EXPLANATORY MEMORANDUM TO

THE ZOONOSES (MONITORING) (ENGLAND) REGULATIONS 2007

2007 No. 2399

1. This explanatory memorandum has been prepared by Department for Environment, Food and Rural Affairs and is laid before Parliament by Command of Her Majesty.

2. Description

2.1. The Zoonoses (Monitoring) (England) Regulations 2007 bring together and enhance Government powers to monitor all zoonoses and zoonotic agents as required under Directive 2003/99/EC. The legislation provides powers to allow Government appointed inspectors to enter premises for the purpose of monitoring.

3. Matters of special interest to the Joint Committee on Statutory Instruments

3.1. None

4. Legislative Background

4.1. The Zoonoses Directive (Directive 2003/99/EC) was developed in response to the opinion on zoonoses adopted on 12 April 2000 by the Scientific Committee on Veterinary Measures relating to public health. That opinion found that the measures in place in the Community at the time were insufficient in that the epidemiological data that member states were collecting on trends and sources of zoonotic a gents were incomplete and not fully comparable.

4.2. To meet the immediate requirements of the Zoonoses Directive each member state must monitor the zoonoses and zoonotic agents listed in Annex I, Part A of the Directive. Monitoring should also cover those listed in Annex I, Part B where warranted by the epidemiological situation, as well as any other zoonotic agent which is considered to be of importance.

4.3. Existing UK legislation (The Animal Health Act 1981, the Zoonoses Order 1989 and the Poultry Breeding Flocks and Hatcheries Order 1993) and current monitoring measures on zoonoses and zoonotic agents have been sufficient to implement the requirements of the first EU Zoonoses Directive (Council Directive 92/117/EEC) which was put in place in 1992. Additional information on trends and sources of zoonotic agents has been collected through the monitoring required in other legislation relating to Mycobacterium bovis in cattle, trichinellosis and rabies. Information has also been captured from routine submissions to government and private veterinary laboratories.

4.4. The aim of the Zoonoses (Monitoring) (England) Regulations 2007 is to bring together into one place Government powers to monitor all zoonoses and zoonotic agents as required under Directive 2003/99/EC.

4.5. This instrument is made under section 2 (2) of the European Communities Act 1972.

4.6. Transposition notes are attached to this Explanatory Memorandum (**at Appendix 1**) that set out how the Zoonoses (Monitoring) (England) Regulations 2007 transpose the provisions of the Zoonoses Directive (2003/99/EC).

5. Extent

5.1. This instrument applies to England. Similar instruments covering Scotland, Wales and Northern Ireland will be published by the devolved administrations.

6. European Convention on Human Rights

6.1. As the instrument is subject to negative resolution procedure and does not amend primary legislation, no statement is required.

7. Policy background

Policy

7.1. The objective of the Zoonoses Directive is to gather information in order to assess the risk to human health from sources of zoonoses and zoonotic agents in the domestic and the wild animal populations. The Directive aims to achieve this objective through enhanced monitoring of the trends and sources of zoonoses and zoonotic agents and related anti-microbial resistance and by ensuring that food-borne disease outbreaks receive proper epidemiological investigation. A further aim of the Zoonoses Directive is to move, when necessary and agreed, towards harmonised monitoring systems, e.g. using the same sampling frame, type of sample and laboratory test methods to provide information on the trends and sources of zoonotic agents in the EU as a whole. This would provide better information on which to assess the need for risk management measures at the European Community level.

7.2. The approach taken by the Zoonoses (Monitoring) (England) Regulations 2007 best matches Government aims for the monitoring of known zoonoses and for finding emerging diseases. It allows the greatest speed of response to a new epidemiological situation, minimises the amount of legislation that needs to be introduced under any situation and provides the best information on which to determine the need for any action for the protection of both animal and public health. It will also provide powers to carry out our share of EU wide surveys as required under EU legislation on the prevention of Zoonoses in primary production (Regulation (EC) No. 2160/2003).

Consultation

7.3. An extensive consultation on the proposed legislation was carried out from August to October 2006. 37 responses were received with a clear majority supporting the proposals. A summary of the key issues raised during the consultation, including Government responses to these issues, will be added to the Defra website where a copy of the consultation package is also available: http://www.defra.gov.uk/animalh/diseases/zoonoses/directive.htm

8. Impact

8.1. A Regulatory Impact Assessment is attached to this memorandum (at Appendix 2) which describes in detail the impact and associated costs related to the proposed legislation

9. Contact

David Collins at the Department of Environment, Food and Rural Affairs. Tel 020 7904 6465 or e-mail: david.p.collins@defra.gsi.gov.uk can answer any queries regarding the instrument.

APPENDIX 1

TRANSPOSITION NOTE

Directive 2003/99/EC of the European Parliament and of the Council on the monitoring of zoonoses and zoonotic agents, amending Council Decision 90/424/EEC and repealing Council Directive 92/117/EEC
(OJ L 325, 12.12.2003, p. 31–40)

The Secretary of State for Environment, Food and Rural Affairs proposes to rely, from 1st October 2007, on the Zoonoses (Monitoring) (England) Regulations 2007, in respect of the transposition of the above Directive within England. A detailed transposition table is set out below.

The Zoonoses (Monitoring) (England) Regulations 2007 ("The Monitoring Regulations") do what is necessary to implement the Directive 2003/99/EC. They do not go beyond the requirements of the Directive.

Please note that:

- responsibility for implementation of the Zoonoses Directive falls to the Secretary of State. Enforcement of The Monitoring Regulations will be the responsibility of local authorities unless directed otherwise by the Secretary of State;
- many of the Articles of the Zoonoses Directive oblige Government to ensure that zoonoses, zoonotic agents and related antimicrobial resistance are properly monitored. These requirements do not need to be transcribed into the Monitoring Regulations. Where this is the case the transposition note states "transposition not required".

Article	Objective	Implementation
1	Subject matter and scope	The objectives of the Directive are achieved by the Monitoring Regulations as well as existing legislation and administrative procedure.
2	Definitions	regulation 2
3	General Obligations	The requirements of the Zoonoses Directive are already transposed through existing administrations and legislation. The Monitoring Regulations anticipates future monitoring of zoonoses and zoonotic agents in response to the epidemiological situation and coordinated surveys without the need for further legislation (such as the specific Statutory Instruments that were required for the harmonised poultry surveys). A specific provision in the Monitoring Regulations to collect, analyse and publish data on zoonoses and zoonotic agents and anti-microbial resistance is not necessary as this is implemented through administrative means (currently through the annual zoonoses report[1]). The powers of entry in the Monitoring Regulations to monitor and investigate zoonotic agents may however be used to enable the collection of data. The requirement to ensure effective and continuous co-operation on the exchange of information is also implemented through

[1] The Report on trends and sources of zoonoses and zoonotic agents in humans, foodstuffs, animals and feedingstuffs.

		administrative means, in particular through agreement between Defra and the FSA, and the remit of the UK Zoonoses Group.
4	General rules on monitoring of zoonoses and zoonotic agents	Regulations 4 and 5 provide inspectors with powers of entry to collect samples to monitor for all the zoonoses covered in Annex I of the Directive.
5	Coordinated monitoring programmes	Subject to the restrictions to powers of entry in regulation 4, the Monitoring Regulations should also ensure that future monitoring and investigation of zoonoses and zoonotic agents can be carried out without the need for further specific legislation
6	Food business operators' duties	For primary production the requirement to preserve isolates and report the results is transposed by regulation 6 of the Monitoring Regulations.
7	Monitoring of Antimicrobial resistance	Regulation 4 of the Monitoring Regulations provides powers to enter premises to determine whether there is evidence of anti-microbial resistance in any zoonotic agent; Regulation 5 provides powers to collect samples for the purposes mentioned in Regulation 4. This includes monitoring for antimicrobial resistance.
8	Epidemiological investigation of food-borne outbreaks	This Article is implemented through existing legislation and administration. The specific legislation which is relevant is set out in the Public Health (Control of Diseases) Act 1984, the Food Safety Act 1990 and associated regulations, which provide the necessary statutory powers for government. Under the 1999 Food Standards Act, the Food Standards Agency has the role of keeping food safety issues under review and it also has powers to carry out investigations. The powers of entry and sampling in the Monitoring Regulations (regulations 4 and 5) could be used to enforce survey work required to support an epidemiological investigation of a food-borne outbreak, in particular at primary production level.
9	Assessment of trends and sources of zoonoses, zoonotic agents and antimicrobial resistance	Specific provisions to implement are not necessary as the requirement to analyse and report this data can continue to be carried out through administrative means; in particular the annual zoonoses report.
10	Community and national reference laboratories	Specific provision is not necessary as National Reference Laboratories are designated through administrative means.
11	Amendments to the Annexes and transitional or implementing measures	Transposition not required.
12	Committee procedure	Transposition not required
13	Consultation of the European Food Safety Authority	Transposition not required
14	Transposition	Since 2004 it has been possible to meet the requirements of the

		Zoonoses Directive through existing legislation and administration. Where additional powers to collect samples were required as part of the harmonised monitoring, specific legislation was brought into force[2]. The Monitoring Regulations provides Government appointed inspectors with powers of entry to monitor for all the zoonoses covered in Annex I of the Directive. Subject to the restrictions to powers of entry in regulation 4, the Monitoring Regulations should also ensure that future monitoring and investigation of zoonoses and zoonotic agents can be carried out without the need for further specific legislation.
15	Repeal	Transposition not required
16	Amendment of Decision 90/424/EEC	Transposition not required
17	Entry into force	Transposition not required
Annex I		Regulation 4(1) (a) covers all zoonoses listed in the annex or any zoonotic agent.
Annex II		Specific provision to transpose is not necessary. Ensuring that monitoring for anti-microbial resistance provides the required information can take place through administrative means.
Annex III		Transposition not required.

[2] The following Statutory Instruments were brought into force to enable the collection of data on Salmonella prevalence required by Regulation 2160/2003:

- The Salmonella in Broiler Flocks (Survey Powers) Regulations 2006.
- The Salmonella in Turkey Flocks and Slaughter Pigs (Survey Powers) (England) Regulations 2006
- The Salmonella in Laying Flocks (Survey Powers) Regulations 2005

APPENDIX 2

REGULATORY IMPACT ASSESSMENT FOR THE ZOONOSES (MONITORING) REGULATIONS 2006

Contents

SECTION 1

SUMMARY OF THE CONSULTATION ISSUES

1. The Zoonoses (Monitoring) Regulations 2006 ("The Monitoring SI") as drafted gives powers of entry and sampling to:

   - Monitor for all recognised zoonoses and zoonotic agents
   - Monitor for newly emerging zoonotic diseases and new strains of zoonotic organisms
   - Monitor for zoonoses and zoonotic agents in all animals including those which are not directly involved in primary production
   - Conduct sampling work on land and premises on which any animal or animal feeding-stuff is or has been present including private dwelling places.

What are the benefits of the Monitoring SI?

2. The Monitoring SI has been drafted to aid the investment that Defra has devoted to the protection of human health through enhanced monitoring and surveillance. The Monitoring SI should provide maximum protection to both animal and human health from any zoonoses or zoonotic agent by facilitating the assessment of risks from new epidemiological situations, allowing the greatest speed of response to emerging zoonotic agents, and minimising the amount of legislation that could be required.

How will the Monitoring SI achieve this?

3. The SI is intended to facilitate a monitoring system that will establish the trends, sources and prevalence of known zoonoses; and enable the detection of emerging or newly emerging zoonotic organisms. It is sometimes necessary to assess the prevalence of an organism in potentially infected animals or their environment to judge whether the organism is zoonotic.

4. This includes circumstances where if a syndrome or organism is identified in animals or humans that could be a zoonosis, it is necessary to collect data on its occurrence in animals, their feed and environment on land which is linked to the outbreak, to assess the threat to human health.

5. Since the outbreak of Foot and Mouth Disease in 2000 Defra has invested in the Veterinary Surveillance Strategy. This is intended to enhance veterinary surveillance and enable emerging risks to be quickly identified to take preventative or remedial action. Improved surveillance can deliver sizeable benefits. The Monitoring SI can be used to support the Veterinary Surveillance Strategy and give government powers to act on surveillance data to carry out sampling and testing to assess the prevalence of a suspected zoonoses or zoonotic agent.

When would the monitoring be initiated?

6. **The monitoring will take place to fulfil the requirements of the Zoonoses Regulation to monitor for specific zoonotic agents. The monitoring could also take place in response to concerns raised from horizon scanning by a committee in the Health Protection Agency. This would require Defra to investigate outbreaks or incidents of new and emerging infectious diseases and syndromes which might be zoonotic. The relevant committee is the Human Animal Infections and Risk Surveillance (HAIRS) group which was set up to carry out risk assessments on zoonoses and zoonotic agents. The powers in the Monitoring SI would only be used for survey work which is necessary to protect human health, not for reasons of academic research.**

What are the likely costs of the Monitoring SI to business?

7. The Monitoring SI does not impose any direct costs on business, apart from the time it might take the owner/operator on an affected premises to allow an inspector onto his/her land to collect samples. If a zoonosis or zoonotic agent is detected in one of these samples the Monitoring SI will not put in place any controls or measures which might affect the work or activities that can be conducted on the premises.

8. We are aware, however, that the wide scope of the Monitoring SI means that there could be indirect costs to business and the RIA has attempted to examine these in detail.

Who is affected by this consultation?

9. In order to help stakeholders determine if this consultation affects them or their members the following list (which is not necessarily exclusive) of those businesses or individuals that we think are most affected by the new rules:

- Organisations, individuals or groups in the meat industry
- Organisations, individuals or groups in primary food production
- Organisations operating and working in markets, assembly centres and collection centres
- Organisations, individuals or groups that work in the veterinary field
- Those enforcing welfare in animals
- Institutes and Associations which involve animals directly or indirectly
- Wildlife advisory groups and Countryside organisations

What decisions have already been taken?

10. Consultees should be aware that we cannot change the basic requirements and principles of the Zoonoses Directive itself. These provisions are directly applicable throughout the EU and some of them are already implemented through existing legislation. They are:

- The requirement to monitor zoonoses and zoonotic agents of human health significance and related anti-microbial resistance.

- The requirements from an epidemiological investigation of food-borne outbreaks.
- The exchange of information related to zoonoses and zoonotic agents.

What are the key issues on which we are seeking views?

11. The RIA focuses on areas where Defra believes the proposed implementation of the Zoonoses Directive should provide the best fit with the specific needs of disease control in the UK and with existing legislation. Whether for instance the Monitoring SI should be limited to primary production or cover other points in the food chain, and how any potential costs to producers can be contained. The RIA includes the following sections:

    - The Rationale for Government intervention.
    - Application and scope.
    - Implementation options (in particular 5).
    - The costs to food producers and other affected business organisations of the implementation options. Views on our estimates of the costs of survey work are especially welcome.
    - Policy costs to government, in particular possible enforcement costs.

Proposed Statutory Instrument

STATUTORY INSTRUMENTS

2006 No. 0000

ANIMALS, ENGLAND

ANIMAL HEALTH

The Zoonoses (Monitoring) Regulations 2006

Made - - - -	*2006*
Laid before Parliament	*2006*
Coming into force - -	*2006*

The Secretary of State is designated ([3]) for the purposes of section 2(2) of the European Communities Act 1972([4]) in relation to measures in the veterinary and phytosanitary fields for the protection of public health.

He makes the following Regulations under the powers conferred by that section:

Title, application and commencement

These Regulations may be cited as the Zoonoses (Monitoring) Regulations 2006; they apply in England and come into force on [ ] 2006.

Interpretation

—(1) In these Regulations—

"the Directive" means Directive 2003/99/EC on the monitoring of zoonoses and zoonotic agents, amending Council Decision 90/424/EEC and repealing Council Directive 92/117/EEC([5]);

"inspector" means any person appointed to be an inspector for the purposes of these Regulations by the Secretary of State or a local authority;

"local authority" means—

(a) in any part of England where there is a unitary authority, that authority,

(b) in any part of England where there is not a unitary authority—

in a metropolitan district, the council of that district,

in a non-metropolitan county, the council of that county,

in each London borough, the council of that borough,

in the City of London, the Common Council;

"unitary authority" means any authority that is the sole principal council for its local government area.

([3]) S.I. 1999/2027.
([4]) 1972 c 68.
([5]) OJ No L 325, 12.12.2003, p 31.

(2) Expressions used in both these Regulations and the Directive have the same meaning in these Regulations as they have in that Directive.

Competent authority

The Secretary of State is the competent authority for the purposes of Articles 3(2), 6(1) and 8 of the Directive in so far as that Directive relates to animals.

Power of entry

—(3) An inspector shall, on producing if so required, some duly authenticated document showing his authority, have a right at all reasonable hours, to enter any premises on which any animal or animal feedingstuff is, or has been, present for the purpose of—

(a) determining whether any zoonosis listed in the Schedule or any zoonotic agent of any such zoonosis exists or has existed there;

(b) determining whether there is evidence of antimicrobial resistance in any such zoonotic agent or in any other agent that presents a threat to public health;

(c) determining, if the epidemiological situation so requires, whether—

any other zoonosis or zoonotic agent exists or has existed there;

there is evidence of antimicrobial resistance in any such zoonotic agent;

any agent of any infection that exists or has existed on those premises is transmissible directly or indirectly from animals to humans;

any agent of any infection that is, or may be, transmissible directly from animals to humans exists on those premises; or

(d) the enforcement of these Regulations.

(4) Paragraph (3) does not apply to admission to any premises used only as a private dwelling-house unless 24 hours' notice of the intended entry has been given to the occupier, or the entry is in accordance with a warrant granted under this regulation.

(5) If a justice of the peace, on sworn information in writing, is satisfied that there are reasonable grounds for entry into any premises for the purposes of the enforcement of these Regulations, and either—

(a) admission has been refused, or a refusal is expected, and (in either case) that notice to apply for a warrant has been given to the occupier;

(b) asking for admission, or the giving of such a notice, would defeat the object of the entry;

(c) the case is one of urgency; or

(d) the premises are unoccupied or the occupier is temporarily absent,

the justice may by warrant signed by him authorise the inspector to enter the premises, if necessary by reasonable force.

(6) A warrant under this section shall continue in force for one month.

(7) If an inspector enters any unoccupied premises he must leave them as effectively secured against unauthorised entry as he found them.

(8) In this regulation "premises" includes any land, any place, any vehicle or trailer, any container, any stall or moveable structure, and any ship or aircraft.

Powers of inspectors

An inspector entering premises under regulation (3) may—

(a) carry out such inquiries, examinations and tests and take such samples (including any animal carcase or any part of an animal carcase, blood, faecal material, feeding stuff, litter or animal products) as he considers necessary;

(b) examine any records in whatever form and take copies or print-outs of those records;

(c) mark, or cause to be marked, for identification purposes, any animal, animal carcase or thing in relation to which any of the powers under sub-paragraphs (a) or (b) have been exercised;

(d) make inquiries of any person;

(e) leave in place any equipment (including any trap) on the premises for the purpose of capturing or monitoring any wild animal (including any arthropod vector) or for detecting any micro-organism;

(f) take with him any person, vehicle or equipment that he considers necessary for the execution of these Regulations; and

(g) take with him any representative of the European Commission.

Examination of isolates

—(9) A food business operator responsible for primary production who examines an isolate, or causes an examination of an isolate to be carried out, in order to detect the presence of any zoonosis or zoonotic agent must—

(a) take all reasonable steps to ensure that the isolate is preserved for a period of 12 months from the date of the examination; and

(b) keep the results of the examination for a period of 12 months from receipt and supply them to the Secretary of State immediately upon demand.

(10) Paragraph (9) does not apply to any sample taken for the purposes of the Poultry Breeding Flocks and Hatcheries Order 1993([6]).

Offences and penalties

—(11) A person commits an offence if he—

(a) administers any treatment to an animal with the intention of disguising any zoonosis or zoonotic agent;

(b) defaces, obliterates or removes any mark applied under regulation (8)(c);

(c) removes or intentionally damages any equipment placed on the premises under regulation (8)(e);

(d) fails to comply with regulation (9);

(e) intentionally obstructs any person acting in the execution of these Regulations;

(f) gives any information that he knows to be false or misleading to any person acting in the execution of these Regulations;

(g) fails, without reasonable excuse—

to give any assistance or information that any person acting in the execution of these Regulations may require him to give; or

to produce any record that any person acting in the execution of these Regulations may require him to produce,

for the performance of that person's functions under these Regulations.

(12) A person guilty of an offence under these Regulations is liable on summary conviction to a fine not exceeding level 5 on the standard scale.

Offences by bodies corporate

—(13) If an offence under these Regulations committed by a body corporate is shown—

(a) to have been committed with the consent or connivance of an officer; or

(b) to be attributable to any neglect on his part,

the officer as well as the body corporate is guilty of the offence and liable to proceeded against and punished accordingly.

(14) If the affairs of a body corporate are managed by its members, paragraph (13) applies in relation to the acts and defaults of a member in connection with his functions of management as if he were a director of the body.

(15) "Officer", in relation to a body corporate, means a director, member of the committee of management, chief executive, manager, secretary or other similar officer of the body, or a person purporting to act in any such capacity.

([6]) S.I. 1993/1898.

Enforcement

—(16) These Regulations shall be enforced by the local authority.

(17) The Secretary of State may direct, in relation to cases of a particular description or a particular case, that any duty imposed on a local authority under paragraph (1) shall be discharged by the Secretary of State and not by the local authority.

Parliamentary Under Secretary of State
2006 Department for Environment, Food and Rural Affairs

SCHEDULE

Regulation (3)(a)

Zoonoses

brucellosis

campylobacteriosis

echinococcosis

listeriosis

salmonellosis

trichinellosis

tuberculosis due to *Mycobacterium bovis*

verotoxigenic *Escherichia coli*

EXPLANATORY NOTE

(This note is not part of these Regulations)

These Regulations provide inspectors with powers of entry to monitor for zoonoses and antimicrobial resistance to zoonotic agents and other agents that pose a threat to public health, as required by Directive 2003/99/EC (on the monitoring of zoonoses and zoonotic agents, amending Council Decision 90/424/EEC and repealing Council Directive 92/117/EEC) (regulation 4). Regulation 0 sets out what inspectors may do on those premises, including take samples, examine records and make inquiries of any person.

Regulation (9) requires food business operators involved in primary production to preserve isolates that have been tested for a zoonosis and to keep the results of those tests and provide them to the Secretary of State on demand.

Regulation (11) creates offences for obstructing an inspector and sets out the applicable penalties. Regulation (16) deals with enforcement.

A Regulatory Impact Assessment and Transposition Note has been prepared and placed in the library of each House of Parliament. Copies can be obtained from Surveillance, Zoonoses and Emerging Issues Division, Department for Environment, Food and Rural Affairs, Area 707, 1A Page Street, London SW1P 4PQ.

SECTION 3

Partial Regulatory Impact Assessment

Title of the legislation and timetable

The Zoonoses (Monitoring) (England) Regulations 2006 (the 'Monitoring Statutory Instrument (SI)'). The **Monitoring** SI is necessary to conduct more effective monitoring and sampling required by an EU Directive which came into force in 2003 and for which we hope to have powers to apply by November 2006.

Legislation implemented by the Monitoring SI

- EU Directive 2003/99/EC on the monitoring of zoonoses and zoonotic agents 'The Zoonoses Directive'

Other legislation referred to in the RIA

- The Zoonoses Regulation 2160/2003 EC the 'The Zoonoses Regulation'
- The Animal Health Act 1981 'The Animal Health Act'
- Poultry Breeding Flocks and Hatcheries Order 1993 'PBFHO 1993'
- The Zoonoses Order 1989
- The Animal by Products Regulations 2005

EU legislation can be viewed at
http://eur-lex.europa.eu/RECH_legislation.do?ihmlang=en

legislation can be viewed at
www.defra.gov.uk

Or printed copies of both EU and UK legislation can be obtained from (or emailed by)

ricky.o.doghor@DEFRA.GSI.GOV.UK **tel: 020 7904 6146**

Definitions

A **zoonosis** is any disease and/or infection which is naturally transmissible directly or indirectly **between** animals and humans.

A **zoonotic** agent means any virus, bacterium, fungus, parasite or other biological entity which is likely to **cause** a zoonoses.

A **National Control Programme (NCP)** is a framework of measures required by the Zoonoses Regulation for the control and monitoring of zoonoses and zoonotic agents which must be implemented by all EU member states.

Purpose and intended effect of the measure

The Objective:

1. The Monitoring SI will give the Secretary of State powers to ensure that monitoring in England will provide reliable information on the trends and sources of zoonotic agents in the country as a whole, and is comparable with that provided in other member states. Separate national legislation will be introduced for each of the four countries of the UK.

2. The Monitoring SI is intended to facilitate a monitoring system that will:

   - establish the trends, sources and prevalence of known zoonoses;
   - provide information on antimicrobial resistance in zoonotic agents and other indicator organisms and
   - enhance the ability to detect emerging or newly emerging zoonotic organisms.

3. It is sometimes necessary to assess the prevalence of infections in animals or in their environment in order to judge whether a newly identified disease or condition in animals is caused by a zoonotic agent, or to see if disease agents found in man are present in animals. This includes circumstances where a syndrome or organism is identified in animals or humans that might be a zoonosis and it is necessary to collect data on its occurrence in animals, their feed and environment, to assess the threat to human health.

4. The provisions of the Monitoring SI as drafted give powers **:**

   - to inspectors appointed by the Secretary of State to take samples and gather information to establish the presence or absence of zoonotic agents (viruses, bacteria, fungi, parasites or other biological entities) likely to cause a zoonosis in line with monitoring required by Zoonoses Directive 2003/99 and to investigate foodborne disease outbreaks;

   - to examine zoonotic bacteria for antimicrobial resistance and other bacteria in so far as they might present a threat to public health;

   - to enforce surveys of baseline prevalence levels of Zoonoses, as required by EU Decisions made under The Zoonoses Regulation, and to enforce other surveys to establish disease freedom.

Rationale for government intervention

5. To continue implementation of the UK's obligations under the Zoonoses Regulation and Directive which were agreed by the Secretary of State in 2003. This legislation was in response to the opinion on zoonoses adopted on 12 April 2000 by the Scientific Committee on Veterinary Measures relating to public health. That opinion found that the measures in place in the Community at the time were insufficient in that the epidemiological data that member states were collecting on trends and sources of zoonotic agents were incomplete and not fully comparable.

6. To increase protection of human health from zoonotic diseases by putting in place a piece of domestic legislation which provides powers to collect and analyse samples to assess the trends and sources of zoonoses and zoonotic agents in the domestic and wild animal population that present a potential threat to human health, without the need for additional legislation.

7. To consolidate and enhance the implementation of future EU and domestic monitoring and sampling legislation (in the short term surveys to establish the prevalence of Salmonella of human health significance) into a single piece of legislation. This will make the monitoring requirements of zoonoses and zoonotic agents in the Zoonoses Directive easier to understand and use for government, enforcing agents, consumers and industry.

EU Directive 2003/99/EC and EU Regulation 2160/2003

8. The objective of the Zoonoses Directive is to gather information in order to assess the risk to human health from sources of zoonoses and zoonotic agents in the domestic and the wild animal populations. The Directive aims to achieve this objective through enhanced monitoring of the trends and sources of zoonoses and zoonotic agents and related anti-microbial resistance and by ensuring that food-borne disease outbreaks receive proper epidemiological investigation. A further aim of the Zoonoses Directive is to move, when necessary and agreed, towards harmonised monitoring systems, e.g. using the same sampling frame, type of sample and laboratory test methods to provide information on the trends and sources of zoonotic agents in the EU as a whole. This would provide better information on which to assess the need for risk management measures at the European Community level.

9. To meet the immediate requirements of the Zoonoses Directive each member state must monitor the zoonoses and zoonotic agents listed in Annex I, Part A of the Directive. Monitoring should also cover those listed in Annex I, Part B where warranted by the epidemiological situation, as well as any other zoonotic agent which is considered to be of importance.

10. As drafted the Monitoring SI fully meets the scope of the Zoonoses Directive. It can be used to enforce enhanced and harmonised monitoring for the collection of relevant and comparable data to identify and characterise hazards, assess exposures and to characterise risks related to zoonoses and zoonotic agents in the domestic and wild animal population. These powers can also be used when sampling is carried out to demonstrate the absence of a disease, or country freedom from a disease e.g. *Brucella* melitensis.

11. The Zoonoses Regulation deals with the management of risk of zoonotic infections in animals and is closely allied to the Directive. It requires that member states implement control plans for the reduction of specified zoonoses (currently salmonella) at farm level in certain animal species (currently domestic fowl, turkeys and pigs).

12. The first stage in the process is to carry out surveys to establish the baseline level of salmonella in the animal species at the farm level. The surveys are carried out using the same procedures and methods so that the level can be determined uniformly in each member state and in the Community as a whole.

13. Surveys have been completed for Salmonella in holdings with layer flocks of *Gallus gallus* and a similar one in holdings with broiler flocks is on-going. Powers to take the samples for these surveys has had to be provided for with specific limited Statutory Instruments. The following 12 month surveys starting in the dates shown are scheduled to take place in the next three years and will be enforced by the powers of entry and sampling in the Monitoring SI.

    - Turkeys – October 2006 (NCP is expected in place by January 2009)
    - Fattening pigs – October 2006 (NCP expected in place by January 2008)
    - Breeding pigs – October 2007 (NCP expected in place by January 2010)

14. On the basis of the data provided by the baseline surveys, the European Commission set each member state a target to reduce the pathogen or infectious agent within a set timescale. Each member state is then required to develop a National Control Programme (NCP), including details of how this target will be achieved and verified, for approval by the European Commission. The Monitoring SI will provide the legal basis for government to monitor implementation of these NCPs.

Background

Current legislation and the need for enhanced powers

15. Existing UK legislation (The Animal Health Act 1981, Zoonoses Order 1989 and PBFHO 1993) and current monitoring measures on zoonoses and zoonotic agents have been sufficient to implement the requirements of the first EU Zoonoses Directive (92/117) which was put in place in 1992. Additional information on trends and sources of zoonotic agents is available through the monitoring required in other legislation relating to Mycobacterium bovis in cattle, trichinellosis and rabies. Information is also captured from routine submissions to government and private veterinary laboratories. However, this legislation cannot continue to meet the enhanced monitoring requirements of the new Zoonoses Directive or enforce the forthcoming surveys in turkeys and pigs required by the Zoonoses Regulation.

16. Where there is no specific current legislation relating to the zoonotic agent, any monitoring to detect trends and sources often takes place on a voluntary basis. Although participation by owners of animals on a voluntary basis can be successful it can also introduce an element of bias, as the data may not be based on a representative selection of operators, making the results less robust and useful. Therefore it was decided that the Salmonella surveys in laying and broiler flocks would be best enforced under specific SIs. The ability to make statistically random selections of holdings for sampling will facilitate the harmonised monitoring foreseen in the Zoonoses Directive.

17. Furthermore, the Zoonoses Directive is intended to anticipate changes in the epidemiological situation of newly emerging zoonotic organisms which might require coordinated monitoring programmes. It is also intended to facilitate the detection of emerging zoonotic organisms.

18. The Monitoring SI would provide the basis for setting up a monitoring programme quickly to assess the situation and provide information required by the risk managers in the veterinary and public health authorities. In conclusion although current legislation meets some of the requirements of the Zoonoses Directive and Regulation it now

needs to be updated to provide for improvements that are required to existing monitoring and data collection systems for the protection of human health**.**

Devolution

19. It is intended that the Monitoring SI should apply to England only. Separate national legislation will be introduced for each of the four countries of the UK.

Application and scope

20. The Monitoring SI will apply new EU legislation in England and it will be necessary to make it under the powers of section 2 (2) of the European Communities Act 1972.

21. The Monitoring SI is concerned with monitoring and sampling to determine if the zoonosis or zoonotic agent is present or absent. It does not establish controls to reduce the zoonoses and zoonotic agents. Separate legislation to implement the control plans required by the Zoonoses Regulation will be covered by a separate Regulatory Impact Assessment (RIA). Any control plans for zoonotic agents not covered in the Zoonoses Regulation would be the subject for further full consultations.

Risk Assessment

22. The immediate risk is that the failure to bring the Monitoring SI into force could result in the absence of powers of entry and sampling for the forthcoming surveys in the pig and turkey sectors, required by the Zoonoses Regulation. Without these powers the required range of holdings may not be included in the survey with the resultant risk that the results are not representative of the UK situation and the UK would fail to meet its requirements under European Commission decisions regarding the design of the surveys.

23. There would also be the long term risk that England will not have in place comprehensive enforcement powers for the enhanced monitoring systems described by the Zoonoses Directive to facilitate the collection of data on the trends and sources of zoonotic diseases and new strains of zoonotic organisms.

24. The implementation options described below all come with attendant risks which this RIA attempts to quantify as far as possible. All options has been discussed within Defra, the Devolved Administrations (DAs) and representatives from industry (including the National Farmers Union, British Poultry Council and British Egg Industry Council).

Options

Option 1 – do nothing

Option 2 – introduce specific legislation each time powers of entry and sampling are required to monitor for a zoonosis and zoonotic agent and related anti-microbial resistance.

Option 3 – conduct the sampling and monitoring required by the Zoonoses Directive and Regulation on a voluntary basis.

Option 4 – put in place an SI which will provide powers to enter premises and take samples to establish the prevalence of zoonoses and zoonotic agents and anti-microbial resistance in animals kept for food production and their environment.

Option 5 – put in place an SI which will provide powers to enter premises and take samples to establish the prevalence of zoonoses and zoonotic agents and anti-microbial resistance in all animals and their environment.

Option 1 – do nothing.

25. Failure to comply with the monitoring and sampling required by the Zoonoses Directive and Regulation would be a threat to public health and a breach of Community obligations. Without consistent survey procedure and methods in all Member States, data on EU levels of zoonotic disease would remain incomplete and the setting of EU reduction targets for disease prevalence would not be on a sound basis. This is not considered to be a feasible option.

Option 2 – introduce specific legislation each time powers of entry and sampling are required to monitor for a zoonosis and zoonotic agent and related anti-microbial resistance.

26. If this option were adopted Defra would bring in separate legislation for each survey carried out under the Zoonoses Regulation. Further legislation would be produced to comply with the Zoonoses Directive each time there was a change in the epidemiological situation and powers of entry were required to carry out sampling in order to monitor a sector or activity.

27. In the short term this approach could meet our European Community obligations. It would however increase legislative and administrative costs beyond those of the other options (apart from option 1) since implementing legislation would have to be laid before Parliament each time a Decision was published by the European Commission. Requiring specific monitoring action. The Secretary of State would not have powers to conduct survey work until legislation implementing the respective Decisions came into force. The publication dates of EU Decisions cannot always be easily harmonised with Parliamentary schedules.

28. Specific legislation would also be required for the monitoring of the organisms mentioned in Annex I of the Zoonoses Directive if warranted by a change in the epidemiological situation. As well as creating high administrative costs to Government, this option would go against Government aims for deregulation and simplification of regulatory burdens on industry, where possible. These are explained further in the costs section of this RIA.

Option 3 – conduct the sampling and monitoring required by the Zoonoses Directive and Regulation on a voluntary basis.

29. Defra's approach to the implementation of the monitoring requirements of the Zoonoses Directive has been extensively discussed with industry representatives from the poultry and pig sectors. They recognise that to meet the new monitoring requirements government needs to be able to collect accurate data which is comparable with that from other member states. Industry representatives have encouraged their members to co-operate with survey work required by the Zoonoses Regulation in the poultry and pig sectors and have provided practical assistance at the farm level. If such support could guarantee the co-operation of poultry operators in

fully meeting the wider monitoring requirements of the Zoonoses Directive then Defra would fulfil its European Community obligations without the costs of drafting and implementing legislation. However, while voluntary support can be relied upon from the majority of operators, there may remain a number of operators who will not participate in monitoring programmes on a voluntary basis. In such cases monitoring programmes may need to be backed by enforcing legislation**.**

30. To assess the risks of zoonoses or zoonotic agents at Community level the Zoonoses Directive and Regulation provide for programmes which set specific criteria for selection of holdings. Experience indicates that participation in surveys – even those currently required by the Zoonoses Regulation which have the support of industry representatives - tends to be more dependable and immediate when backed by legislation. In order to demonstrate that the results of a monitoring programme is based on a representative selection of farms it is important that the selection of premises is not confined only to holdings where operators are willing to volunteer. There is also a danger that conducting survey work on a voluntary basis could also unfairly burden those who are prepared to co-operate.

Option 4 – put in place an SI which will provide powers to enter premises and take samples to establish the prevalence of zoonoses and zoonotic agents and anti-microbial resistance in animals kept for food production and their environment.

31. This option will provide powers of entry and sampling to monitor animals kept for food production for all zoonoses and zoonotic agents and related anti-microbial resistance transmitted through the animals kept for food production. This could be used to enforce the forthcoming surveys of turkeys, fattening and breeding pigs required by the Zoonoses Regulation. It would also allow appropriate monitoring of other zoonoses and zoonotic agents and improve the information on trends and sources of zoonotic agents.

32. Option 4 would not give Defra powers of entry and sampling which cover the companion or wild animal populations. This would not put the government in breach of its community obligations as the Zoonoses Directive is not intended currently to begin a continuous programme directed at all species. If it were necessary to test these animals to investigate the spread of disease additional legislation could be brought into force.

Option 5 – put in place an SI which will provide powers to enter premises and take samples to establish the prevalence of zoonoses and zoonotic agents and anti-microbial resistance in all animals and their environment.

33. The Monitoring SI as drafted provides the powers described in this option.

34. Option 5 provides powers of entry and sampling for all the activities described in option 4 but these powers are extended to all animals (including wild and companion animals). This makes the powers in the Monitoring SI as wide ranging and anticipatory as the provisions of the Zoonoses Directive. Although priority would be given to those zoonoses and species which are currently most likely to contribute to the prevalence of disease in humans, it would also facilitate monitoring in response to emerging or newly emerging zoonotic diseases and strains of zoonotic organisms. If, for instance, there was a requirement to monitor for a specific zoonosis in the wild animal population Defra would have the powers in place without the need for additional legislation. An informed risk assessment, based on the results of the monitoring, could then be made

to determine whether the zoonosis posed a significant hazard to human health and whether risk management measures should therefore be considered.

35. In developing this RIA we have sought to identify as much flexibility in legislation as possible to lighten any regulatory burden on affected businesses and government bodies. Widening the scope of the Monitoring SI to all animals as opposed to bringing in specific legislation in every case could be perceived as an unnecessary regulatory burden. However the SI, as drafted, aims to provide Government with wide ranging powers in order to monitor zoonoses and zoonotic agents effectively while at the same time ensuring that such powers are used only where necessary.

36. The Monitoring SI is not intended to initiate comprehensive monitoring programmes to assess the levels of zoonotic organisms in all animals. Its purpose is to facilitate the collection of data on their occurrence to determine trends and sources as required by the epidemiological situation.

Pets and Wild Animals

37. With new strains of disease we cannot predict which animal species will be infected. Decisions over whether a monitoring programme is necessary in order to make a risk assessment on emerging organisms which might transmit disease are usually taken according to recommendations from the bodies established to protect human health. There may be circumstances in which it would be necessary to collect samples from pets and their environment. A situation may arise where government could identify the presence of zoonotic agents, or likely zoonotic agents, but needed to assess whether a group of animals was a significant potential source of infection for humans. To assess the significance of a newly introduced organism, or new strain of a known organism, it is important to be able to establish its prevalence. Examples of zoonoses which may be identified in pets and wild animals include:

- Corynebacterium bacteria, which causes diphtheria, and which has been identified in domestic dogs.
- Bovine Tuberculosis in areas where there is suspicion that the disease might be present in wild animals and might be transmitting disease to neighbouring cattle. Without the co-operation of landowners veterinary inspectors may be unable to collect samples to make an assessment of the situation.

Private premises

38. With commercially farmed animals, zoonotic disease is a business risk and has implications for the food chain. Private dwellings and land, as well as pets and other animals which are not involved in food production are lower risk with regard to the transmission of zoonoses to the wider public. There are also human rights considerations involved in establishing powers of entry into private dwellings and land not used for food production. Therefore the Monitoring SI applies stricter standards for enforcing the powers of entry on to private premises. It is proposed that a notice should be given or that a warrant should be obtained from a Justice of the Peace.

39. Legislation such as the Animal Health Act 1981, the Zoonoses Order 1989 and the Animal By-Products Order 1995 (updated 2005) have demonstrated that legislation which gives wide ranging powers to government can be used proportionately and without over-committing resources to enforcement.

Benefits of the Options

Option 1 – do nothing

40. No benefits would occur if the do-nothing option was followed

Option 2 – introduce specific legislation each time powers of entry and sampling are required to monitor for a zoonosis and zoonotic agent and related anti-microbial resistance.

41. This option would enforce the upcoming baseline surveys of Salmonella prevalence in pigs and turkeys, required by the Zoonoses Regulation, in a straightforward way. This would result in benefits of better assessments of animal health significance of Salmonella incidence and enhanced assessments of risk to public health posed by Salmonella. The survey work is a useful means of collecting information about the production system and biosecurity measures. This is of great value to Defra industry and the consumer in identifying factors associated with the presence of infections. If necessary further legislation could be brought in to enforce co-ordinated monitoring required by the Zoonoses Directive. This can be used to make informed risk assessments and support the overall objective of improving public health by monitoring for levels of foodborne illness in the UK.

Option 3 – conduct the sampling and monitoring required by the Zoonoses Directive and Regulation on a voluntary basis.

42. This approach would demonstrate to industry Defra's intention of ensuring that regulatory burdens are minimised and possibly encourage producers to co-operate with monitoring for zoonoses and zoonotic agents through incentives as opposed to sanctions.

43. Key benefits for many producers would include: less regulation; the enhanced reputation of their industry; and the opportunity to tackle biosecurity problems with advice and support of government before infections are spread further along the food chain. If this was successful it could encourage industry to share responsibility with Defra for future Salmonella monitoring of zoonotic agents.

44. If the surveys could be carried out on a voluntary basis there would be an administrative saving to Defra of drafting, consulting and implementing the monitoring requirements of the Zoonoses Directive and Regulation. Furthermore if survey work took place on an agreed voluntary basis for monitoring exercises poultry and pig holdings could be selected from farm census data which is usually not available for voluntary research projects. Establishing the location of holdings proved to be time-consuming for the baseline survey of Salmonella in broiler flocks. Possible costs to the enforcement agencies would also be avoided, although these cannot be quantified without knowing what level of enforcement action would be required.

Option 4 – put in place an SI which will provide powers to enter premises and take samples to establish the prevalence of zoonoses and zoonotic agents and anti-microbial resistance in animals kept for food production and their environment.

45. This option would produce an over-arching SI which would provide powers of entry and sampling for zoonoses and zoonotic agents in animals used for primary production. It would provide for the enhanced monitoring and harmonisation foreseen in the Zoonoses Directive for primary production which is needed to take account of the increasingly complex intra-community trade patterns between food producers and the tightly structured nature of the food chain. There are also clear administrative benefits and savings to Defra to be gained with an over-arching SI.

46. This option would allow greater speed of response and hence greater protection of animal and public health from zoonoses and zoonotic agents compared to options 1 to 3. Administrative time would be saved as new legislation would not be needed each time a new stage is reached or sector has to be covered in the implementation of the Zoonoses Directive and Regulation. The immediate benefits would be upcoming baseline surveys of Salmonella prevalence in pigs and turkeys, required by the Zoonoses Regulation, could be enforced successfully. This would also benefit food producers by ensuring that these surveys take place on schedule and in parallel with those conducted in other member states.

Option 5 – put in place an SI which will provide powers to enter premises and take samples to establish the prevalence of zoonoses and zoonotic agents and anti-microbial resistance in all animals and their environment.

47. Option 5 will bring the same immediate benefits of option 4 in enforcing forthcoming survey work for turkeys and pigs, with the associated animal and public health benefits. There would be benefits in the longer term from having a consolidated piece of legislation in place which is sufficiently flexible to allow monitoring of other zoonoses and zoonotic agents found in animals and species (in particular pets and wild animals) as required by changes in the epidemiological situation. This monitoring could be in response to an emergency situation and/or if the EU Commission decided that harmonised monitoring was required for these agents.

48. This will benefit the consumer:

- by ensuring that measures taken to control zoonoses and zoonotic agents can be informed by accurate data which in an emergency situation can be quickly acquired by Government without the need for additional legislation.

- by ensuring that the government has in reserve powers of entry and sampling which can be used to demonstrate the absence of a disease as well as the presence and avoid resources being wasted on control of a zoonosis or zoonotic agent which is not of human health significance.

49. It would also benefit industry and government by:

- ensuring that monitoring can take place at relevant stages of production without the delays that can be caused by producing additional legislation.

- ensuring rapid response to any emerging epidemiological situation, whether it arises from domestic, companion or wild animal populations.

- preventing any lack of clarity or confusion as to entry and sampling powers which might lead to non-compliance on farms.

Veterinary Surveillance Strategy

50. The wide scope of the Monitoring SI will compliment the investment that Defra has put into the Veterinary Surveillance Strategy to enhance veterinary surveillance after the outbreak of Foot and Mouth Disease in 2000. This should enable government to integrate monitoring measures that can quickly identify sectors and regions, including those not involved in primary production, where there is heightened risk and enable the development of preventative or remedial action.

51. Data and activity from many sources (such as private veterinary surgeons or animal owners) is being integrated through the RADAR system (Rapid Analysis and Detection of Animal related Risk) to help analyse and track emerging threats more rapidly.

Health Protection Agency

52. The Monitoring SI as drafted would also support the activities of the Health Protection Agency which aims to identify and assess outbreaks of new and emerging infectious diseases. Monitoring programmes may be initiated in response to concerns raised from horizon scanning by the Human Animal Infections and Risk Surveillance (HAIRS) group which was set up by the HPA to carry out risk assessments on zoonoses and zoonotic agents and emerging organisms that might transmit disease. This group has developed a detailed method to indicate where government should take action in the event of a new agent being discovered that might be a significant risk to human health.

53. The monitoring will take place to fulfil the requirements of the Zoonoses Regulation to monitor for specific zoonotic agents. The monitoring could also take place in response to concerns raised from horizon scanning by a committee in the Health Protection Agency. This would require Defra to investigate outbreaks or incidents of new and emerging infectious diseases and syndromes which might be zoonotic. The relevant committee is the Human Animal Infections and Risk Surveillance (HAIRS) group which was set up to carry out risk assessments on zoonoses and zoonotic agents. The powers in the Monitoring SI would only be used for survey work which is necessary to protect human health, not for reasons of academic research.

54. In summary widening the monitoring to all animals allows the greatest speed of response to a change in the epidemiological situation, minimises the amount of legislation that needs to be introduced under any situation and provides the maximum protection to both animal and public health from any zoonoses or zoonotic agent.

55. The inclusion of animals which are not directly involved in primary production also makes this the option which offers the most significant compensatory simplification measures to industry, as explained below.

Costs

Administrative Costs

56. The costs of the survey work, including collection and analysis of samples, enabled by the Monitoring SI in the pig and poultry sectors over the next four years will be met by

government. These estimates were provided by Defra, the SVS and Veterinary Laboratories Agency. They have been calculated to take into account as many factors as possible but will also be influenced by some factors which are difficult to predict such as the distribution of farms and the requirements of survey protocols, which have yet to be determined at an EU level.

Policy Costs to industry and other affected organisations

57. Substantial costs to industry from the SI's provisions are not anticipated as it does not put in place any cost recovery powers from the sectors and groups selected for the collection and testing of samples. Costs to industry are summarised below, based on previous surveys. If government decided that a cost recovery mechanism should be put in place (for instance for the collection and testing of samples) it would be covered by a separate consultation and separate legislation.

58. In October 2001, when the Zoonoses Directive and Zoonoses Regulation were at the proposal stage, a RIA was produced. At that stage UK industry did not identify any costs associated with the sampling and monitoring required by the Zoonoses Regulation to establish the targets for the reduction of salmonella. Subsequently the concerns of industry representatives have been with the possible costs associated with sampling, including official controls required by Decisions made under the Zoonoses Regulation to demonstrate that the target established by the Commission has been met. Indirectly the Monitoring SI may have a financial impact as it will inform programmes which protect public and animal health against zoonoses.

59. The burden this legislation will place on operators or owners selected for survey work will be limited to the time taken to allow SVS or other agency officials onto an operators land or premises to take samples and provide relevant information and assistance. These obligations would vary according to the data that has to be captured. In previous surveys this has included data on:

- Records of movements and contacts with other animals
- Identification marks
- Size of flocks or herds
- Details of vaccination and medication

60. **In previous surveys the assistance that might be required from an operator or owner has included:**

- Informing the Animal Health Officer of a suitable date for sampling
- Entry to the premises and location of the animals
- Selecting and gathering animals or carcasses for sampling (possibly through numbers on ear tags or slap marks)
- Provisions for health and safety and biosecurity.

Scope of the Monitoring SI

61. The Monitoring SI as drafted encompasses a wide range of groups and sectors who could be compelled to allow an agent of the competent authority access to their land, premises or animal(s) for the collection of samples. This, combined with unforeseen

epidemiological situations, makes costs difficult to quantify for the purposes of the RIA. It is possible, however, to form an approximate estimate taking into account the experience from other surveys. In the following tables, previous surveys have informed estimated times and costs based on the average number of animals sampled on a typical holding.

62. Some of these samples are collected on a monthly basis (for instance those taken under the Poultry Breeding Flocks and Hatcheries Order 1993). Others are taken when required for disease control (for instance blood from sampling horses). Since survey work conducted under the Monitoring SI is also likely to be on an ad-hoc basis it is difficult describe the costs in terms of an annual cost for industry.

Table 1

Taking environmental samples from laying and broiler flocks and completing questionnaires	4 hours
Taking samples from breeding flocks under PBFHO 1993	1 hour
Testing sheep for brucellosis under the Brucellosis Order 2000:	
Brucella abortus - To take blood samples from a herd of cattle can take a considerable period of time (sometimes a day) and additional help and handling equipment may be required.	
Brucella melitensis - up to twenty sheep or goats are sampled which can take up to 2 hours and sometimes extra help is needed.	
Testing horses for notifiable diseases (blood sampling 5-10 horses)	2 hours
Testing of pig carcasses for ZAP Salmonella programme	4 hours

63. If there was a need to capture wild animals for testing it is likely to require much more of the owner's time per animal than for farm animals, as wild animals are not accustomed to being caught and handled and may be dispersed over a large area. The cost of this time for gathering should be added to the time needed for actually taking samples. This cost would only be incurred under option 5.

Specific comments from industry and other interested parties (for instance those with experience of testing wild animals) on this part of the RIA are welcome.

Form Filling and other administrative costs to industry.

64. The survey work which will be enforced by the Monitoring SI does not oblige operators or land owners to complete any paper-work. Regulation 7 of the Monitoring SI does, however oblige them to provide information to enable an officer of the Secretary of State, to take a meaningful sample. For primary producers this includes details on the animals on a holding and the production type. In the survey work for the Zoonoses

Regulation this information is included in a compulsory questionnaire. Experience of a survey conducted last year on Salmonella prevalence in laying flocks indicates that it takes on average 20 minutes to provide this information.

65. For the forthcoming survey work in turkeys and pigs the details of the questionnaires will depend on the requirements of Decisions taken by the European Commission and related technical specifications. It is reasonable to assume that it will take a similar length of time for the operator to provide information for the compulsory questionnaires.

66. The cost of the administration time needed as well as the time required for taking samples is summarised in Table 2.

Specific comments from industry on this part of the RIA are welcome.

Industry Costs Summary

67. The examples listed in Table 1 above can be used to estimate the total industry costs of a single survey. However, where surveys take place on an ad-hoc basis, industry costs are far more variable and dependent on a positive or negative sample results, and so have not been estimated here as examples of possible industry costs.

Table 2

	No. holdings/ abattoirs sampled	No. visits per year	Time needed per visit (hours - sample & qu'aire)	Value of time (£ / hour)	Industry cost per survey
Breeding Flocks					£135,000
Parent flocks	415	6	4	£8.50	£85,000
Grandparent flocks	123	12	4	£8.50	£50,000
Turkeys (forthcoming)	373	1	4	£8.50	£13,000
Costs at abattoirs					
Pig carcases (Salmonella)	25	3	4	£7.00	£2,000

68. These costs are based on the assumption that one worker either on the holding or at abattoir would be able to carry out the sampling and questionnaire work. Therefore, the cost of extra staff where required for sampling has not been estimated.

Costs of the different options

69. When considering the costs of the options as set out below it should be understood that the costs of sampling and monitoring will stay the same to the affected sectors regardless of which implementation option is selected (apart from option 1). Defra is obliged to carry out the standardised prevalence surveys to establish the baseline of the specified zoonotic agent in the different food animal species covered by the Zoonoses Regulation and if required by the epidemiological situation the monitoring required under the Zoonoses Directive. As explained below the quantifiable

differences in costs are chiefly concerned with the time spent drafting and consulting on legislation.

Option 1 – do nothing

70. This is not considered to be a feasible option as taking no action to implement the Zoonoses Directive would result in the UK being in breach of its EU obligations. Infraction proceedings taken by the European Commission against the UK for non-compliance would result in fines.

71. Costs to industry of doing nothing could include adverse affect on trade if it was considered that the UK was not monitoring zoonotic infections appropriately. Costs to public and animal health could also result from the lack of an adequate monitoring system for zoonoses beyond the scope of current legislation, allowing infections to spread because reliable information was not available to enable risk management measures to be introduced.

Option 2 – introduce specific legislation each time powers of entry and sampling are required to monitor for a zoonosis and zoonotic agent and related anti-microbial resistance.

72. Bringing in separate pieces of legislation for each of the forthcoming surveys of turkeys and pigs would increase Defra administrative costs by around 50% to £7,000 per survey. The introduction of other surveys under the Zoonoses Regulation and Directive would result in further administrative costs being incurred for the drafting and implementation of future SIs. It would also demand more Parliamentary time.

73. Further legislation would be required if due to a change in the epidemiological situation harmonised monitoring were required for other sectors and animals. As stated earlier such an approach could prove to be unwieldy both for industry and government, and would introduce further administrative costs.

74. Industry would also face higher costs under this option compared with other options. With the possibility of multiple pieces of legislation being introduced at different times, industry would face higher costs in terms of the length of time it took to familiarise themselves with new legislation. It could also lead to a lack of clarity as to the requirements in force. Given the importance of harmonised monitoring, it is not in the economic interests of most producers for the government to delay survey work aimed at assessing risks to human health. However these potential costs to industry are difficult to quantify.

Option 3 – conduct the sampling and monitoring required by the Zoonoses Directive and Regulation on a voluntary basis.

75. The low cost of a voluntary system must be considered against the costs to government and industry associated with the risk of a) failing to carry out the baseline surveys of Salmonella prevalence according the specifications set out in European Commission decisions and b) failure to implement monitoring required by the Zoonoses Directive. This option could also lead to substantial administrative costs (possibly higher than in option 2) if legislation had to be put in place quickly to ensure compliance.

76. This option presents the same potential costs to animal and public health as option 1 and greater potential cost to animal and public health than the other options if the results of monitoring provided misleading information. Where resistance to survey work was encountered Defra would work with industry representatives to encourage their members to co-operate. If this was not entirely successful and levels of resistance to survey work threatened the validity of the results Defra could then bring in specific legislation. This would however increase the cost of this option to that comparable with options 2, 4 and 5 as the full cost of drafting and implementing an SI for animal disease monitoring is estimated at £5,000([7]).

Option 4 – put in place an SI which will provide powers to enter premises and take samples to establish the prevalence of zoonoses and zoonotic agents and anti-microbial resistance in animals kept for food production and their environment.

77. If adopted this option would avoid future Defra administrative costs likely to be incurred by bringing in legislation each time a Decision is made under the Zoonoses Regulation enabling survey work. If a situation arose where monitoring for other zoonoses or zoonotic agents among the domestic or wild animal populations was required under the Zoonoses Directive, then the cost of drafting and implementing would increase as a second piece of legislation would be needed.

78. The cost to industry of familiarising itself with legislation would be a one-off cost, rather than a continuing cost as under option 2 and without the risk of a possibly changing legislative situation as under option 3. It will however be necessary to bring in additional legislation if monitoring is required for companion or wild animals.

Option 5 – put in place an SI which will provide powers to enter premises and take samples to establish the prevalence of zoonoses and zoonotic agents and anti-microbial resistance in all animals and their environment.

79. The administrative costs of drafting an SI which encompasses these provisions is the same as that for option 4 as implementing the SI under this option would involve a one-off cost without risk of further costs should an unforeseen epidemiological situation arise.

80. The major potential costs as well as benefits of this option may be significant but difficult to quantify. There are potentially significant benefits in making the powers of the Monitoring SI comprehensive enough to respond to unexpected epidemiological developments in any of the domestic, companion or wild animal populations. However, the costs of the associated survey work that might be required cannot be quantified at this stage as, by definition, the exact content of that work is currently unknown. This cost would not however be solely associated with this option. If required for the protection of human health the costs associated with the survey work would have to be met regardless of the legislation used to enforce it.

Compensatory simplification measures

81. Options 4 and 5 both ensure that Defra will not implement the monitoring requirements of the Directive in a piecemeal fashion i.e. adding legislation to the statute books at

[7] This estimate is based on Defra figures for staff costs of drafting a Statutory Instrument to enforce the sampling required for the Broiler survey in 2005.

each stage with an increasing cumulative impact on administrative effectiveness and on the industry, as under option 3. Instead monitoring legislation for England will be contained in a single and straightforward piece of legislation. This should prevent any lack of clarity or confusion regarding powers of entry and sampling which could lead to difficulties in monitoring farms where there may be practices which could harm the safety (and reputation) of the industry.

82. We are, however, aware of the need to avoid, where possible, any overlap between the powers in the Monitoring SI and existing Orders such as the Zoonoses Order 1989 and Poultry Breeding Flocks and Hatcheries Order 1993. Amendment or even revocation of all or part of these Orders will be considered as necessary.

Sustainable Development

83. In social and economic terms a contribution to the overall objective of improving public health is intended to result. It should assist in identifying changing trends and risks to public health in line with Defra's Strategic Priority on sustainable farming and food, part of which is putting in place systems to reduce risks of animal diseases, and being ready to control them when they occur. There are significant environmental impacts identified as arising from the legislation.

Business Sectors and groups affected

Food businesses

84. As drafted the Monitoring SI gives government the powers of entry and sampling described in option 5. However in the immediate future the Monitoring SI will have most impact on primary producers in the pig and turkey sectors where survey work will be conducted to establish a baseline prevalence for Salmonella in holdings across the EU. This will involve the collection (or supervision of the collection) of samples either from the animals or from the environment of the animal to determine the presence or absence of a zoonotic agent and its characteristics by an agent of the Competent Authority. Powers may be used, in particular, when checks are made to ensure that operators comply with the requirements of the control plans for their sectors and when official control sampling is carried out.

85. In England, there are 33,412 holdings with any poultry, of which 5,538 are primary poultry holdings and 1,572 are holding with turkeys. There are 2,161 pig holdings in England([8]). Abattoir owners could also be affected as this is often a convenient place to sample animals of certain ages as they are collected together in the one place. Sampling at the abattoir is also effective in assessing the risks to the food chain. This must be qualified with the understanding that over the next four years surveys to establish baseline prevalence levels of Salmonella in the pigs and turkeys will only cover holdings which meet the sizes and business profile specified in the technical specifications provided for in the relevant European Commission decisions. For turkeys the survey work applies to holdings with over 500 birds.

86. The scope of the NCPs are also intended to exclude producers who are unlikely to make a significant contribution to the average prevalence of zoonoses in the Community's animal population. In the case of breeding flocks of domestic fowl

[8] June Agricultural Census 2004 and 2005

(*Gallus gallus)* the NCP applies to holdings with at least 250 birds. The NCP will not apply to producers which directly supply small quantities of products to the final consumer. This is discussed in more detail below as part of the Small Firm's Impact Test.

Other groups and business sectors affected.

87. In the longer term the proposed SI may have a wider impact. As stated earlier the Zoonoses Directive requires member states to have monitoring systems in place which facilitate the detection of emerging or newly emerging zoonotic diseases and new strains of zoonotic organisms as well as those currently posing the greatest risk to human health. The Monitoring SI gives government entry and sampling powers which will anticipate changes to the epidemiological situation to determine the presence or absence of a zoonotic agent. If, for example, a new agent occurred in a sector not associated with primary production (for instance in the wild animal population on land belonging to the National Trust), then in order to assess the risk of the infection to the public it might be necessary to gather epidemiological data in the animal or its environment. In this case, the owners of land where the animals were present would be affected, as entry onto the land could be necessary in order to collect the appropriate samples of the wild animal species being monitored.

88. Consequently the proposed SI would give government powers of entry and sampling on all holdings or areas on which animals or animal feedingstuffs are, or have been kept. This would include animals kept for commercial and leisure purposes (for instance stables and zoological collections) as well as food production and companion animals. It would include sampling at abattoirs, or other convenient locations for sampling to determine the presence or absence of zoonotic agents in the live animal. The powers of the Monitoring SI could also be applied to areas on which wild animals are present including land which belonged to the national parks or country estates or forestry companies and which was designated as a protected area. For the purposes of the Monitoring SI a wild animal would be defined as a member of any species that was resident in or a visitor to English territory in a wild state.

Issues of equity and fairness

89. The Monitoring SI does not introduce any questions of equity or fairness.

Consultation with small business: the Small Firms' Impact Test

90. The Small Business Service has been included in this consultation process. It should be noted that the NCPs and the monitoring required to enforce them will not apply to farms which supply small quantities of primary products to the final consumer.

91. For the purpose of RIAs, all businesses having fewer than 250 full time equivalent employees are considered small businesses. By this definition, virtually all farms in England are small firms and only 0.2% of farms are not small firms. In the poultry industry specifically, approximately 60-70% of broiler production is under the complete control of the processing companies, with production farms owned by the company and managed and run by company employees. Most of the remaining 30-40% of producers are individual growers supplying these same producers under contract (UFAW Farm Handbook 4th Edition). Whilst the processing companies will generally

have more than 250 full time equivalent employees, virtually all of the contracted producers will fall within the small firms definition. The costs and benefits to industry are set out above under each option.

92. Currently, only one reduction target has been set under the Zoonoses Regulation which applies only to adult breeding flocks of *Gallus gallus* of 250 birds or over. In the breeding fowl industry, 97% of the 5.1 million birds are kept on just 0.4% of the total number of all holdings with breeding fowl in England. On holdings where there are at least 250 breeding fowl, there are on average 11,800 birds per holding, compared to an average of just 12 birds per holding where there are less than 250 breeding fowl([9]).

93. In exploring the options for the Monitoring SI, a primary consideration has been to help industry to continue to conduct normal business while minimising zoonotic disease risk. Options 4 and 5 do not present significant impacts on small firms.

Competition Assessment

Domestic Competition

94. The Monitoring SI covers all holdings from which data on the prevalence of zoonoses and zoonotic agents might need to be collected for disease control. It has been checked against the competition filter and since it covers holdings regardless of their size or production type the costs of this SI would not affect some firms more substantially than others. The preferred policy option for an over-arching SI is not expected to have a negative effect on competition in any primary production sector or lead to higher start up costs for primary producers.

95. As already mentioned there will be some costs that are difficult to quantify for producers selected for sampling, although the method of sampling ensures that this falls evenly across industry and so will not impact negatively on competition. However it is likely that there would be implications for individual primary producers on whose holdings zoonoses or zoonotic agents have been detected and confirmed.

International Competition

96. Currently, there is only one reduction target in place, which relates to Salmonella in breeding flocks of domestic fowl (*Gallus gallus*), as described above. As the UK has already achieved this target of 1% incidence in the adult breeding flock population due to existing monitoring and disease reducing schemes, it is in a favourable competitive position compared to other EU countries where Salmonella incidence exceeds this target. This Monitoring SI would ensure that data on zoonoses and zoonotic agents is comparable across the EU, helping UK producers to benefit from such competitive advantages.

Enforcement and Sanctions

97. The Monitoring SI will be enforced by Local Authorities. The Secretary of State may however in relation to a case of a particular description or circumstance direct that enforcement activities are discharged by Defra. Since this SI is intended to cover all the monitoring requirements of the Zoonoses Directive that are not already provided for

[9] June 2005 Agricultural and Horticultural Survey (England)

in English legislation it is very difficult to estimate the precise costs to enforcement agencies. However Defra has not experienced any serious non-compliance problems with the survey work for layers and broilers (domestic fowl) and it is not envisaged that the powers set out in the Monitoring SI should suddenly lead to large scale resistance from farmers.

98. If there was large-scale resistance to survey work enforced by the SI then Defra would initially work with industry in order to encourage their members to participate voluntarily. Discussions are on-going between Defra and local authorities regarding specific responsibilities for enforcing the Monitoring SI.

Please would enforcement authorities inform us of any costs/burdens associated with these proposals.

Implementation and delivery plan

99. The consultation period for the Monitoring SI began on 31 July 2006 and will end on 27 October 2006. This section will then be completed.

Post implementation review

100. The Zoonoses Directive includes an amendment clause under which certain provisions could be changed to take account of technical and scientific progress. This will be considered when National Control Plans are reviewed.

Summary costs and benefits

101. The following table summarises costs and benefits under each option. In each case, the costs and benefits are compared to the costs of Option 1 (do nothing), where government and industry costs of sample collection and testing would remain unchanged from that which takes place under current legislation. Similarly, the benefits to animal health and public health from monitoring zoonoses and zoonotic agents presented are those over and above any benefits related to current legislation.

102. The following are the key benefits identified in the various options presented in this RIA:

- improved zoonoses monitoring, with associated animal and public health benefits;
- data is collected on a basis consistent with other Member States so that EU levels of disease can be known and targeted;
- monitoring can be quickly and effectively implemented in response to an unexpected epidemiological event.

103. Table 3 below shows that option 5 results in the greatest increase in all benefits, with the least risk to those benefits being realised. Option 4 produces the same benefits but is limited to zoonoses and zoonotic agents in farmed animals. Options 2 and 3 could potentially yield the same benefits but with risks attached. Under option 2, the

risk is that monitoring could not be introduced as rapidly in response to an unforeseen epidemiological event as new legislation would need to be drafted first. It is possible that such a delay in starting monitoring could also risk animal and public health. Under option 3, the risk is that voluntary schemes might not be credible with the EU and would not result in comparable data being produced. There could also be a further risk in relation to animal and public health if farms with poor biosecurity could bypass the voluntary system.

Table 3

Benefits				
	Government Benefits	Industry Benefits	Animal Health Benefits	Public Health Benefits
	Quick and effective response	EU export markets from comparable data	Monitoring of zoonotic disease	Monitoring & quick response
Option 1	None	None	None	None
Option 2	None – time needed for new legislation	EU markets maintained - risk of legislative delay	Improved monitoring of zoonotic disease - risk of legislative delay	Improved – risk of delay
Option 3	None – depends on new voluntary process or new legislation	EU markets maintained but risk that voluntary system not credible	Improved monitoring of zoonotic disease - risk under voluntary system	Improved – risk under voluntary system
Option 4	Yes – if in relation to farmed animals	EU markets maintained and promoted	Improved monitoring of zoonotic disease in farmed animals	Improved in relation to farmed animals
Option 5	Yes – from any animal	EU markets maintained and promoted	Improved monitoring of zoonotic disease in any animal population	Improved in relation to all animals

104. Table 4 shows that sample and testing costs are the same for both industry and Government under all the options. Option 2 presents the greatest costs associated with introducing legislation, to both Government and industry. Options 4 and 5 have the same costs to Government of drafting legislation and the same costs to industry of familiarising themselves with legislation. However, options 2, 3 and 4 are all subject to the risk that further legislation could have to be introduced in the future, in the event that monitoring is required among non-farmed animal populations.

Table 4

Costs					
	Government Costs			Industry Costs	
	Cost of visit and sample collection (p.a.)*	Cost of lab testing samples (p.a.)**	Cost of drafting legislation	Time for familiarising with legislation	Cost of time & cooperation for sample collection***
Option 1	Zero	Zero	Zero	Zero	Zero

Option 2	£10,000	£147,000	£7,000 – plus unknown future legislation	Half an hour per piece of legislation	£135,000
Option 3	£10,000	£147,000	Zero – risk that legislation might be needed	Half an hour for understanding volunteering guidelines	£135,000
Option 4	£10,000	£147,000	£5,000 – risk of further legislation	Half an hour – one off	£135,000
Option 5	£10,000	£147,000	£5,000	Half an hour – one off	£135,000

*cost of visit and sample collection is estimated from costs under the current Poultry Breeding Flocks and Hatcheries Order 1993. Based on cost of £28.20 per visit and sample collection at 360 visits per year and no cost-sharing with industry.

** cost of lab sampling is estimated from costs under the current Poultry Breeding Flocks and Hatcheries Order 1993. Based on cost of £37.10 for lab tests of samples per supply cost with 415 parent flocks, visited six times per year, plus 123 grandparent flocks, visited 12 times a year.

*** cost of time is based on sampling that takes place for laying flocks under the current Poultry Breeding Flocks and Hatcheries Order 1993. Based on cost of £34.00 per visit with 415 parent flocks, visited six times per year, plus 123 grandparent flocks, visited 12 times a year. Description of costs to industry for different species and diseases is laid out above.

Appendix 1

List of consultees

Consultation on the Zoonoses (Monitoring) Regulations 2006

- ADAS
- Advisory Committee on Organic Standards (ACOS)
- Advocates For Animals
- Agricultural Industries Confederation
- Agricultural Policy Research Committee
- AM Walkup Ltd
- Ancona Club
- Anglia Quality Meat Association
- Anglian Poultry Processors Action Group
- Animal Aid
- Animal Breeding Company Ltd
- Animal Health Distributors UK
- Animal Health Trust
- Animal Procedures Committee
- Animal Transport Association
- ASDA Group plc
- Asian Hardfeather Club
- Association of British Abattoir Operators
- Association of Chief Police Officers (ACPO)
- Association of Convenience Stores
- Association of Independent Meat Suppliers (AIMS)
- Association of Livestock Exporters
- Association of Meat Inspectors
- Association of National Parks
- Association of Port Health Authorities
- Association of Show & Agricultural Organisations
- Association of Veterinarians in Industry
- Assured British Meat
- Assured British Pigs
- Assured Chicken Production
- Assured Food Standards
- Aviagen Group
- Aviornis UK
- AWSELVA

- BAA plc
- Babcock Hubbard ISA Ltd
- Banovallum Veterinary Group
- Barker Gotelee Solicitors
- Bernard Matthews Foods Ltd
- BG Group (The Environment Office)
- BHP Biliton Plc
- Biocides & Pesticides Assessment Unit
- Biotechnology and Biological Sciences Research Council
- Bird Life International
- Bird Show UK
- Blackpool Zoo

- Blackwell UK Limited
- Board of Deputies of British Jews
- Border Convention
- Born Free Foundation
- Brent Lodge Park
- British and Irish Federation of Zoos and Aquariums
- British Association for Shooting and Conservation
- British Association of Feed Supplement & Additive Manufacturers Ltd
- British Association of Leisure Parks, Piers & Attractions (BALPPA)
- British Association of Nature Conservationists
- British Bird Council
- British Cattle Veterinary Association
- British Chambers of Commerce
- British Chicken Association Ltd
- British Chicken Information Centre
- British Deer Society
- British Domesticated Ostrich Association
- British Ecological Society
- British Egg Association
- British Egg Industry Council
- British Egg Information Service (BEIS)
- British Egg Products Association (BEPA)
- British Entomological and Natural History Society
- British Field Sports Society
- British Free Range Egg Producers Association
- British Frozen Food Federation (BFFF)
- British Fur Trade Association
- British Goose Producers Association
- British Herpetological Society
- British Leather Confederation
- British Livestock Genetics Consortium
- British Meat Manufacturers Association
- British Meat Processors' Association (BMPA)
- British Medical Association
- British Ornithologists' Union
- British Pest Control Association
- British Pig Executive
- British Ports Association
- British Poultry Council (BPC)
- British Retail Consortium (BRC)
- British Road Federation Ltd
- British Shooting Sports Council
- British Small Animal Veterinary Association (BSAVA)
- British Society of Animal Science
- British Trust for Ornithology
- British Turkey Information Service
- British United Turkeys Ltd
- British Veterinary Association
- British Veterinary Poultry Association
- British Veterinary Zoological Society
- British Waterfowl Association
- British Wild Boar Association
- British Wildlife Rehabilitation Council

- BSAVA
- Budgerigar Society
- Buff Orpington Club
- Buxted Fresh Poultry Products Ltd

- CABI Bioscience
- Cage and Aviary Birds
- Call Duck Association
- Cambac Pig Sales Ltd
- Campaign to Protect Rural England
- Campden & Chorleywood FRA
- Central Association of Agricultural Valuers
- CGU Insurance
- Chartered Institute Of Environmental Health
- Cheale Meats Ltd
- Cherry Valley Farms Ltd
- Cheshire Smallholders Association
- Chicken Rescue Centre
- Chilled Food Association (CFA)
- Circus Proprietors Association
- Cobb Europe Limited
- Cold Storage & Distribution Federation
- Commerce and Employment Department
- Commercial Farmers Group
- Companion Animal Welfare Council
- Compassion in World Farming (CIWF)
- Confederation of British Industry
- Consumers Association
- Cookery and Food Association
- Co-operative Wholesale Services
- Co-operative Women’s Guild
- COPAS
- Copas Traditional Turkeys Limited
- Cornish Guild of Smallholders
- Corporation of London
- Cottage Farm
- Country Fresh Pullets Limited
- Country Land & Business Association
- Countryside Agency
- Countryside Alliance
- Craft Guild of Chefs
- Cranberry's Foods Ltd
- Cranswick Plc (Cranswick Mill Ltd)

- DAISY
- Dalgety Livestock
- DARDNI
- Dartmoor Hawking School of Falconry
- De Montfort University
- Deans Foods Limited
- Deer Initiative and Deer Management Qualification
- Defence Animal Centre
- Derbyshire Redcap Breeders Club

- Devon & Cornwall Constabulary
- Devon Association of Smallholders
- Direct Laboratories Ltd
- Director Political & International BFC
- Domestic Fowl Trust
- Domestic Waterfowl Club of Great Britain
- Domino UK Ltd
- Dorking Breeders' Club
- Duck Sector Group
- Dudley and West Midlands Zoological Society

- Earthkind
- East Kent Smallholders at Canterbury
- East Riding Smallholders Society
- Economic & Social Committee
- Elm Farm Research Centre
- Emergency Planning Society
- England Forestry and Industry Partnerships (EFIP)
- Eurogroup for Animal Welfare
- European Research into Consumer Affairs

- FACE – UK Countryside Alliance
- Falconry UK Ltd
- Family Farmers Association
- Fancy Fowl
- Farm Animal Care Trust
- Farm Animal Welfare Council (FAWC)
- Farm Animal Welfare Network (FAWN)
- Farm Retail Association (FARMA)
- Farmcare
- Farmer’s Club
- Farming and Wildlife Advisory Group
- Fauna and Flora International
- Federation of Agricultural Co-operatives UK Ltd
- Federation of City Farms & Community Gardens
- Federation of Environmental Trade Associations (FETA)
- Federation of Small Businesses
- Federation of Wholesale Distributors
- Fenland Goatkeepers and Smallholders Club
- Food and Drink Federation
- Food Animal Initiative
- Food Commission
- Food from Britain
- Food Policy Update
- Food Standards Agency (FSA)
- Foodaware
- Foreign Bird Association
- Foreign Bird Federation
- Forestry Commission in the New Forest
- Forum of Private Business
- Frank Bird Poultry Limited
- Freedom Foods
- Freight Transport Association

- Fresh From Cornwall Ltd
- Friends of the Earth
- Future Health

- G Rowley
- Game Conservancy Trust
- Game Farmers Association
- Gamekeepers Cottage
- Genus plc
- Genzyme Ltd
- George Adams and Sons (Holdings) Ltd
- Goat Veterinary Society
- Goose Club
- Goose Producers Association
- Grain and Feed Trade Association
- Grampian
- Greenpeace
- Gridfeed-Thornber Ltd
- Groundwork UK

- Haemolytic Uraemic Syndrome Help (HUSH)
- Halal Food Authority
- Hampshire College of Agriculture
- Harper Adams - Agricultural University
- Hatchers Poultry
- Hawk and Owl Trust
- Hawk Conservancy
- Health Protection Agency
- Heather Preen Trust
- Herpetological Conservation Trust
- Hertfordshire and Essex Smallholding and Garden Society
- HM Customs & Excise
- Hollypark Organics
- Horniman Museum & Gardens
- Horticultural Trades Association
- Hospital Caterers Association
- Hotel Catering and International Management Association
- Humane Slaughter Association
- Humane Urban Wildlife Deterrence
- Humberside police
- Hy-line UK Ltd

- IAF Representative
- Iceland Frozen Food Ltd
- IHBC
- Imams and Mosques Council (UK)
- Independent Bird Register
- Independent Farmers' Group
- Indian Runner Duck Association
- Industry Nature Conservation Association
- Infection Control Nurses Association
- Institute for Animal Health
- Institute of Animal Technology

- Institute of Ecology and Environmental Management
- Institute of Environmental Management and Assessment
- Institute of Environmental Sciences
- Institute of Food Research
- Institute of Food Science and Technology
- Institute of Grocery Distribution (IGD)
- Institute of Trading Standards
- Institute of Zoology
- Institution of the Environmental Health Officers
- International Agriculture & Technology Centre
- International Fund for Animal Welfare
- International Meat Trade Association
- International Ornithological Association
- International Poultry Service Limited
- International Wild Waterfowl Association
- International Zoo Veterinary Group
- Intervet UK Ltd
- IPC Media
- ISA Poultry Services
- Islamic Cultural Centre
- Islamic Foundation
- Ixworth Breeders Club

- J Bibby Agriculture
- J C Carter
- JCA Group (Veterinary Publishing)
- John Bowler Agricultural Holdings
- John Innes Centre
- Joice & Hill Poultry Ltd
- Joint Consultative Council For Meat Trade
- Joint Hospitality Industry Congress
- Joint Nature Conservation Committee
- JSR Healthbred Ltd

- Kent Police HQ
- Kent Rural Interests Group
- Kent Smallholders Club
- Korean National Livestock Institute

- LACORS
- Landscape Institute
- LANTRA Trust
- Law Society
- League Against Cruel Sports
- Leatherhead Food Research Association
- Licensed Animal Slaughterers and Salvage Association (LASSA)
- Linking Environment And Farming (LEAF)
- Lincolnshire Smallholding & Self Sufficiency Club
- Livestock Auctioneers' Association
- Livestock Traders Association of G.B.
- Local Authority Caterers Association
- Local Government Association
- Lohmann GB

- LSHTM

- McDonald Restaurants Ltd
- Magistrates Association
- Maple Leaf Chicks Limited
- Marks and Spencer
- Masterbreeders Limited
- McKey Food Service Ltd
- Meat & Livestock Commission (MLC)
- Meat Hygiene Service (MHS)
- Meat Industry Liaison Group
- Meat Training Council
- Medical Research Council
- Merial Animal Health Ltd
- Midland Grain Warehouse
- Ministry of Agriculture, Forestry and Fisheries
- Mobile & Outside Caterers Association (Great Britain) Ltd
- Moorland Association
- Muslim Council of Britain (MCB)

- National Agricultural Centre
- National Animal Disease Information Service (NADIS)
- National Animal Health & Welfare Panel
- National Animal Sanctuary Alliance
- National Association of Agricultural Contractors
- National Association of Breeders' Services
- National Association of British Market Authorities
- National Association of Catering Butchers
- National Association of Local Councils
- National Association of Poultry Suppliers
- National Association of Women's Clubs
- National Birds of Prey Centre
- National Centre for Animal Statistics
- National Centre for Poultry
- National Consumer Council
- National Consumer Federation
- National Council for Aviculture
- National Council of Schechita Board (NCSB)
- National Council of Women (GB)
- National Egg Marketing Association
- National Environmental Research Council
- National Farm Attractions Network
- National Farmers Union (NFU)
- National Federation of City Farms
- National Federation of Consumers Groups
- National Federation of Meat & Food Traders
- National Federation of Poultry Clubs
- National Federation of Women's Institutes
- National Federation of Young Farmers' Clubs
- National Flying Club
- National Food Alliance
- National Game Dealers Association
- National Gamekeepers Organisation

- National Institute of Poultry Husbandry
- National Office of Animal Health (NOAH)
- National Pest Technicians Association
- National Pig Association
- National Pigeon Association
- National Trust
- Natural Resource Institute
- Natural Sausage Casings Association
- NAWAD
- New Forest Committee
- Newmarket Foods
- Newquip Limited
- Norfolk Smallholders Training Group
- North Kent Animal Welfare Group
- North of England Homing Union
- North Yorkshire Smallholders Society

- O'Kane Poultry NI
- Organic Farmers and Growers Ltd
- Organic Food Federation
- Organic Resource Agency
- Orpington Breeders' Club

- P D Hook (Hatcheries) Ltd
- Parliamentary Group for Animal Welfare
- Passports for Pets
- Patchett Engineering Limited
- People's Dispensary for Sick Animals
- Pet Care Trust
- Pet Food Manufacturers Association
- Phoenix Livestock Ltd
- Pig Veterinary Society
- Porcofram Marketing
- Poultec Training Limited
- Poultry Club of Great Britain
- Poultry First Limited
- Poultry Health Services
- Premier Breeders International
- Premier Genetics
- Primary Diets LTD
- Provimi Limited (Animal Nutrition and Health)
- Provision Trade Federation
- Public Health Laboratory

- Quaker Concern for Animals
- Quality Meat and Livestock Alliance
- Quarry Products Association

- Rare Breeds International
- Rare Breeds Survival Trust
- Rare Poultry Society
- Road Haulage Association
- Royal Agricultural College

- Royal Agricultural Society of England
- Royal College of Veterinary Surgeons (RCVS)
- Royal Parks
- Royal Pigeon Racing Association/Foreign Bird Association
- Royal Society for the Promotion of Health (RSPH)
- Royal Society for the Protection of Birds
- Royal Society of Wildlife Trusts
- Royal Veterinary College
- RSPCA
- Rural Stress Information Network
- Rural Women's Network
- RWE Innogy Plc

- S Borsberry
- S E Kneill
- SAFE
- Safewings Wildlife Conservation Projects
- Sainsburys
- Scots Dumpy Breeders' Club
- SEERAD
- Seghers Hybrid Ltd
- Sheep Veterinary Society
- Shropshire Smallholders Group
- Silliker Ltd
- Small Abattoir Federation (SAFe)
- Small and Family Farms Alliance
- Small Business Service
- Small Farms Association
- Smallholder Magazine
- Smallholders Association Somerset
- Soil Association
- Solihull Health Authority
- Somerfield
- SongBird Survival
- South West Regional Development Agency
- Spar
- SPR Poultry Limited
- Staffordshire College of Agriculture Rodbaston
- Standing Conference On Countryside Sports
- State Veterinary Service (SVS)
- States of Guernsey
- States of Jersey
- Suffolk Smallholders Society
- Summers Poultry Products Ltd
- Sun Valley Foods
- Sustain: The alliance for better food and farming
- Sustainable Development Commission
- Swalec

- Tenant Farmers Association
- Tesco Stores Limited
- Tim Brigstoke Associates
- Tom Barron Limited

- Townswomen's Guilds
- Traditional Farm Fresh Turkey Association
- Trading Standards Institute
- Trades Union Congress
- Turkey Club UK
- Turnstone Campaigns

- UK Association of Fishmeal Manufacturers
- UK Association of Frozen Food Producers (UKAFFP)
- UK Egg Producers Retail Association
- UK Major Ports Group Ltd
- UK Renderers Association
- UMIST
- Union of Muslim Organisations of UK and Eire
- Union of Shop, Distributive and Allied Workers
- UNISON
- Unit Head PH62 Emerging Infections Biotech & CID
- United Synagogue Kashrut Board
- Universities Federation for Animal Welfare
- University of Bristol
- University of Cambridge
- University of Leeds
- University of Liverpool
- University of Nottingham
- University of Reading
- Utility Poultry Breeders Association

- Vegetarian Economy and Green Agriculture (VEGA)
- Vegetarian International Voice for Animals (VIVA)
- Verderers of the New Forest
- Veterinary Laboratories Agency
- Veterinary Public Health Association

- W J Watkins and Sons Ltd
- W1 Country Market Ltd
- Waitrose
- Walsall Metropolitan Borough Council
- Walters Group
- Waste Food Feeders Association
- Waveney Wildfowl
- WCVA
- Welcome Trust
- Welsh Assembly Government
- West County Eggs
- Welsummer Club
- Wernlas Collection
- Which?
- White and Baxter Veterinary Surgeons
- Wildfowl and Wetlands Trust
- Wildlife and Countryside Link
- Wildlife Concern
- Wildlife Trusts
- Wiltshire Smallholders Group

- Wm Morrison plc
- Women’s Farming Union
- Women’s Food and Farming Union
- Women's National Commission
- Woodland Trust
- World Animal Net
- World Conservation Monitoring Centre
- World Owl Trust
- World Pheasant Association
- World Poultry Science Association (WPSA)
- World Society for the Protection of Animals (WSPA)
- WRC – NSE
- WWF-UK
- Wye Foundation

- Yorkshire Agricultural Society
- Yorkwold Pig Production

- Zoological Society of London