

Tenant Farmers Association
Mandatory Animal Health and Welfare Reviews

1. Introduction

- 1.1 The Tenant Farmers Association (TFA) is the only organisation dedicated to representing the interests of those who do not own the land they use for agriculture, principally through tenancies but also via other means, in England and Wales. Its membership comprises farms of all types and sizes but active, family farms predominate.
- 1.2 The TFA welcomes the opportunity to respond to the consultation issued by the Department for Environment, Food & Rural Affairs (DEFRA) on the proposal to introduce mandatory animal health and welfare reviews as part of the Animal Health and Welfare Pathway.

2.0 The introduction of a mandatory Animal Health and Welfare Review (AHWR)

- 2.1 We support the overall objective of improving animal health and welfare standards and strengthening disease prevention across the livestock sector. However, careful consideration is required to ensure that any move towards mandatory requirements is proportionate, practical and does not place undue burdens on farm businesses.
- 2.2 While there are clear benefits associated with regular veterinary engagement and structured health planning, any mandatory framework should:
- Build upon the successes of the existing voluntary scheme.
 - Remain proportionate to the scale and risk profile of different farming businesses.
 - Avoid introducing unnecessary administrative burdens.
 - Ensure adequate veterinary capacity across England.
 - Be accompanied by appropriate financial and technical support.
- 2.3 It is important that policy development recognises the diversity of farming systems across England and allows sufficient flexibility to accommodate different production models.
- 2.4 Regular veterinary review of livestock health and welfare can provide significant benefits in terms of disease prevention, productivity and welfare outcomes. However, before introducing mandatory requirements, DEFRA should consider veterinary capacity, as there are ongoing concerns regarding the availability of farm animal veterinary services in certain regions. Any mandatory review system

must be supported by sufficient veterinary capacity to deliver reviews without creating delays or increasing costs for farmers.

- 2.5 Proportionality of mandatory reviews, a one-size-fits-all approach may not be appropriate especially considering the extensive work that some herds and flock are already undertaking to improve animal health and welfare.
- 2.6 Furthermore, any mandatory review must be designed to minimise additional paperwork and ensure that reviews remain practical and outcome-focused, rather than becoming a purely compliance-driven exercise. Requirements should align with existing farm assurance standards and avoid duplication where equivalent measures are already in place.

3.0 Introducing mandatory Flock Health Plans for Sheep

- 3.1 The proposal to require sheep producers above certain flock sizes to produce formal flock health plans could contribute positively to improved disease management and welfare outcomes. However, the TFA are acutely aware that they should remain practical working documents, rather than static compliance records and build on existing on farm practices, as many producers already work with veterinarians to manage flock health.
- 3.2 The TFA believes that while there may be merit in sharing data from parasite control plans, it would need to be a robust program which has a purpose and goal to deliver tangible outcomes to its users. Another “tick box” exercise without results is not required within an industry which already overburden with red tape.
- 3.3 While the TFA would warn against the use of DEFRA templates or required use of guidance, if they are deemed to be necessary, they must be simple, accessible and have an offline capability.
- 3.4 DEFRA should also avoid duplicating requirements that may already exist through farm assurance schemes or existing veterinary health planning arrangements.

4. The introduction of a mandatory Bovine Viral Diarrhoea (BVD) eradication programme

- 4.1 The proposed mandatory BVD eradication programme represents a significant and largely positive step forward for the English cattle industry. Its clear outcome would achieve improvements for animal health, productivity, and environmental outcomes which aligns well with both industry goals and eradication regulations with Scotland, Wales and Northern Ireland.
- 4.2 The TFA have previously lobbied that mandatory tissue sampling tags should be introduced for all newborn calves, which also can be used as official ID tags. This minimises the number of tags that are applied to a calf’s ear, limits cost and

reduces typographical errors at the BVD testing laboratory. It would also remove any ambiguity of results from check testing.

Furthermore, to reduce the burden on the farmers, results should be automatically reported from the lab to DEFRA.

- 4.4 In line with current policy, aborted or stillborn calves should be tested within 7 days as far as reasonably practical. This requirement has no impact on the herd's BVD status but will be used to gather evidence of dams with BVD which should then be tested to identify any which would flag as a Persistently Infected (PI).
- 4.5 The TFA believes that both the dairy and consequently, the beef sectors are already making strong progress in testing for and eradicating BVD through their own industry-led initiatives. Many sales centres and auctioneers now enforce strict rules regarding the sale of PI or untested animals. Given this level of self-regulation, we do not consider it necessary to introduce mandatory rules governing the movement and sale of such animals.

5. The introduction of a mandatory Porcine Reproductive and Respiratory Syndrome (PRRS) control and eradication programme

- 5.1 The TFA broadly supports the introduction of a mandatory Porcine Reproductive and Respiratory Syndrome (PRRS) control and eradication programme for pigs, recognising the significant economic and animal health benefits that a coordinated national approach could deliver. Increasing the levels of transparency within the sector, including the availability of herd-level PRRS status information and mapping to help inform livestock movement and purchasing decisions would be beneficial.
- 5.2 In particular, there is agreement that farms identified as PRRS-positive or unstable should be required to implement control measures and that repeated reinfections should trigger enhanced veterinary involvement and additional biosecurity reviews.
- 5.3 While supportive of the proposed phased approach overall, timelines should remain flexible and subject to review. It is important that each phase is only progressed once the industry has demonstrably achieved the objectives of the preceding stage, as moving forward prematurely could undermine the effectiveness of the programme and reduce industry confidence.
- 5.4 In relation to vaccination data, we consider that relevant information should be made available where necessary ahead of the sale or movement of pigs, however there should be no mandatory requirement to routinely submitted directly to Defra.

6. Participation in Disease Control and Eradication Programmes

- 6.1 Where participation becomes mandatory, government should ensure that farmers receive clear guidance, technical support and where appropriate financial assistance to meet new requirements.
- 6.1 Enforcement action should only be used as a last resort, in specific cases where mandatory requirements are being purposely flouted.

7. Alignment with the Animal Health Law

- 7.1 The consultation notes that the proposed measures would go beyond the requirements contained in Article 25 of the EU Animal Health Law.
- 7.2 While higher domestic standards may deliver benefits, DEFRA should ensure that any additional requirements are evidence-based, proportionate and compatible with existing regulatory frameworks.
- 7.3 Clear communication will be essential to ensure that farmers understand the rationale for requirements that exceed baseline legal obligations.

8. Implementation Considerations

- 8.1 Should DEFRA proceed with mandatory requirements, several implementation issues should be addressed including a phased and gradual implementation period, which would allow farmers and veterinary practices time to adapt and fully understand the new requirements.
- 8.2 The current funded voluntary review programme has been an important incentive for participation. And it is vital that continued funding support is available to ensure uptake and minimise financial pressure on farm businesses. It is vital that any mandatory requirements do not place extra financial pressure on farm businesses.
- 8.3 All mandatory requirements should align with existing farm assurance standards and avoid duplication where equivalent measures are already in place. Furthermore, it is vital the communication is clear so that farmers are aware how reviews will be conducted, what documentation will be required and how compliance will be assessed.

9. Ritual slaughter

- 9.1 Although strictly speaking beyond the scope of this consultation, the TFA is concerned about certain practices taking place in abattoirs involved with ritual slaughter. Although unverified, video evidence has been circulating on various websites and social media channels of horrific practices involving animals being slaughtered without being pre-stunned.

- 9.2 In an era where we are trying to demonstrate our world leading animal welfare credentials, such practices must not be allowed to continue. Whilst respecting the religious sensitivities in play, we must police those abattoirs where ritual slaughter is being undertaken and ensure that all animals are treated humanely and without unnecessary suffering.
- 9.3 The TFA believes that pre-stunning should be a basic requirement for all ritual slaughter within UK abattoirs.

10. Conclusion

- 10.1 Improving animal health and welfare is a shared objective across government and the livestock industry. The existing voluntary animal health and welfare reviews have demonstrated the value of veterinary engagement and structured health planning.
- 10.2 If DEFRA decides to introduce mandatory elements within the Animal Health and Welfare Pathway, it is essential that the approach remains proportionate, practical, well-resourced and most importantly is supportive of farmers and delivers benefits to their businesses.
- 10.3 Continued collaboration with industry stakeholders will be critical to ensuring that the policy delivers meaningful improvements in animal health and welfare, while maintaining the sustainability and competitiveness of the livestock sector.

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