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Llywodraeth Cymru
Welsh Government

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Summary of Responses to the Consultation on the Introduction of Quarantine Units

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Executive Summary

- The proposals presented in the consultation are for a general standstill exemption, applying to cattle, sheep and goats, for holdings using Quarantine Units (QUs).
- Respondents were asked to consider four specific questions:
 1. To what extent do you agree with the benefit of implementing Quarantine Units (QU) to replace the current 6-Day Standstill Rule exemptions?
 2. The Proposed Changes - What are your thoughts relating to the proposed QU process?
 3. Nature and number of QUs per farm premises - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.
 4. Changes to the Disease Control (Wales) Order 2003 - your views are being sought as to whether you agree or otherwise with the proposed changes.
- There were 24 responses to the consultation.
- The majority of respondents generally agree that the implementation of QUs, to replace the current exemptions to the six day standstill (6DSS) rule, could be of benefit, offering a practical alternative.
- Some respondents have reservations over certain aspects of the proposals. Some of the QU Principles, Requirements and Operational Rules are considered to be complex and bureaucratic.
- Respondents believe that QUs are more likely to benefit larger enterprises. Some suggest that the requirements could be difficult for smaller farms to fulfil, both in terms of opportunities to establish a QU and cost, and are concerned about the potential impact on entries at local/smaller shows.
- Respondents recognised the need for the Animal and Plant Health Agency (APHA) to know when QUs are in use for inspections purposes, but expressed their concerns over, and questioned the need for electronic notification of individual animal movements in to and out of QUs within 24 hours of movements taking place. Concerns primarily focused on the limited access to broadband in rural areas.
- With regards to the number of QUs per holding, respondents favoured either Option B (one QU per farm, comprising either one or two separate sites operating as one CPH) or Option D (two QUs per farm with separate CPH numbers). Respondents were of the view that maximum flexibility should be offered to livestock keepers so that they have the opportunity to utilise the mechanism that best supports their circumstances.
- We will continue to develop the QU project, working closely with the farming industry, operational partners and stakeholders, taking into account the consultation responses. We plan to complete the

amendments to the Disease Control (Wales) Order 2003 and lay the amended legislation in September 2016 or as soon as practicable thereafter. The aim is to have procedures and processes in place so that livestock keepers can apply for QUs from December 2016.

1 The Consultation Exercise

1.1 Background Information

Livestock standstill rules were first introduced following the 2001 foot and mouth disease outbreak. Prior to this, movements of livestock were considered to be responsible for significant spread of disease. The current controls require that when livestock are moved onto a holding, a standstill period on that holding is triggered preventing livestock moving off the holding, except direct to slaughter.

A number of exemptions to the standstill rules are allowed to enable specific business activities at certain times of the year. Whilst these could increase the risk of disease spread they are balanced against animal welfare and management needs. The standstill rules and exemptions are specified within the Disease Control (Wales) Order 2003¹.

The *Working Smarter Report*² was commissioned in 2011 to investigate the regulatory burden placed on farmers and land managers. Recommendation 33 of the Report highlighted the unpopularity of the six day standstill (6DSS) rules for cattle, sheep and goats. The many exemptions were also considered complicated and difficult to understand.

We acknowledged that the rules could be simplified and we have been working with the farming industry, operational partners and stakeholders to develop an acceptable improvement to the current standstill rules.

1.2 Consultation Proposals

The Minister for Natural Resources and Deputy Minister for Farming and Food have already agreed to the implementation of the Quarantine Units (QUs) Project.³

The proposals presented in the consultation document⁴ are for a general standstill exemption, applying to cattle, sheep and goats, for holdings using Quarantine Units (QUs). The exemption does not apply to pigs.

Livestock keepers would have the choice of using QUs or adhering to the 6DSS on their whole holding:

- For holdings with a QU, animal movements onto the farm would be direct into the QU and the 6DSS period would be observed there without affecting animals on the remainder of the holding.
- For holdings without a QU, animal movements onto the holding would trigger a 6DSS for the whole of the holding.

¹ [The Disease Control \(Wales\) Order 2003](#)

² [Working Smarter – A report of the recommendations to the Welsh Government on better regulation in farming](#)

³ [Decision Report](#)

⁴ [Consultation on the Introduction of Quarantine Units](#)

The proposed principles, requirements and operational rules for QUs are set out in the consultation document. The new arrangements would simplify the standstill regime by replacing complex exemptions, allowing greater flexibility for livestock keepers while maintaining movement controls to help prevent the spread of disease.

1.3 The Consultation Questions

Respondents were asked to consider four specific questions:

5. To what extent do you agree with the benefit of implementing Quarantine Units (QU) to replace the current 6-Day Standstill Rule exemptions?
6. The Proposed Changes - What are your thoughts relating to the proposed QU process?
7. Nature and number of QUs per farm premises - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.
8. Changes to the Disease Control (Wales) Order 2003 - your views are being sought as to whether you agree or otherwise with the proposed changes.

Respondents were also given an opportunity to comment on related issues which may not have been specifically addressed in the consultation document.

2 Responses to the Consultation

There were 24 responses to the consultation, which are listed at Annex A. Some respondents asked that their personal details not be published. These are listed in Annex A as 'anonymous.'

Not all respondents directly answered the consultation questions. Where this was the case, and for the purpose of this document, the responses have been allocated to the questions where they best fit. In addition, where respondents did answer the specific questions, parts of those answers may have been reallocated to another question where they best fit.

There is a Q&A at Annex B answering some questions asked by respondents.

2.1 Question 1: To what extent do you agree with the benefit of implementing Quarantine Units (QU) to replace the current 6-Day Standstill Rule exemptions?

Most respondents generally agree that the implementation of QUs, to replace the current 6DSS rule exemptions, could be of benefit, offering a practical alternative to the 6DSS. The Wales Animal Health and Welfare Framework (AHWF) Group *“strongly agree with the benefits presented of implementing*

Quarantine Units.” Welsh Lamb & Beef Promotions Ltd (WLBP) said that allowing farmers the opportunity to establish QUs is *“a positive step in raising biosecurity standards generally.”*

The Welsh Livestock Auctioneers Association (LAA) agree with the *“principal of offering the use of quarantine units as an alternative to the current 6 day standstill requirements”* going on to say that the 6DSS *“has limited our customers trading and business decision making throughout the agricultural year but especially at the important trading periods in the spring and autumn.”* Other respondents shared this view and said that QUs could offer increased opportunities to buy and sell animals at livestock markets, and to do so reactively, and lead to less reliance on selling animals straight to slaughter.

Some respondents were critical of the time taken to introduce QUs and said that the change should be introduced as soon as possible.

Not all respondents considered QUs beneficial. David Owen, a respondent, questioned if the 6DSS rule is still justified; *“given the cumulative extent of additional farming regulation introduced since the turn of the century.”* He went on to say that it causes *“immense problems for farmers in terms of time spent on paperwork and expense, and especially at times of the year when they are selling frequently.”*

The Tenant Farmers Association Cymru (TFA) believes that QUs are unlikely to benefit tenant farmers because landlords may not agree to the enhanced biosecurity measures for outdoor QUs if, for instance, shooting rights were let to a third party. In terms of indoor QUs, tenant farmers would have to obtain permission from landlords if alterations were required to existing buildings, which the landlord may not agree to or insist are removed at the end of tenancy.

Most respondents who were generally in favour of QUs had reservations about certain aspects of the proposals. These are summarised below.

Increased Bureaucracy

The majority of respondents said that the proposals appeared complicated and bureaucratic. WLBP and Quality Welsh Food Certification Ltd (QWFC) said that the proposals *“don’t replace complexity with simplicity”* and that *“consequently, many farmers will be inhibited from taking up the option of setting up QUs.”*

The Farmer’s Union for Wales (FUW) said that the changes to the 6DSS should be as *“simple, transparent, cost-effective and easy to use as possible.”*

Another respondent, who wished to be anonymous, said that the *“concept is a good one but the implementation and on-going management could add yet another layer of paperwork, inspections and bureaucracy to an already demanding sector.”*

Practicalities and Costs

Some respondents expressed concerns over the practicalities and costs of establishing and maintaining QUs.

Country Land and Business Association (CLA) Cymru said that several of its members had raised concerns with regards to obtaining planning permission for QUs. They went on to suggest that there may be a need for Welsh Government to *“consider specific planning guidance on the merits of on farm quarantine units to assist local planning authorities to see the need for such developments.”* Furthermore, CLA Cymru also suggests that financial assistance in establishing QUs should be considered under the Welsh Government Rural Communities - Rural Development Programme 2014-2020⁵.

The National Sheep Association (NSA) said that the cost *“needs to be realistic especially if small producers are to be encouraged to take this option up.”*

The British Meat Processors Association (BMPA) supports the changes in principle, saying *“it is a move in the right direction”* and despite concerns over the practicality of establishing QUs, said that *“is not necessarily a reason to not introduce the changes.”* BMPA asked that practicalities, such as separate access, the biosecurity procedures, separate effluent management etc., be considered again.

Isolation Units

One respondent, who asked to be anonymous, does not feel the current rules are complicated or difficult to understand. Referring specifically to Isolation Units, which would be replaced by QUs, they said that *“the existing arrangements for an isolation unit work extremely well on our farm, allowing us to take part in world class agricultural shows with our top class stock, without impacting on the 'commercial' side of the farm. This opportunity would be denied us under the proposed QU arrangements. Showing our stock at the RWAS⁶ and others is an important 'shop window' for our native breed sheep.”*

The Badger Faced Sheep Society is concerned that if livestock keepers do not take up QUs there will be an impact on exhibitor numbers at smaller and local shows. Another respondent, who wished to remain anonymous, with the same concern suggested that Isolation Units should be retained for small/hobby farmers.

Small v Large Enterprises

Respondents believed that QUs are more likely to benefit larger enterprises. Some suggested that the requirements could be difficult, if not impossible, for

⁵ [Welsh Government Rural Communities – Rural Development Programme 2014-2020](#)

⁶ [Royal Welsh Agricultural Society](#)

smaller enterprises to fulfil, both in terms of opportunities to establish a QU and cost.

The Pygmy Goat Club said that the proposals take *“no account of the smallholder or individual who keeps, breeds and shows livestock kept primarily as pets or as a hobby.”* They go on to say that Isolation Units provide greater flexibility and accommodate the smallholder more effectively.

2.2 Question 2: The Proposed Changes - What are your thoughts relating to the proposed QU process?

Respondents were asked for comments on four areas relating to the proposed QU process.

1. Applying for a QU

One respondent, who asked to be anonymous, said that the process appears logical and workable. Others however are concerned that it appears too complicated. Hybu Cig Cymru (HCC) said that they are *“concerned that, despite the intentions to simplify the six day standstill arrangements, the requirements for compliance and the costs associated with certification and renewal of Quarantine Units may be a significant barrier for many farmers in Wales from taking up the option.”*

The FUW sought assurances that the information and language contained in any guidance to livestock keepers is *“appropriate and ‘farmer-friendly’ in order to avoid costly errors and lengthy delays in the process”* going on to say that *“this is especially important given that any major errors could see the cessation of the application and a requirement for the livestock owner/keeper to pay another fee.”*

NFU Cymru sought assurances that the interactions between Government, Government Agencies and Certification Bodies, detailed in the process flows on pages 11 to 21 of the consultation document, are done in a timely manner so that livestock keepers do not face any undue delays. WLBP advised that Welsh Government, as scheme owner, can set its own time limit for applications to be processed; *“it doesn’t have to be 21 days, it can be fewer or more”* (see step 6b, page 12 of the consultation document).

The British Veterinary Association (BVA), HCC, the TFA and the Wales (AHWF) Group suggested that there could be a role for veterinary practitioners, either in terms of an alternative to a Certification Body, an inspection body, or on an advisory basis. The TFA suggested that a farmer’s own vet *“might be in a better position to assess that particular farm’s biosecurity needs/risks.”*

The BVA proposed that, beyond the facilities themselves, *“veterinary knowledge and expertise in disease control may be essential in the development of the inspection criteria, inspection and assessment of the*

appropriate use of QUs and in addition would contribute to improved general biosecurity awareness and practices on farms considering QUs.”

2. Validation and Allocation of QU CPH Numbers

Some respondents are concerned that the process flow seems overly complicated. CLA Cymru said *“it is imperative to the perceived success of this scheme that the farmer is not inconvenienced, confused or expected to intervene between the various government departments involved. The farmer’s responsibility should be clear concise and unambiguous.”* The FUW suggested that it would be beneficial for the QU certificate to include a reminder to the livestock keeper that they must inform the British Cattle Movement Service (BCMS) to register the QU CPH on the Cattle Tracing System (CTS) system and/or update EIDCymru (for sheep and goats).

The Wales AHWF Group said that it would welcome clarification on the processes and timings around the appeals process.

The NSA, NFU Cymru, FUW and WLBP said that they would have preferred to see a QU being part of an existing CPH and not allocated a new CPH (see page 34 of the consultation document) with the FUW going on to say that it *“would have welcomed an inclusion of this issue within the consultation process.”*

WLBP and QWFC accept the proposals for the validation and allocation process, but believe that discussions will need to take place between the Welsh Government, the United Kingdom Accreditation Service (UKAS) and Certification Bodies before the full process can be accepted as complying with ISO⁷ standards (in relation to ISO17065 - Conformity Assessment - Requirements for bodies certifying products, processes and services). Both WLBP and QWFC also ask for further clarification on whether Certification Bodies or the Welsh Government should be responsible for addressing errors made by livestock keepers in their CPH application (see Step 4, page 14 of the consultation document).

3. Maintaining a QU – 18 month re-approval

The Wales AHWF Group stated their support for the proposals set out in the consultation document with regards to re-approval.

The FUW said that some of its members queried the justification for 18 month re-approval, with several suggesting three years would be a *“more acceptable time frame for renewal.”* Other members suggested that accreditation should *“be for the lifetime of the unit; with inspections providing the mechanisms by which to correct any issues.”* One respondent said that there should be no charge for re-approval.

⁷ [International Organization for Standardization](#)

CLA Cymru favours biennial re-approval because *“most farmers who install QUs will begin the process at a time convenient to their normal trading pattern.”*

Whatever the review period, respondents said that businesses require certainty and consistency, and that re-approval should be a simple and low cost process for the livestock keeper. The LAA, WLBP and QWFC said that they believe it should be the role of Certification bodies to notify livestock keepers when a QU is due for re-approval (this is a slight variation to the process set out on page 17 of the consultation document). NFU Cymru suggested that, where possible and as a means of stream-lining the process, this should be tied in with farm assurance scheme re-approval for those farmers who are members of such schemes.

4. QU in-use inspections

WLBP and QWFC believe that further discussions may be necessary with UKAS in respect of the proposal that APHA undertake inspections. WLBP advises that in order to validate the effectiveness of the process, UKAS may also expect Certification Bodies to undertake in-use inspections as well. QWFC said that they *“find it difficult to understand why APHA will be required to inspect the QUs when in-use”* given that APHA will *“not be within the scope of a certification body’s control processes.”* Under the current proposal, if APHA finds a case of non-compliance it must report it to the Certification Body to investigate. QWFC sees this as *“doubling the work”* and suggests that *“it would be far simpler, efficient and cost effective for the in-use inspection to be undertaken by the Certification Body that has certified the QU in the first place”*, adding that it *“would also save Welsh Government money and not add much to the cost for certification bodies.”*

Both farming unions said that the appeals process relating to the suspension of a QU following suspected non-compliance must be transparent and have clear timelines.

NFU Cymru went on to say that if a Tribunal is set up then *“it is vital that Tribunal members have a good practical knowledge of livestock keeping, livestock reporting and recording rules and Quarantine Units.”* They are also of the view that the temporary removal of the QU until the non-compliance is rectified is sufficient penalty for livestock keepers. The FUW said that several of its members commented that it was essential that livestock keepers be given sufficient time to rectify any issues that have been brought to light following an inspection.

Some respondents were concerned over unannounced inspections, preferring that short notice be given prior to inspection. One said that they worked full-time, away from their holding, so were unlikely to be home if there was an unannounced inspection.

The FUW said that it *“believes that the use of unannounced inspections should follow the principles of earned recognition as this represents a proportionate and risk-based approach to compliance.”*

NFU Cymru requested that a matrix for deciding who and when to inspect be made available as soon as possible. NSA asked for clarification over the percentage of in-use inspections likely to be employed.

Additional Comments on QU Principles, Requirements and Operational Rules

Several respondents said that the QU Requirements and Operational Rules seemed overly burdensome. To ensure maximum buy-in from the industry, the Wales AHWF Group suggested that the implementation of QUs should be *“as simple and effective as possible”* and that *“the rules will need to be clearly understood.”* These comments were echoed by the majority of respondents, with both WLBP and QWFC saying that guidance notes need to be provided that *“will give a better interpretation of the use of the QU.”*

Examples of some responses to the QU Principles, Requirements and Operational Rules are provided below:

<p>QU Principle: Electronic notification of animal movements within 24 hours and individual identification of animals would be required to ensure inspections can be carried out on in-use facilities.</p>

Respondents recognise the need for APHA to know when QUs are in use for inspections purposes. However, both farming unions, TFA, CLA Cymru, LAA, NSA, WLBP, QWFC and the Badger Face Sheep Society expressed concerns, and questioned the need for, electronic notification of individual animal movements into and out of QUs within 24 hours of movements taking place. Concerns were mainly focused on the limited access to broadband in rural areas.

Alternatives suggested included allowing livestock keepers to report that a QU is in use from a given day, including the number and species of animals within the QU, by phone or by text. Individual animal identifiers could then subsequently be inputted on either the CTS or EIDCymru, as they are currently, and checked during inspection.

For animals leaving QUs, NFU Cymru suggested that livestock keepers should not need to report these movements once the period of quarantine has been completed, going on to suggest that an automatic process be set up via CTS and EID Cymru, and that this *“would be an excellent example of better regulation and maximising the benefits of electronic reporting processes.”*

While noting the concerns surrounding 24 hour reporting, in their response HCC go on to say that *“whilst accepting that some localities in Wales cannot currently access broadband or mobile data facilities, the availability of online movement reporting through EIDCymru does provide a mechanism that could*

enable farmers to report movements quickly and easily. The increasing availability of broadband and of online access via mobile networks and smartphone applications means that this capability is likely to increase in future years.”

The Badger Faced Sheep Society suggested that the identification and movement rules that apply to cattle, sheep and goats should also apply to camelids.

QU Requirement: An indoor QU facility should consist of a separate building and/or field, with its own dedicated access, effluent management, feeding and welfare arrangements. There should be no direct contact with other animals on the farm.

Responses:

- *“Indoor facilities should not necessarily consist of a separate building if it can be shown that animals are kept completely apart and do not share air space.” (WLBP and QWFC)*
- *“We do not agree with the need for a separate building provided the requirements for a field based QU could be met.” (NSA)*

QU Requirement: An outdoor QU facility should provide effective separation between quarantined and other animals with stock proof double-fencing at least 3 metres apart, with its own dedicated access, effluent management and feeding arrangements. There should be no direct contact with other animals on the farm.

Responses:

- *“Double fencing with a separation of 3m would be acceptable in an open field but if there are barriers in place (such as hedges or walls) that prevent nose to nose contact with neighbouring stock then that should be accepted as sufficient for separation.” (WLBP and QWFC)*
- *“Several respondents [members responding to FUW] queried this 3 metre separation and added that considerable expense would be required to make this QU a viable option. Members sought clarity on the reasoning behind this distance” (FUW)*
- *“Will single stock fencing of fields with no stock in the neighbouring field during quarantining comply or an arable field next door with the next stock field for instance 100 metres away and properly fenced?” (NSA)*
- *“We fully agree that the QU unit should provide effective separation between quarantined and other animals and that procedures must be in place to ensure dedicated access, feeding and effluent management. However we do not believe that the detailed rules need to be overly prescriptive e.g. by setting out that stock proof double fencing must be at least 3 metres apart. NFU Cymru believes that it is*

more important that the applicant shows how separation, feeding and effluent management is achieved rather than a complex and prescriptive set of rules / measurements etc.” (NFU Cymru)

QU Operational Rules: People entering a QU must either wear dedicated clothing, gloves and footwear or use items that can be disinfected, ensuring that they are cleansed and disinfected when entering and leaving a QU. **And:** If dedicated gloves are not used hand washing facilities must be available for people entering and leaving a QU.

Responses:

- *“We believe that this should be appropriate to the task in hand, i.e. the type of clothing required to carry out a walk through a field of sheep in an outdoor QU to check that they are all okay will be entirely different to that required to dose, inject and scan the same group of sheep.” (NFU Cymru)*
- *“Expecting livestock keepers to disinfect their clothes or wash their hands when entering or leaving a QU does not distinguish between the varying reasons a QU may be entered.” (FUW)*
- *“Farmers entering a QU to observe their stock should not necessarily have to adhere to the full cleansing and disinfecting requirements proposed. Clearly if stock is being handled then farmers must adhere to those processes. Measures need to be proportionate to the level of risk.” (WLBP and QWFC)*
- *“This is a clear biosecurity measure related to highly transmissible diseases such as F&M. We would rather see more simple measures that were less draconian and encourage people to quarantine for endemic diseases.” (NSA)*
- *“Needs to be practical – it could be a requirement that a separate set of disposable overalls is used when feeding or checking stock in a QU, or that washables could be used and cleaned prior to entry into and exit from a QU. We should be employing measures that would be proportionate to prevent the spread of diseases such as Maedi Visna or internal parasites – in the case of a highly contagious exotic we would support movements being shut down.” (NSA)*

QU Operational Rules: No feed, equipment or machinery to be shared between the farm and its QU, except where feed can be ‘dropped’ into the QU by equipment, which has been thoroughly cleansed and disinfected before its use. **And:** Incoming animals must be transported directly into a QU and the transporting vehicle must be thoroughly cleansed and disinfected when entering and leaving the QU.

Responses:

- *“Equipment can be shared surely but should be cleaned prior to sharing. This requirement should simply prevent contamination. It is unrealistic to expect a dedicated tractor but to ask for the*

wheels/contact areas to be sprayed with disinfectant while between resident and quarantine stock would seem to be reasonable.” (NSA)

- “The requirement to cleanse and disinfect transporting vehicles when entering and leaving a QU is extremely stringent and represents an unwelcome addition to current standstill regulation.” (FUW)
- “It should not be necessary for vehicles transporting animals into a QU to be cleansed and disinfected on the way in to a QU.” (WLBP and QWFC)

2.3 Question 3: Nature and number of QUs per farm premises - your views are being sought as to which option should be considered further and whether there are any other pros or cons that have not been considered.

The following options were presented in the consultation:

- Option A:** Only one approved QU per farm on only one site (which could comprise both indoor and outdoor facilities).
- Option B:** Only one QU per farm, comprising either one or two separate sites operating as one unit i.e. any animals entering either site would restart the 6DSS on both sites.
- Option C:** Two QUs per farm with separate CPH numbers, but only one can be in use at one time.
- Option D:** Two QUs per farm with separate CPH numbers and both can be in use at the same time.

Respondents favoured either Option B or Option D. No comments were received in respect of Options A or C.

The Wales AHWF Group and the BVA support Option B, which could provide for an indoor and an outdoor QU managed under the same CPH. The BVA believes this option balances “*flexibility for the farmer and ease of administration and management.*” TFA said that Option B appeared to be “*the best*”, but that this would depend on the outcome of the CPH consultation and whether or not multiple CPH numbers within a ten-mile radius of the main holding is retained.

Some respondents did not favour one option over the other. HCC, CLA Cymru and NFU Cymru are of the view that maximum flexibility should be offered to livestock keepers so that each keeper has the opportunity to utilise the mechanism that best supports their business model and circumstances.

The National Beef Association (NBA) said that Option B “*seems to give the best combination of flexibility with the least burden of reporting*” but that Option D, in allowing for the greatest flexibility, could in practice “*be very messy to control.*” WLBP and QWFC also see merit on both Option B and Option D.

The FUW believes that Option D offers the greatest flexibility for livestock keepers, allowing *“producers adopting QUs the most practical solution to moving different species or sexes of animals at the same time.”* The NSA and LAA are also favour Option D.

One responded, who did not want their details published, said that more information and guidance is required so that potential applicants can have a better understanding of how the proposed options could be implemented.

Additional Comments

The BVA said that it remained *“concerned that outdoor QUs may be less effective at mitigating the risk or spread of disease, particularly for airborne diseases, and would suggest that it may be sensible to inspect outdoor QUs more frequently when they are in use to address this.”*

The FUW reported that members believed that farmers should only be required to pay for one accreditation per holding, regardless of how many QUs were in place.

2.4 Question 4: Changes to the Disease Control (Wales) Order 2003 - your views are being sought as to whether you agree or otherwise with the proposed changes.

Most respondents did not answer this question. The majority of those that did answer this question were those that generally welcome the introduction of QUs and agree with the proposed changes to the Disease Control (Wales) Order 2003.

The BVA supports maintaining the exemption for stock visiting veterinary premises.

Reference 19 on page 32 of the consultation document refers to a proposed change to the exemption for the arrival of goats for breeding. The Welsh Government position is that this exemption should be amended so that rather than serve six days in isolation at the premises of origin, as per the current exemption, incoming goats should instead be placed in a QU for six days upon arrival at the premises of destination. To secure the standstill exemption, the movement onto the holding would be declared as being via an approved QU. Melina Jones, a goat keeper, suggested that this *“is unworkable for goats as owners bring goats on the day following 6 day quarantine. It creates additional cost and restricts the number of does that can be served. This affects billy revenue and will discourage breeders offering the service.”*

Next Steps

This document has been considered by the Welsh Livestock Identification Advisory Group (LIDAG). It was then presented, along with the consultation responses and advice on the next steps, to the Deputy Minister for Farming and Food.

We will continue to develop the QU project, working closely with the farming industry, operational partners and stakeholders, taking into account the consultation responses. We plan to complete the amendments to the Disease Control (Wales) Order 2003 and lay the amended legislation in September 2016 or as soon as practicable thereafter. The aim is to have procedures and processes in place so that livestock keepers can apply for QUs from December 2016.

Annex A

List of Respondents

Anonymous x 3
Animal Health & Welfare Framework Group
Badger Face Welsh Mountain Sheep Society
British Veterinary Association
CLA Cymru
David Owen
D Roberts
Farmers' Union of Wales (FUW)
Hybu Cig Cymru
John Edwards
Melina Jones
National Beef Association
Natural Resources Wales
National Sheep Association Cymru
NFU Cymru
Quality Welsh Food Certification Ltd
Tenant Farmers Association Cymru
The British Meat Processors Association
The Pygmy Goat Club
Welsh Lamb & Beef Promotions Ltd
Welsh Livestock Auctioneers Association
William Williams-Wynne

Q&A

Q. Why does stock-proof double-fencing need to be at least three metres apart for outdoor QUs?

A. A three metre gap between boundary fences will prevent direct contact between neighbouring livestock and minimise the risk of short-distance airborne disease transmission.

Q. Will there be a fee for in-use inspections?

A. No. QUs will be subject to unannounced in-use inspections by the Animal and Plant Health Agency (APHA) to ensure compliance with the QU Requirements and Operational Rules. There will be no charge to the livestock keeper for inspections carried out by APHA. Where non-compliant, QUs will, subject to the severity of that non-compliance, be suspended or revoked. However, where revoked, Certification Bodies will charge livestock keepers a fee for recertification.

Q. Can a QU be used all year round?

A. QUs can be used all year round. The current exemption under the Disease Control (Wales) Order 2003 for the movement of rams and bulls intended for breeding to a market (provided that they have been placed in an approved Isolation Unit for six days prior to the movement) covers the period from 1 August to 1 December. This exemption will be amended and livestock keepers must place any incoming stock into their QU to secure an exemption from standstill for other resident stock, or adhere to the 6DSS on the whole holding. To secure the standstill exemption, movements of incoming stock must be reported and therefore declared as being via an approved QU.

Q. What will the rules be for moving livestock to and from shows?

Animals do not have to undergo quarantine before or after attending shows. However, normal 6DSS rules do apply to show movements and QUs can be used, as Isolation Units currently are, to manage movements. If attending consecutive licensed shows, animals will be allowed to leave a QU in under six days, provided they undergo six whole days quarantine after returning from the last show. Individual animal movements to and from shows must be reported within 24 hours.

Q. If animals need to leave the QU for veterinary treatment will the 6DSS have to restart when they return?

A. Animals will be allowed leave a QU for veterinary treatment, but on return, and provided they have not been in contact with any other animals, they must return directly to the QU and complete the remainder of the six day standstill period.