

Position of the Netherlands on European Animal Health Policy Strategy



Introduction

The Netherlands welcomes the European Commission's initiative to develop a coherent animal health policy, and its approach involving extensive external evaluation.

As an interested party, the Netherlands recommends that a number of key points are given prominence in the elaboration of future European animal health policy:

- Prevention
- Vaccination
- Control
- Payment of costs
- Monitoring and data management
- Differentiation in animal health policy

We also consider that animal welfare merits a more prominent position in the discussion concerning animal health.

Prevention

In the Dutch view prevention is an important instrument in combating animal diseases. The Netherlands endorses the recommendations contained in the CAHP evaluation concerning the development a prevention strategy based on risk analyses and greater use of biosecurity measures.

Risk-aware primary producers

Preventive measures at farm level are primarily the responsibility of the sector itself. The Netherlands believes that we need to find ways of promoting risk awareness in relation to hygiene on the farm.

Restriction of international animal contacts

The high number of international animal contacts is a significant risk to animal health – particularly transports of live (slaughter) animals and to a lesser degree animal products. These transports can spread infections over great distances. The Netherlands therefore also endorses the recommendation in the CAHP Evaluation to reduce risks by reducing the numbers of long-distance transports of live animals.

Biological globalisation

Time and again there are outbreaks of animal diseases in Europe which originate from elsewhere in the world, sometimes from a great distance away. There are various possible reasons for this, including the increase in free trade resulting in the growth in worldwide trade in animals and products, human mobility (tourists and other travellers) and illegal transports of animals and animal products. Also there is increasing pressure on the livestock herd in the Union, for example from what the FAO calls the "Livestock Street", from Central Asia via the Middle East and Turkey. Climatological changes might also affect the worldwide spread of disease, which will mean ever more outbreaks of diseases which may be new to Europe.

In addition to preparing the EU for diseases by building up expertise, reinforcing early warning systems, increasing awareness among travellers and in the travel industry, better controls at EU external borders and at airports, another effective instrument is a pro-active approach to improving the control of exotic diseases at source. The Netherlands supports the recommendation from the evaluation to do more to tackle the problem at the source. Since 2005 the Netherlands has been involved in using knowledge to develop and implement a strategy and veterinary organisation for the prevention and control of avian influenza in Asia. The Netherlands also provides experts (the "Fire Brigade") who can be sent out at short notice to countries where there are outbreaks or potential risks of animal diseases.

Ability to track animal movements

The Netherlands takes the view that a good and harmonised European identification and registration system must be strongly promoted. This can only happen if EU Member States design their national systems to facilitate the free exchange of information. Implementation of electronic identification for sheep and goats is an important matter. The European Commission has to provide the necessary direction. This is the basis for an effective animal disease prevention and control, as well as for certification and guarantees. This would have the additional advantage of reducing the administrative burden on farms and businesses, as certificates would be valid for both national and community trade.

The Netherlands is also strongly in favour of further development of the TRACES system in which all animal movements, and specifically cross-border movements, are recorded centrally in a single European system, as is currently done at national level for many animal species.

Vaccination

The Netherlands considers that vaccination merits far greater prominence as an instrument for the prevention and control of animal diseases. This applies particularly in the case of diseases presenting a continuing threat, such as avian influenza. In the European context we need to find the most effective strategies and use targeted information and research among other means to minimise disruption of trade and markets. The Netherlands requests that the European Commission makes the subject of vaccination in relation to trade a key point of policy, and that its elaboration should be incorporated into European policy. It is essential that policy is developed with regard to a common communication and information strategy aimed at consumers and producers. In principle there should be no continuing or permanent preventive vaccination of animals where there is no real danger of infection. Bio-security measures at farm, chain, national and European level continue to be of crucial importance.

Disease control measures

Effective animal disease control, certainly of highly infectious animal diseases, is only possible if the responsible authority has a well-organised crisis management system. Member States are themselves responsible for control and therefore also for good crisis management. However, it is also desirable that the EU has a clear role in setting binding requirements for the drawing up of contingency plans and also in supporting European countries with weaker veterinary services in their crisis management.

Animal disease control is a dynamic process. Although we have now amassed much experience in animal disease control within Europe, new aspects continue to emerge. For example an outbreak with a new type of virus which is much more virulent than anticipated, or conversely less virulent, so that there are fewer obvious clinical symptoms than usual, or where species prove more vulnerable to a particular disease than expected. The Netherlands considers that a dynamic approach is required with a package of measures before, during and after outbreaks. In this context it is important to learn lessons from the past and from (epidemiological) research, but also to maintain an open mind with regard to the most recent experience in the field. We must also take into account the proportionality of the control regime to the disease concerned.

The Netherlands is of the opinion that animal disease control should not be based solely on epidemiological considerations, but should also take account of economic and societal/ethical factors. The Netherlands no longer regards the mass culling of healthy animals to combat disease as acceptable and argues that vaccination must be a real option in certain situations. Products of vaccinated animals are safe and it must be possible to sell them on international markets, both within the EU and beyond. The entire food chain, from farmer to trader, processor, supermarket and consumer, is responsible for these sales. Individuals must not become victim of emergency vaccination which causes them to lose their sales market. The Government, which decides whether or not there should be emergency vaccination, must therefore play a facilitating role, to minimise the adverse effects of vaccination on trade. The Netherlands endorses the recommendations from the evaluation that risk analyses and cost-benefit analyses must be used to determine the best control strategy, but notes that practical experience should also be taken into account. Special attention must also be paid to the animal welfare aspects.

Payment of costs

There are considerable discrepancies between Member States when it comes to the final division of the payments of the costs for monitoring and control of animal diseases. The evaluation report demonstrates also that the existing systems in the various countries are primarily geared to compensation for the direct losses, do little or nothing to encourage prevention, show inequalities in the financial involvement of government and that national and EU authorities run considerable financial risks. These discrepancies lead in practice to market distortions.

To reduce the differences in the payment of costs of animal disease control and payments granted within EU, the evaluation report proposes a harmonised system for the payment of costs (Harmonised Cost-sharing Schemes for Epidemic Livestock Diseases, HCSS). The Netherlands supports this recommendation, as it is the only option to reduce the discrepancies between the different Member States.

We see government involvement in such a system of payments as a sliding scale: the greater the external effects on monitoring and control, the greater the justification for government involvement (direct and financial). The fact that the external effects of the various diseases are not all equal leads us to categorise animal diseases in more or less homogenous groups, so that the role and involvement of government can be determined on the sliding scale for each group. Several Harmonised Cost-sharing Schemes with and without government involvement are thus conceivable at the extremes of the scale.

The costs associated with monitoring and control of animal diseases making by the government or businesses for assistance at instruct of the government, fall largely into two categories: costs for monitoring and control, and the cost of payments to individual farmers to compensate the loss of culled animals and materials as a result of government imposed control measures. The Dutch principle is that the farmers and others who create income by animals, themselves must make a substantial contribution to the costs incurred by government for the monitoring and control of animal diseases. Other (consequential) costs or losses suffered as a result of government control measures are in principle a risk for themselves, to what insurancy can be a solution. After all, such consequential losses are a normal operational risk. The Netherlands considers that this principle is important in achieving harmonisation.

To improve prevention, the researchers have cited the preventive effect of the Dutch system (animals which are dead on first examination attract no compensation; if they are visibly sick they attract only 50% compensation). However the evaluation report subsequently proposes linking compensation to the level of infection. Given the arbitrary nature of the level of infection to be determined, the extra work, for which there is insufficient capacity in the event of an outbreak, and the many objections that will undoubtedly be lodged, this is an impracticable and undesirable proposal.

We recognise that certain behaviour on the part of livestock farmers or other links in the chain (such as failure to comply with control measures or unwillingness to notify authorities) can lead to veterinary risks. The Netherlands considers that this behaviour must be prevented as far as possible and notifying by the farmers must be stimulated. But the question remains for the Netherlands as to whether this should be achieved by means of financial instruments (such as compensating for damage suffered by farmers during the period for examination after the notify) or by other means. The Netherlands is reticent to use financial instruments, specifically because the effect cannot always be clearly predicted. If financial instruments are used they will in any case have to be primarily funded by the sector.

The evaluation report also proposes compensating for losses in value as a result of emergency or other vaccination as part of the control regime. The Netherlands does not share this view, as vaccinated animals or their products do not differ essentially from unvaccinated animals and their products.

Finally the evaluation poses the question of whether the Harmonised Cost-sharing Scheme for livestock farmers should be extended to other links in the chain, such as abattoirs. The Netherlands considers the inclusion of other players an undesirable development, since these players want to see other types of loss compensated through the HCSS, which would considerably increase its complexity and scope, making the system increasingly impracticable. It is more effective to have a separate Harmonised Cost-sharing Scheme for such players.

Monitoring and data management

The Netherlands takes the view that good information provision on developments relevant to animal disease in the sectors concerned is an important resource in policy

and implementation. Monitoring and data management are important in relation to the surveillance of known and 'emerging' diseases. Hygiene regulations provide ample scope for data collection.

The Netherlands believes that this method can generate a broad range of information on farms and businesses, and also on national and intracommunity sectors, which can be used for early identification of problems and early warning systems.

With regard to the use of the data by the inspection services, current legislation is still aimed largely at food safety in the strictest sense. This would have to be extended to animal health. The Netherlands emphasises here that many animal diseases do not pose a threat to food quality, and that careful communication on this matter is crucial.

Differentiation of animal health policy for different farm types and groups of animals

The evaluation pays too little attention to a number of social developments which can affect animal health policy. The Netherlands considers that these factors must play a role in the further elaboration of the new Community Animal Health Policy.

The Netherlands requests that attention be given to the position of those who keep animals as a hobby, animal husbandry in which outside runs are compulsory, and the consequences of the establishment of the Natura 2000 network.

There is a significant new development in relation to non-commercial animal husbandry, in that increasing prosperity and depopulation of rural areas have led to more and more people taking over (former) agricultural premises, so that in a number of European countries there is an increase in the number of animals kept on a non-commercial (hobby) basis, and in semi-commercial smallholdings. The social outcry against the culling of non-commercial animals has made it clear that there are considerably more animals kept as a hobby than was initially thought. This put this category of animals on the political agenda. Keeping animals on this basis is not primarily intended for food production, but is more for the pleasure people have in owning and tending the animals. This also means, among other things, that the relationship people have with their animals is completely different from that of commercial livestock farmers with their animals. Sometimes non-commercial keepers see the laws and rules governing animal disease control as over-regulation. Thus there is little acceptance or support among this group for animal disease control measures.

With regard to wild animals the creation of the Natura 2000 network (EU Birds and Habitats Directives) is significant. In many cases this will bring nature management and agriculture closer together.

The Netherlands thus argues that more differentiation is needed in the approach to animal health and argues for a differentiated and risk-based approach to disease control. The OIE concept of 'compartmentalisation' needs to be further elaborated in practice and then experimentally tested for tenability. This would enable us to move from a generic control regime to differentiated tailored solutions taking account of the special position of non-commercial and wild animals.

Colofon

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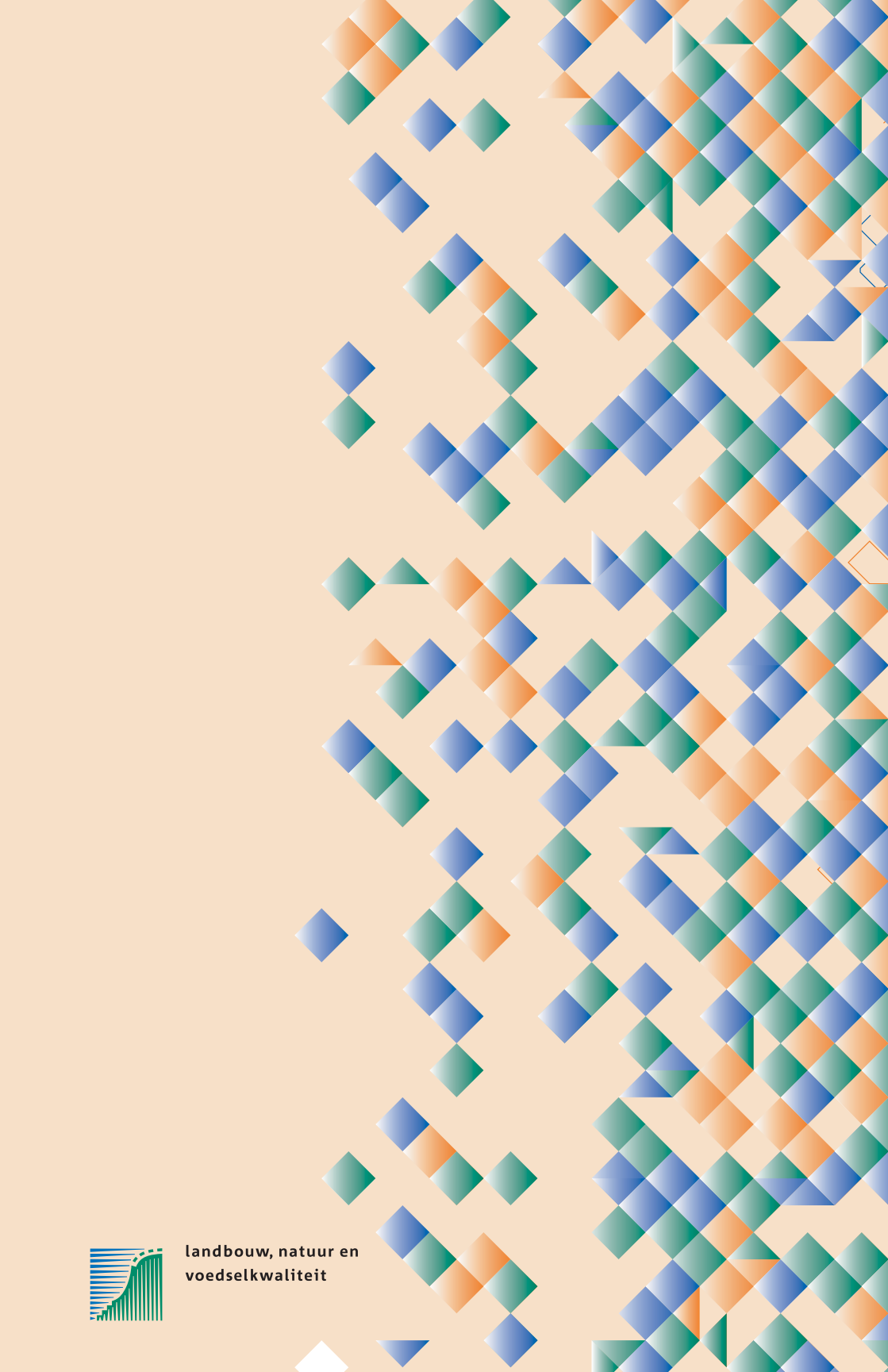
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