

Benchmarking Dairy and Beef Youngstock and Farms Using National Traceability Database Data

Please find below comments from the Farmers' Union of Wales in relation to the above consultation.

General Comments

There was consensus amongst FUW members that any future requirements for AMU data provision should not create more bureaucracy for producers and should not duplicate or add administrative burden above current AMU data recording.

Members were extremely concerned about the potential for duplication at farm-level and queried how the AMU methodology proposed would fit with the AMU recording that already occurred. In particular, members noted the requirement for additional youngstock categories and expressed concern about the administration associated with this. The FUW notes that core AMU recording will remain at the farm level and would seek to ensure that any moves towards national level recording, and standardised practises, do not require the provision of any extra data from producers.

FUW members queried where in the supply chain the responsibility lies for the provision of the end calculation. Medicines purchased by livestock producers are currently recorded by the veterinary practitioner and this includes the species of animal, name of drug, quantity, bottle batch numbers, expiry dates and withdrawal times. Members believed that better use of current data streams should be evaluated in order to reduce duplication in data provision.

The FUW recognises that veterinary data on antibiotic use in the dairy sector could be transported to the electronic medicines hub and that this could in turn be linked to farm records. However, where this data is not available in a sector specific manner (e.g mixed beef and sheep enterprises) further discussion on data cleaning via veterinary practitioners may be required.

The FUW is aware that technological advances would need to be made in order to ensure ease of use in data provision. For example, it will be essential to ensure that data already provided in an electronic format by producers in Wales (e.g. the FAWL medicines book) is compatible with - and can be read by - the future electronic medicines hub. The FUW would oppose moves which created duplication for Welsh producers.

Given the above, it will be essential to ensure that AMU policies are not established before the technology required to adhere to them. Many farmers in Wales suffer from a lack of technologies, such as broadband and phone signal, that would be considered basic in an urban setting. This technology asymmetry must be taken into account in discussions which rely heavily on electronic recording.

Members noted that any additional work at farm level would be highly unlikely to result in any additional income as retailers, milk buyers and assurance bodies already require some form

of AMU recording. There was significant concern that this new methodology would only serve to create yet another portal of information transfer; with no discernable gain to the producer.

Notwithstanding the above, and given the potential significant investment in technology, members believed that any future AMU recording system must be future proofed and must be compatible and acceptable to the requirements that will arise in our future trade environment.

Given current pressures facing the industry - including Brexit and the lack of protection for domestic producers in the UK Agriculture Bill - members agreed that imported produce must meet the same data recording requirements in order to ensure parity and competitiveness. Whilst the FUW recognises that this is outwith the scope of the current consultation, the union believes that it is imperative that competitiveness is considered when developing new and additional requirements for domestic producers.

In addition, given the expected move away from farm subsidies towards 'payments for public goods' members believed that AMU recording as a mechanism to reduce antibiotic use, should be considered as a public good. This would ensure that the work of domestic producers in reducing medicines use and in providing farm-level data is recognised.

Technical Comments

Some members commented that there were too many categories and queried the evidence base for the emphasis on youngstock AMU recording within the present document.

With reference to the number of categories there was a suggestion that the critical points for AMU recording were (1) calving to weaning (2) weaning to bulling and (3) bulling to calving. Other members believed that calves up to weaning and then weaning to calving would cover youngstock antibiotic use.

Some members stated that the youngstock category which ranged from 8 weeks old -12 months of age was too broad to ensure that an average weight was a true reflection. Other members believed the categories to be appropriate. Members suggested that differences in the weights within this category could be as much as 200-300kgs depending on breed and how the animal has been reared.

Please get in touch if you have any queries regarding the above.

FUW Policy Department