

Competent Authority comments on the draft report received 14 December 2017

**RESPONSE TO DRAFT FVO MISSION REPORT DG (SANTE) 2016-8767 - MR  
(Ref. Ares(2016)6421924) - 15/11/2016**

**2. Objectives and Scope (Page 3)**

Amendment:

Table of meetings:

“The Royal Society for the Prevention of Cruelty to Animals”

**4. Background (Page 4)**

“The UK is 73% self-sufficient. 50% of total milk production is sold as fresh milk (semi-skimmed)”  
For clarification, semi-skimmed milk is an example and is not the only form of milk sold.

**5. Findings and Conclusions / 5.1 Main actors involved with the welfare of dairy cattle  
Paragraph 3 (Page 5)**

‘Cattle Health and Welfare Group (CHAWG) primarily represents farmers ....., and private veterinarians (the BCVA)’.

For clarification, the BCVA is a subset of private veterinarians. BCVA represents its members and not all private vets as might be assumed from this statement.

Amendment:

“Cattle Health and Welfare Group (CHAWG) is an independent group made up of key industry organisations and farming representative bodies who have an interest or responsibility for cattle health and welfare. Key organisations include the CAs, AHDB, NFU, non-governmental organisations.....”

**Paragraph 5 (Page 6)**

Amendment:

“The AHDB is a levy funded not-for-profit organisation”.

**Bulletpoint 1:**

Amendment:

~~90% of which are members.~~

For clarification, AHDB is funded through a compulsory levy, it is not a membership organisation so the levy payers are not referred to as members.

**Bulletpoint 7:**

Amendment:

“the Profitable Lifetime Index (£PLI), that was last revised in 2014 to reduce the weighting of milk production traits from 45.2% to 32.2 % .....”

**Bulletpoint 10:**

Amendment:

“The Mastitis Control Plan is a structured and bespoke plan for farmers to tackle mastitis on their farm with a focus on prevention. It facilitates a 2 day training of veterinarians and consultants as mastitis control plan deliverers. The BVCA’s Advance Practitioner Course on Bovine Mastitis counts towards 1 day of training for delivery of the AHDB Dairy Mastitis Control Plan. ~~One of the targets of this plan is a~~

~~herd average SCC below 150,000 cells/ml. The plan aims to reduce cows affected with clinical mastitis by 22%.~~

### **Paragraph 5 continued (Page 7)**

#### **Bulletpoint 1:**

##### Amendment:

“.....The target of this initiative is for farmers to double the birth weight of ~~selected~~ calves by ~~the time of~~ weaning, to reach 50% of the mature body weight at 10 months, 55-60% by first service and 90% by first service calving.

### **Paragraph 6 (Page 7)**

For clarification, AssureWel is a Bristol University, RSPCA and Soil Association initiative.

### **Findings / Paragraph 10 (Page 8)**

#### **Bulletpoint 2:**

##### Amendment

“Or ad-hoc:

in reaction to notifications arising from other official controls, such as slaughterhouse or market checks, indicating possible animal welfare problems at farm.”

### **Paragraph 11 (Page 8)**

“.....will be subjected to official animal welfare checks only if they are the object of a complaint or of a slaughterhouse or market notification.”

For clarification, markets are used by the majority of farmers and are an important on-farm indicator. Markets are attended routinely by the Local Authorities and on a risk base or in response to complaints by APHA.

### **Paragraph 13 (Page 9)**

##### Amendment

‘Within the annual 1% of farms selected for official checks, 20% are randomly chosen and 80% are selected according to APHAs' risk assessment system. This risk assessment system is currently being reviewed ~~for improvement~~ but nevertheless it already includes the relevant points required by Article 3 of Regulation (EC) No 882/2004.’

### **Paragraph 16 (Page 9)**

##### Amendment

#### **Bulletpoint 1:**

‘For cross-compliance checks the advance information collected would vary between inspectors but mostly it would focus on the previous compliance history of that farm, and the total area used by the farmer (~~stables~~ sheds, adjoining pasture and other nearby pastures or facilities used by the farmer)’.

### **5.3 Indicators of animal welfare / Findings / Paragraph 20 / Table 1 (Page 11)**

##### Amendment

#### **Identified TRENDS**

~~AHDB's SCC target is less than 150,000 mainly due to retailer requirements, but different production types in the UK. The national average has been steadily decreasing since 2008 (162,000 in 2015).~~

“ There has been a steady decrease in SCC with 2015 average being 162,000/ml, 5,000/ml below the 2014 average of 167,000/ml. Since 2008, there has been a steady increase in the percentage of milk recorded that have a SCC below 200,000 cells/ml milk (73.8% in 2008 and 79.7% in 2015).”

## **Paragraph 21 (Page 12)**

### Amendment

~~“.....The AHDB’s target is to reach a SCC national average of less than 150,000 mainly due to retailer requirements.....”~~

## **ANNEX 2 - PRUDENT USE OF ANTIMICROBIALS**

### Amendment

#### **Bulletpoint 4:**

“The 3Qs (Quantity, Quality and Quickly) is a concept ~~developed~~ promoted by AHDB and other industry bodies.”

Further comment: A reference and link to the Responsible Use of Medicines in Agriculture Alliance (RUMA) would be useful: <http://www.ruma.org.uk> and the inclusion of a signpost to ‘Farm Antibiotics’: <http://www.farmantibiotics.org/>.

#### **Bulletpoint 6:**

“ The Veterinary Medicines Directorate indicated that in the UK there are no anti-microbials authorised to be used in milk-replacers.”

For clarification, this statement refers to incorporation into milk replacers in advance (for example by the manufacturer). There are a small number of products authorised which, following a clinical assessment by the vet, can be added on the farm to milk replacer immediately prior to feeding calves.