to develop plans for regular engagement and communication with practising veterinary surgeons, that will serve to ensure that veterinary surgeons are aware of contingency plans and operational procedures that will come into action in the event of the outbreak of an exotic disease.
10. The Royal Society policy document notes that during emergency FMD vaccination 'delivery of potent vaccines to a high proportion of the livestock must occur within a short period' and the Society recommended that Defra should explore 'ways of ensuring that at least 100,000 doses of the ...vaccine would be available within two days of the confirmation of an outbreak'. Furthermore, the Society considers that using the 'private practitioners assisted by lay vaccinators' model 'with farmers' assistance and compliance' it would be possible to vaccinate at least 90% of the cattle or all the cattle on the larger farms within six days in an area of any size'. In order to improve the effectiveness of an emergency vaccination programme, the RCVS questions therefore whether it might be possible to reduce the time required for the current contractor to be operationally ready to implement vaccination programme from its current level of five days.
11. Given recent evidence of fraud relating to cattle that are found to be TB test-positive and the Government's moves to tackle this by requiring that DNA tags are applied immediately to cattle that test positive for TB, the RCVS considers that provisions should be considered that could help to prevent similar fraud occurring in relation to cattle within an FMD vaccination zone.

12. The College notes its support for the International Animal Health Emergency Reserve (IAHER) agreement, which allows veterinary surgeons and technical staff to be brought into the UK from signatory countries in the event of the outbreak of a disease. The College maintains, however, that it is necessary to ensure that the arrangements for bringing veterinary surgeons and technical staff into the UK, in the case of an outbreak, are robust enough to ensure that such persons are working within their competencies. Furthermore, the RCVS considers that intensive training should be available to incoming veterinary surgeons and technical staff and that all those working in the field should be provided with clear and succinct briefing materials in the form of a Field Manual. Where those veterinary surgeons and technical staff brought into the UK have a particular expertise or skill, there should be procedures to ensure that the tasks they are given, where possible, utilise such expertise.
13. The RCVS offers its assistance to Defra through procedures to accelerate the emergency registration of veterinary surgeons that are brought into the UK, under the terms of the agreement, to deal with such an outbreak.
14. The devolved nature of the exotic disease contingency planning has the potential to affect adversely the effectiveness of any policy to tackle the disease. Steps must therefore be taken to make sure a coordinated approach is taken within the Devolved Administration structure and to ensure that the UK's obligations to the European Commission and the Office International des Epizooties are met.
15. The RCVS commends this year's proposal to produce an additional overview plan that will reflect the policy and details of exotic disease response plans of the four countries in the UK and believes it will provide an important overview of the control and management of exotic disease outbreaks at a UK level.
16. If you require any clarification on the above comments, please do not hesitate to contact me. Alternatively, representatives from the RCVS would be happy to meet with you to discuss and expand upon our position

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