

## Final Business and Regulatory Impact Assessment

### Title of Proposal

Increase of statutory charges levied in respect of services delivered in Scotland by the Animal Health and Veterinary Laboratories Agency (AHVLA) on behalf of Scottish Ministers through the introduction of the Animal Health (Miscellaneous Fees and Amendments) (Scotland) Regulations 2013.

### Purpose and intended effect

#### Background

Statutory charges already exist for services delivered in the fields of:

- controlling the collection of bovine embryos, bovine semen and porcine semen;
- administration of the Poultry Health Scheme
- administration of the National Control Plan for Salmonella
- inspections at Border Inspection Posts.

The fees levied for these services have not been increased for some time resulting in a subsidy for the users and a financial burden to the general taxpayer. Government intervention is therefore necessary to address this by increasing fees to businesses to full cost recovery in line with HM Treasury policy.

In Scotland, as is the case across the rest of GB, these services are delivered by AHVLA, an executive agency of DEFRA, through agency arrangements.

#### Objective

The objective of the proposal is to increase the statutory charges for the specified services delivered by AHVLA, so that the fees more accurately reflect the cost of the services provided.

It is currently the UK and Scottish Government policy that businesses benefiting from a service should pay the full cost of delivering the service rather than looking to the taxpayer to subsidise it. The charges identified, except those relating to the administration of the National Control Plans have not been updated for some time and fall short of reflecting the full cost of service delivery. Increasing the charges will allow for a more equitable distribution of public resources and enables lower public expenditure and borrowing.

The following outline the objective in each area where statutory fees are to be increased:

- **The Bovine Embryo (Collection, Production and Transfer) (Fees) Regulations 1995**

These Regulations implement the Council Directive 89/556/EEC concerning EU trade and as a second tier for domestic trade. Increasing the fees for these services is a more efficient use of public resources by transferring the cost of the service provision from the taxpayer to the direct beneficiaries

- **The Bovine Semen (Scotland) Regulations 1997**

These Regulations set out charges for which a fee is payable i.e the licensing of the collection, processing and storage of bovine semen established under Council Directive 88/407/ EEC (as amended) for trade with EU member states and as a second tier for domestic trade. Increasing the fees for these services is a more efficient use of public resources by transferring the cost of the service provision from the taxpayer to the direct beneficiaries.

- **The Porcine Semen (Fees) (Scotland) Regulations 2007**

These Regulations set out charges for licensing and approving the collection, processing and storage of porcine semen under both Council Directive 90/429/EEC (as amended) for trade with other EU domestic states, read with the Artificial Insemination of Pigs (EEC) Regulations 1992 and under the Artificial Insemination of Pigs (Scotland) Regulations 1964. Current fees do not reflect the true cost to government providing this statutory service resulting in a subsidy for users and a financial cost to the general tax payer. It is necessary to raise the fees to remove subsidy and relieve burden on the general taxpayer by increasing charges to business to full cost recovery.

- **The Poultry Health Scheme (Fees) (Scotland) Regulations 2012**

This scheme facilitates EU trade and exports to third countries without risking the spread of disease which prevent the economic wellbeing of the poultry industry. This scheme was established under Council Directive 2009/158/EC and the Trade in Animals and Related Products Regulations 2012. The intended effect of increasing the charges in this area is to make more efficient use of public resources by transferring the cost of the service provision from the taxpayer to the direct beneficiaries.

- **The Zoonoses and Animal By-Products (Fees) (Scotland) Regulations 2009**

The Salmonella National Control Plan falls under the Regulations. This scheme safeguards public health by reducing the incidence of Salmonella at the farm level in the relevant poultry sectors and throughout the food chain. The purpose of revoking the Zoonoses and Animal By-Products (Fees) (Scotland) Regulations 2009 and updating the fees contained therein is to achieve a full cost recovery charging system for AHVLA in their role of collecting and examining official samples and for the maintenance of the approved private laboratory network (where operator samples are tested according to the requirements of the EU legislation, Regulation

(EC) 2160/2003). This will relieve the burden on the general taxpayer and rectify the current cross sector subsidies that exist, whilst maintaining a competitive sustainable poultry industry

- **Border Inspection Posts**

The controls on live animals imported from third countries are based on EU provisions. Council Directive 91/146/EEC requires that all live animals (other than accompanied pets) are inspected by an official veterinarian on entry into the EU at a Border Inspection Post. Regulation 882/2004 (EC) requires that the costs for carrying out the checks under Council Directive 91/496/EEC are recovered from the importer. These statutory examinations guard against the introduction of animal diseases that could seriously damage our livestock and ecosystems. The objective of this policy is to relieve the burden on the taxpayer of providing this statutory service and, to ensure compliance with EU legislation.

### **Rationale for Government intervention**

Whilst Government already charges businesses for some services, the fees (except those applied to the NCP for Salmonella) have not been revised for some time. This has resulted in a subsidy for users and a financial cost to the general taxpayer. Government intervention is necessary to remove the subsidy and relieve the burden on the general taxpayer. The proposal therefore is to increase the existing fees to business to full cost recovery levels, in line with Government policy. It is worth noting that the current charges do not reflect the cost of delivery and the proposed increases will enable fairer systems to be established. This supports the Scottish Government's strategic objective of supporting a wealthier and fairer business environment in Scotland.

### **Consultation**

**Internal** - The following have been consulted in connection with the development and implementation of this Business Regulatory Impact Assessment (BRIA):

- The Animal Health and Veterinary Laboratories Agency provided advice and figures relating to the proposed charges.
- The Department for Environment and Rural Affairs Agency Relationship Team acted as point of contact and lead on the project and consultation alongside AHVLA and co-ordinating Impact Assessments on a GB Basis.
- DEFRA Zoonoses Policy team provided advice on the charges relating to the Salmonella National Control Plan and produced a GB Impact Assessment.
- DEFRA Veterinary Science Team provided advice on the Charges relating to the Poultry Health Scheme and Artificial Breeding Controls and produced the relevant Impact Assessments on a UK basis.
- DEFRA Animal Health and Global trade and Aquaculture Health Team provided advice on Charges regarding Border Inspection Posts and produced a GB Impact Assessment.

- The Welsh Government, Office of the Chief Veterinary Officer provided comment and advice alongside the other administrations on charging of fees and provided comments on the consultation process.
- Scottish Government Legal Directorate provided legal advice with regard to SI lay out and legal position of Scottish Ministers under the Scotland Act 1998
- Animal Health and Welfare: Disease Prevention Team provided advice on industry contacts for consultation and comments on consultation documents.
- Better Regulation and Industry Engagement Team, Scottish Government, provided advice on preparation of a BRIA.
- Rural Analytical Unit, Scottish Government, provided advice on the charges and likely effects on the Agricultural sector .
- The Legal Aid Team, Scottish Government, provided advice on the implications for the legal aid fund.

### **Public Consultation**

**Informal** – Consultation with industry was carried out as part of the GB Impact Assessment development and outcomes from that were fed into the final consultation document.

**Formal** – Formal Consultation was carried out by DEFRA on behalf of the GB administrations from July 2012 to September 2012. The following Scottish businesses/stakeholder groups were consulted.

Aberdeenshire Council  
 Angus Council  
 Aviagen Ltd  
 BioBest Ltd  
 BioOutsource Ltd  
 BritbreedLtd  
 Edinburgh Zoo  
 Extrordinair Ltd  
 Glasgow Prestwick Freight Centre  
 Fife Council  
 Highland stevedoring Ltd  
 Innovis ltd  
 Midlothian Council  
 NFUS  
 PIC UK  
 SAC  
 Scottish Association of Meat Wholesalers  
 Sea Mammal Research Unit  
 The Scottish Egg Retailers Association  
 UK Shire Services

A total of 4 responses were received from Scottish based groups and we have taken these into account when considering the proposed charges and how they should be implemented. A full analysis of the responses from across the UK will be published on the DEFRA webpages.

## Options

- **Option 0– Do Nothing**

This option would maintain partial recovery of the costs of service provision. The taxpayer would continue to subsidise the service. This is not an acceptable option as it does not deliver full cost recovery but does provide a baseline against which the other options can be assessed.

- **Option 1 – Phased fee increases over two years to achieve full cost recovery by 2014/15.**

Under this option, current fees would be increased to the midpoint between the current charge and full cost recovery on April 2014, and increased to full cost recovery in April 2015. The phasing-in of fee increases would provide businesses with a transitional period to full cost recovery.

- **Option 2– Increases to full cost recovery during 2013/14.**

Under this option, current fees would increase directly to full cost recovery in April 2013, with costs borne by those who benefit rather than being subsidised by taxpayers.

## Sectors and groups affected

As the proposed legislation proposes to update six statutory instruments covering a wide range of animal health sectors those affected are equally wide ranging, from small local businesses and national farming groups to large multinationals and charities.

Charging regulations for importing animals and products through Border Inspection Post is varied, with the majority comprising of individuals and medium sized enterprises. This sector is small in Scotland with only two border inspection posts certified to process live animals. Charities, such as Edinburgh zoo, may also be affected by charges related to inspections at BIPs (and increased CITES charges, although this is a reserved matter).

In the areas of the Poultry Health Scheme and Bovine and Porcine semen only a small number of large and multinational companies operate in Scotland.

## Benefits and Costs

### Option 0 – No Change

**Benefit:** The benefit will go to businesses which will continue to be subsidised by the taxpayer.

**Cost:** This approach increases the financial burden on the taxpayer.

### **Option 1 – Phased introduction of fees**

**Benefit:** The services which are used by businesses will be self-funding by Year 2 following implementation and the costs will be borne by those who benefit.

**Benefit:** This option provides a period of adjustment for businesses to accommodate the increase in fees, spreading the impact on small to medium enterprises.

**Cost:** Phased approach increases financial burden on government assuming incremental increases

### **Option 2 – Immediate Full Cost Recovery**

**Benefit:** The services which are used by businesses will be self-funding by Year 1 following implementation. The costs will be borne by those who stand to benefit

**Cost:** The services which are used by business will be self-funding. The costs will be borne by those who use the service.

### **Scottish Firms Impact Test**

Defra carried out the consultation on behalf of the GB administrations and requested evidence of impacts on small business. Although industry did not specifically answer this question, concerns were raised by farming organisations about the impact of AHVLA charging for staff travel to and from premises, especially to business premises located far away from AHVLA offices; this may be relevant to Scottish businesses situated in rural areas. Following consideration of the responses it has been decided not to charge for travel time although the situation will be kept under review.

Regarding Border Inspection Post charges, a significant proportion of companies in this sector are small to medium size enterprises. Import services are well established and it is not expected that any of the proposed options will entail additional administrative costs or capital investments on business. It is not anticipated that there will be any significant or disproportionate impact of these proposals affecting small firms.

The NCP sector is mainly made up of small to medium enterprises, however it is important to note that EU legislation sets out a risk assessed minimum threshold for each NCP programme and in most cases very small businesses are excluded from the requirements of the legislation.

### **Competition Assessment**

In our view the raising of statutory fees will not negatively impact on competition within the UK as these fees will be introduced on a GB Basis with many of the charges implementing EU Directives. For all areas (with the NCP as an exception) a phased approach is favoured to allow industry to absorb the costs over two years before full cost recovery is achieved.

**Border Inspection Posts** - The increase in charges will be an additional cost to business in this sector. In Scotland the effects will likely be very limited. At the time of data analysis for the GB impact assessments, only one BIP was authorised to process live animal imports from third countries, this BIP is specific to equines only.

Recently Edinburgh Airport was awarded BIP status for third country imports of dogs, cats, ferrets, lagomorphs, amphibians and rodents. Numbers of arriving animals are expected to be small and the importing company responsible for the BIP was consulted as part of the formal consultation process. On this basis, we do not anticipate that implementation of any proposed options will result in any significant restriction in competition in any particular market.

**Poultry Health Scheme** – the increase of charges will be an additional cost to business in this sector. In Scotland only one large multinational company operates under the Poultry Health Scheme and they have indicated that they will be able to absorb the costs without any negative impact.

**Salmonella National Control Plan** – In most cases food business operators within this sector are classified as small to medium enterprises with less than 250 employees. However it is important to recognise EU legislation sets out a risk based assessed minimum threshold for each NCP programme and in most cases very small businesses are excluded from the requirements of the NCP legislation.

**Bovine Embryos and Bovine and Porcine Semen**– The increase in the charges will be an additional cost to business in these sectors and it may not be possible for some businesses to pass the costs to customers, in which case they will have to absorb them themselves. There may be some markets, particularly where profit margins are high, where demand is sufficient and robust enough that customers will pay increased prices. However the sector is currently fragmented with micro, small and medium businesses involved in the trade. Industry will continue to trade and provide a good quality service to their customers. On this basis we do not anticipate that the proposed charges will restrict competition in this sector within Great Britain.

#### **Test run of business forms**

The new instrument will not introduce any statutory business forms.

#### **Legal Aid Impact Test**

The Scottish Government's Legal Aid Team has confirmed that the increase in Statutory fees in the areas listed will have a minimal impact on the Legal Aid Fund.

#### **Enforcement, sanctions and monitoring**

AHVLA will be responsible for collection of fees on behalf of the Scottish Ministers. The Scottish Government will work closely with the UK Government and AHVLA to ensure this legislation is implemented correctly and identify any further improvements and efficiencies that can be made.

There are no sanctions or penalties should these fees not be paid and therefore no offences to go with the regulation. The nature of these services provides benefit to the industry, if the fees were not paid the service would be withdrawn and industry would not receive the benefit. e.g. If fees were not paid at a Border Inspection Post, the goods or animals would be denied entry and likely re-exported or destroyed, at the importers expense. Likewise the certification of animals for artificial breeding purposes provides the proof of disease free status which is important for trade.

### **Implementation and delivery plan**

It is intended that there will be a common implementation date across GB of 24 June 2013.

### **Post-implementation review**

An annual review of charges will be undertaken in conjunction with AHVLA, DEFRA and WG and adjustments to fees introduced as appropriate.

### **Summary and recommendation**

Government already charges businesses for some services provided by the AHVLA; these fees have not been revised (in the majority of cases) for some time and this has resulted in a subsidy for users and a financial cost to the general taxpayer.

Phased increases of fees (Option 1) this recommended for the Poultry Health Scheme, BIPs, Bovine Embryos, Bovine Semen and Porcine Semen charges. This is the only option that provides a period of adjustment allowing industry to absorb the proposed fee increases.

An immediate move to full cost recovery (Option 2) is proposed for the Salmonella National Control Plan. When the NCP charges were first introduced (Scotland 2008) it was agreed that the charges would be phased in over a three year period. This would allow businesses to adjust their financial planning to take account of the new costs and so mitigate as far as possible the expected impact/burden of introducing the costs in one go. By 2010 it was agreed with stakeholders that full cost recovery for the aspects of the NCPs and testing laboratories that are the subject of this BRIA would be in place and that future increases would only be inflationary. However the GB impact assessment established that the current fees do not reflect the true costs to Government of carrying out the official sampling requirements and approved laboratory services



## Summary costs and benefits table

### Estimation of costs to Scottish livestock industries from the implementation of amendments to various statutory fees

1. This section uses existing analysis at the Great Britain (GB) level to produce estimates for the costs that will be incurred by Scottish producers following the implementation of revisions laid out in the following Impact Assessments (IAs):

- Revision of Fees: Amendment of the Porcine Semen (England)(Fees) Regulation 2007 (IA No: Defra 1409).
- Revision of Fees for the Bovine Semen (England) Regulations 2007 (IA No: Defra 1053b).
- Revision of Fees for Bovine Embryo (Collection, Production and Transfer) (Fees) Regulations 1995 (IA No: Defra 1435).
- Review of the Poultry Health Scheme (PHS)(Fees) Regulations 2011 (IA No: Defra 1434).
- Regulation 882/2004 (EC) on Official Controls Performed to Ensure the Verification of Compliance with Feed and Food Law, Animal Health and Animal Welfare Rules – Fees.
- Revision of Fees for Salmonella National Control Programmes & Defra Approved Private Laboratory Network. (IA No: 1445).

Whilst Defra produced a separate costs–benefit analysis for each Regulation Amendment unfortunately they did not include a breakdown for the impact on Scottish livestock industries.

2. Therefore this analysis uses the total cost figures for GB as a whole in order to produce estimates for Scotland. The methodology used to produce these estimates is explained in Annex 1, along with the limitations of these cost estimates.

3. Table 1 details the costs to Scottish Livestock producers for each option (as outlined by Defra) and Regulation in constant prices, whilst table 2 details the Net Present Value (NPV) assuming a Discount Rate of 3.5%. Both tables show the total costs incurred between 2013 and 2022.

4. Annex 2 contains two tables detailing the annual average costs for financial years 2013 – 2022 for each option and each Regulation Fee change.

**Table 1: Total Net Costs Incurred by Scottish Producers, 2013 – 2022, £s, Constant Prices (2009)**

	Option 0 <sup>1</sup> , £	Option 1, £	Option 2, £
Bovine Semen	0	260,000	270,000
Bovine Embryos	0	14,000	14,000
Porcine Semen	0	36,000	36,875
Poultry Health Scheme	0	184,516	191,613
Border Inspection Posts <sup>2</sup>	0	8,958*	9,412*
Salmonella National Control Programmes	0	109,665	110,167

**Table 2: Total Net Costs Incurred by Scottish Producers, 2013 – 2022, £s, Net Present Value Assuming a 3.5% Discount Rate**

	Option 0 <sup>3</sup> , £	Option 1, £	Option 2, £
Bovine Semen	0	221,013	231,013
Bovine Embryos	0	11,834	11,834
Porcine Semen	0	31,430	30,305
Poultry Health Scheme	0	156,989	164,086
Border Inspection Posts <sup>4</sup>	0	7,648*	8,101*
Salmonella National Control Programmes	0	93,929	94,431

5. It should be noted that in some cases a business may incur the additional costs of both the Poultry Health Scheme and the Salmonella NCPs services fee increases.

<sup>1</sup> Option 0 is the 'Do Nothing' option therefore does not result in any additional costs

<sup>2</sup> Scotland's proportion of total imports of live animals in to GB from overseas used here to produce weighting as opposed to non-EU imports only. See Annex 1 for further details.

<sup>3</sup> Option 0 is the 'Do Nothing' option therefore does not result in any additional costs

<sup>4</sup> Scotland's proportion of total imports of live animals in to GB from overseas used here to produce weighting as opposed to non-EU imports only. See Annex 1 for further details.

\* The information for Scottish Equine BIP imports could not be determined specifically due to lack of detailed data, intelligence on import numbers indicates that the figures given may be higher than actual costs.

## Annex 1: Methodology and Assumptions

- To calculate estimates for Scotland, weights were applied to the total cost estimates for GB. In the case of bovine semen and embryos, porcine semen, Salmonella National Control Programmes (NCPs) and the Poultry Health Scheme, the number of facilities located in Scotland as a proportion of the number of facilities in GB was used for the weighting. The figures and resultant weights are outlined below in table 3.

**Table 3: Number of Facilities in GB and Scotland, Plus the Resulting Weights**

	No. in Scotland	No. in GB	Weight Applied to GB Costs
<b>Bovine Semen</b>	1	3	1/3
<b>Bovine Embryos</b>	2	18	2/18
<b>Porcine Semen</b>	1	8	1/8
<b>Poultry Health Scheme</b>	55	217	55/217
<b>Salmonella NCPs</b>	275	3,285	275/3,285

- To use porcine semen as an example, the per annum costs to the porcine semen industry in GB were multiplied by (1/8) to produce estimates for the cost to Scotland.
- The principal assumption made within this approach is that the levels of activity in each facility is equal across GB and therefore each will be subject to covering an equal proportion of the costs.
- A further possible bias relating to bovine semen and embryos is that this type of Company can often operate mobile services which travel from farm-to-farm as well as running a stud. It would be exceedingly difficult to calculate the proportion of these mobile activities that take place in Scotland and so they have been excluded from this analysis.
- For the Border Inspection Posts a different method was employed to apportion the GB costs to Scotland. To calculate a weight for Scotland data was extracted from HM Revenue & Customs (HMRC) Regional Trade Statistics (RTS) on the value of live animal imports in to each GB nation (England, Wales and Scotland) in 2011 from outside the European Union (EU). Total imports of live animals from outside the EU in to GB were valued at £46.3 million in 2011 with £74,000 of this attributable to Scotland.
- The resulting weight utilised to estimate the proportion of GB's costs that will be borne by Scotland was therefore: Total GB cost multiplied by (0.074/46.3).
- The first limitation to note is that HMRC publish data to the 2 digit Standard International Trade Classification code only. The relevant code here being: '00 - Live animals other than animals of division 03'. Division 03 is defined as '03 Fish, Crustaceans, Molluscs & Aq. Inverts & Preps Thereof. Therefore by definition of the codes, the value of any live fish or seafood imports has been excluded from the analysis as there is no facility to separate the live fish and seafood imports from the processed.

- Secondly, the charges for inspections at the border differ depending on the size of consignment (i.e. the number of animals being imported at any one time) and also whether the veterinarian visit is required outside or inside normal working hours. There is no data to such a level of detail available for Scotland so no adjustments for this have been made.
- Finally a proportion of total imports of live animals from outside the EU in to GB cannot be allocated to a geographic area and so are assigned to an 'unknown' region in HMRC's data sets. The value of the unknown region's imports have been excluded from this analysis as by definition they cannot be assigned to a geographical area.

## Annex 2

**Table 4: Costs per Annum of Implementing Fee Amendments, Constant Prices £s, 2013 - 2022**

	Option	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
<b>Bovine Embryos</b>	1	0	1,556	1,556	1,556	1,556	1,556	1,556	1,556	1,556	1,556
	2	0	1,556	1,556	1,556	1,556	1,556	1,556	1,556	1,556	1,556
<b>Bovine Semen</b>	1	8,000	28,000	28,000	28,000	28,000	28,000	28,000	28,000	28,000	28,000
	2	18,000	28,000	28,000	28,000	28,000	28,000	28,000	28,000	28,000	28,000
<b>Porcine Semen</b>	1	0	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000
	2	875	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000
<b>Poultry Health Scheme</b>	1	13,687	19,770	19,770	19,770	19,770	19,770	19,770	19,770	19,770	19,770
	2	6,590	19,770	19,770	19,770	19,770	19,770	19,770	19,770	19,770	19,770
<b>Border Inspection Posts</b>	1	487	941	941	941	941	941	941	941	941	941
	2	941	941	941	941	941	941	941	941	941	941
<b>Salmonella Controls</b>	1	7,953	11,301	11,301	11,301	11,301	11,301	11,301	11,301	11,301	11,301
	2	8,455	11,301	11,301	11,301	11,301	11,301	11,301	11,301	11,301	11,301

**Table 5: Costs per Annum of Implementing Fee Amendments, Net Present Value Assuming 3.5% Discount Rate, £s, 2013 – 2022**

	Option	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
<b>Bovine Embryos</b>	1	0	1,503	1,452	1,403	1,356	1,310	1,265	1,223	1,181	1,141
	2	0	1,503	1,452	1,403	1,356	1,310	1,265	1,223	1,181	1,141
<b>Bovine Semen</b>	1	8,000	27,054	26,138	25,253	24,399	23,576	22,778	22,008	21,263	20,544
	2	18,000	27,054	26,138	25,253	24,399	23,576	22,778	22,008	21,263	20,544
<b>Porcine Semen</b>	1	0	3,865	3,734	3,608	3,486	3,368	3,254	3,144	3,038	2,935
	2	875	3,865	3,734	3,608	3,486	3,368	3,254	3,144	3,038	2,935
<b>Poultry Health Scheme</b>	1	6,590	19,101	18,455	17,830	17,227	16,646	16,083	15,539	15,013	14,505
	2	13,687	19,101	18,455	17,830	17,227	16,646	16,083	15,539	15,013	14,505
<b>Border Inspection Posts</b>	1	487	909	879	849	820	792	766	740	715	691
	2	941	909	879	849	820	792	766	740	715	691
<b>Salmonella Controls</b>	1	7,455	10,919	10,550	10,193	9,848	9,516	9,194	8,883	8,582	8,292
	2	8,455	10,919	10,550	10,193	9,848	9,516	9,194	8,883	8,582	8,292

## **Declaration and publication**

**I have read the impact assessment and I am satisfied that (a) it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and (b) that the benefits justify the costs. I am satisfied that business impact has been assessed with the support of businesses in Scotland.**

**Signed:**

**Date:**

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