

Michael Creed, T.D.  
Minister for Agriculture, Food and the Marine  
Department of Agriculture, Food and the Marine  
Agriculture House  
Kildare Street  
Dublin 2

Sent by Post & Email

31 October 2016

**Re: Public Consultation on a New National Farmed Animal Health Strategy**

Dear Minister,

The Irish Co-operative Organisation Society (ICOS) welcomes the development of a new National Farmed Animal Health Strategy. ICOS is a co-operative umbrella organisation that serves and promotes commercial co-operative businesses and enterprise, across multiple sections of the Irish economy. We represent 130 co-ops that collectively have over 150,000 individual members, with a combined turnover of €14 billion and employ more than 12,000 people in Ireland.

The majority of Irish dairy co-ops are multi-purpose operations with interests in milk processing, liquid milk, consumer foods, agri-trading and feed milling. The Irish dairy sector is predominately farmer owned and controlled, with 10 milk processors and 17 milk purchasing co-ops. Irish dairy products are exported to markets throughout the world, valued at €3.24 billion in 2015. There are over 60 livestock mart co-ops throughout Ireland, which provide a valuable alternative market outlet for farmers, with a collective turnover of over €1 billion that is geographically spread right across the rural economy. Furthermore, ICOS represents a range of breed societies, animal health and AI societies.

First and foremost, ICOS believes that it is important to acknowledge that Ireland's farmed animal population including 6.7 million cattle and 4.6 million sheep have a high animal health status. This is in part due to our grass based, extensive production system operated in Ireland. This system of grass based, family run, small to medium farming operations is key to our marketing efforts and is instrumental both to our productive efficiency and high animal health status. In addition, there is an extremely high level of husbandry and management standards at farm level, together with a strong advisory and education network available to farmers including a range of extension and support services provided to farmers by their co-operatives. For example, the CellCheck Programme coordinated by Animal Health Ireland, and supported by co-op advisory teams has in recent years resulted in a significant reduction in the level of Mastitis on Irish dairy farms.

However, we agree that there is no room for complacency and that the right approach to addressing animal health risks is by working in partnership, through a whole of industry

approach. ICOS also fully subscribes to the principle of 'prevention is better than cure', which is a central theme of the consultation document.

In the context of your consultation, ICOS would like to address the following points:

- Animal health is an unquestionable priority for our members across the entire livestock sector. ICOS members recognise that a key component of the food supply chain is the health and welfare of farmed animals, which underpins consumer confidence and the reputation of Irish food produce, which is exported globally. Dairy co-operatives in particular, proactively engage with their members on animal health issues with the provision of services such as bulk milk disease screening and a range of advisory and veterinary services. These services include expertise, advice and education regarding hygiene procedures, biosecurity measures, appropriate vaccine and anthelmintic usage and the publication and distribution of farmer information leaflets and booklets on infectious diseases.
- Furthermore, ICOS and its members has strongly supported Animal Health Ireland (AHI) since its inception in 2009. AHI has played an important role in reducing the level of Mastitis through the CellCheck Programme and despite challenges, the BVD eradication programme has made significant progress in recent years. Programmes such as these have had a significant impact on the dependence and use of antibiotics and illustrate the effectiveness of preventative measures. ICOS is committed to AHI as the most appropriate body to deliver coordinated control programmes for non-regulated diseases of livestock. However, there are significant challenges remaining in the area of animal health, and ICOS believes that the development of a National Farmed Animal Health Strategy is an appropriate opportunity to review and assess the role of all bodies with statutory and non-statutory roles in the area of animal health and to strengthen and re-evaluate responsibilities where appropriate.
- Veterinary medicines and vaccines are vital tools in ensuring that farm animals stay healthy by preventing the spread of disease. The distribution and use of veterinary medicines is closely regulated and monitored under EU and national legislation. ICOS supports the existing regulatory regime, which enables alternative distribution channels for the sale of certain veterinary medicines and vaccines and provides an enhanced prescribing regime for intramammary treatments. The distribution and sale of veterinary medicines takes place through strictly controlled channels. These include co-ops whereby trained staff with expertise and knowledge in the epidemiology of infectious diseases and parasite infections as well as proficiency in appropriate usage and administration. The industry has invested heavily in recent years in the development of a FETAC level 6 training programme for 'responsible persons' working in Co-ops and Licenced Merchants. ICOS strongly believes that any additional restrictions beyond existing controls on the sale of veterinary medicines could restrict competition, limit availability and unnecessarily increase the cost burden on farmers. Within this context the regional state laboratories need to be maintained and enhanced to provide for the rapid diagnoses of infectious agents and the appropriate and responsible use of therapies to cure an animal whilst avoiding the risk of the development of anti-microbial resistance.
- The animal feed chain is another key area identified in the consultation document. ICOS members purchase almost 70% of native grains and produce almost 70% of

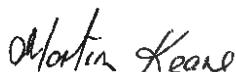
compound animal feeds. Co-ops involved in feed milling adhere to the highest international standards and strict quality criteria and oversight by the Department of Agriculture. ICOS therefore supports the robust and fully traceable farm animal feed system that is currently in place.

- The development of a new National Farmed Animal Health Strategy must work in tandem with the livestock mart sector, which provides farmers with an important alternative outlet to market their livestock in an increasingly restricted marketplace. Animal movements are an integral part of Irish cattle and sheep production and are the basis on which our green image of animal production is based. Any new potential farmed animal strategy must ensure this valuable marketing structure remains intact in its current structure for cattle and sheep farmers. Reducing the challenges of infectious agents and increasing biosecurity can be achieved in conjunction with ensuring farmers have access to all possible marketing avenues for their livestock.
- An integral part of our pasture based cattle and sheep production is the unfortunate and unpredictable nature of contact with wildlife that can and does spread certain infectious diseases. We must ensure all future strategies include mechanisms whereby the level of cross infection between farmed and non-farmed wildlife is minimised and reduced through a combination of controlled population management in certain regions and /or vaccination programmes. These control measures can only be conducted by the Department of Agriculture and need priority in certain geographical areas.

Irish co-ops are food businesses and one of the purposes of creating a National Farmed Animal Health Strategy is to underpin and verify Ireland as being a global leader in the production of safe food products from healthy animals. A complete and holistic approach to farmed animal production is the best way forward to produce healthy animals and our co-ops are best placed to achieve this. They use lean principles across all their businesses and are constantly adopting best practices. The dissemination of knowledge and support in farmed animal health via co-op advisory staff in conjunction with Teagasc, ICBF and AHI will actively support best practice adoption.

Finally, ICOS reiterates its support for the development of a National Farmed Animal Health Strategy and looks forward to engaging with you on this important matter for all participants in the food supply chain.

Yours sincerely,



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Martin Keane  
President