A Proposed Strategy for Enhancing Veterinary Surveillance in the UK.

Response to DEFRA consultation from English Nature.

1. English Nature supports the proposals to review and strengthen the veterinary surveillance system. English Nature is likely to be a user of such a system, and recent events have underlined the need for a coordinated and comprehensive approach to surveillance, and associated risk assessments for environmental as well as human/livestock health risks. Of particular concern to English Nature is the need for sound information on the consequences of livestock diseases and disease spread, for control measures which may affect wildlife in general and SSSIs in particular. This would include action affecting the movement and location of livestock for grazing SSSIs, control measures to restrict spread of zoonoses such as rabies, bovine tuberculosis and WNV, and measures such as livestock incineration and site disinfection which again may result in pollution affecting SSSIs. We therefore welcome the scope of the strategy to include wildlife populations and associated environmental factors as indicated in Section 3.2; this should stress the need to take due regard of the needs of habitats and species protected in statutorily protected sites. Information held (eg in GIS) on SSSIs is likely to be a valuable part of the data integration programme proposed for veterinary surveillance (Section 6) in assessing risks to SSSIs, and English Nature is willing to assist in making this available through the proposed strategy.

2. We welcome the recognition in the strategy of the need to clarify the roles and strengthen the links between Government departments, Agencies and other organisations with statutory responsibilities, in tackling developing zoonoses or other animal disease issues. For example a number of bodies have been involved in developing contingency plans for WNV, which has wildlife implications both directly as a disease of wildlife, and indirectly through the control measures (such as widespread pesticide use) that may be necessary. This has involved discussion between bodies such as HSE, Pesticides Safety Directorate, English Nature, DEFRA and the Department of Health, with differing priorities and responsibilities. An institutional mechanism to coordinate such interests is necessary to ensure that comprehensive cost (including environmental cost) -benefit appraisals are carried out of the options available to deal with such an epidemic as part of the risk assessment process.

3. We would like to repeat the point made in earlier consultations concerning veterinary medicines surveillance (eg March 2002 VPC consultation on the Suspected Adverse Reactions Surveillance Scheme (SARSS)) that, when compared with the information collected on usage and impacts of pesticides, information on veterinary products is less consistently and systematically collected, and is much less readily available to potential interested parties. The Pesticides in the Environment Working Group (PEWG) in their recent report (Pepper and Carter 2000) recommended that the Veterinary Medicines Directorate (VMD) should make available data on the sales of veterinary products and information on where and when such products are used. PEWG also recommended that VMD should provide data on the environmental impact of veterinary products, including on their fate and behaviour and distribution.
in the environment. Such information is essential to enable assessment of risks and changes in risks post registration, and would provide a valuable source of information on aspects of risk of disease control measures for the proposed veterinary surveillance system. The opportunity should be taken during this review to consider the need to strengthen information collected which is relevant to understanding the environmental risks of veterinary medicines.

Reference:

5th March 2003