



National Sheep Association
The Sheep Centre, Malvern
Worcestershire, WR13 6PH
Tel: 01684 892661
Fax: 01684 892663
enquiries@nationalsheep.org.uk
www.nationalsheep.org.uk

Dear Deputy First Minister,

Following our letter regarding Welsh Government BTV policy from 1st July – when an all-England restricted zone is to be introduced – I write to oppose your decision for Wales to not become a restricted zone with England.

I understand the difficulty of this decision and the risks the disease poses to our members, but those risks can be managed by farmers through vaccination and the current policy as it stands is not proportionate to those risks. By creating a barrier between Wales and neighbouring England you expose the livestock industry to damaging levels of disruption tantamount to that of a notifiable disease incursion, in the absence of actual disease. You have opted for state-directed self-harm, over vector-borne harm, which can be managed at cost to the industry.

Your ambition to keep Wales BTV-free is commendable on principle, but the practical and economic impacts of your policy on farms and allied trades have been ignored. In the absence of any official impact assessment you might well have relied on the messaging of industry bodies. I agree with your position to back vaccination as of the practical steps farmers can take against BTV-3, but I fear the overall message that Wales is closing the border to protect its livestock will result in many assuming there is no need to vaccinate.

Our primary concerns centre on the impact on livestock trade and prices. Your decision will have a damaging impact on the viability of several auction marts both sides of the border. Vendors will have far fewer buyers competing for store and breeding sheep, resulting in a two-tier trade and devaluing stock. Your decision could have a major impact on the viability of several important livestock market businesses.

Last year's main NSA ram sale turned over more than £2.25 million. Around 40% of vendors came from England and Scotland. The decision as it stands would have considerable disruption on this sale. Any movement of breeding ewes into Wales from England is also threatened due to the prohibitive costs of testing at £40 a sheep for a Pirbright PCR test. Your decision threatens trading activity at these autumn sales and incomes for English markets and English farmers at a time of cost inflation. This is not as prohibitive for cattle, which are worth more than ten times more.

The NSA has the following criticisms of your actions:

- **Confusing messages on vaccination** Farmers may see vaccines as an unnecessary expense if they believe the virus can be kept out of Wales. An unintended impact of your communications on this policy are to dissuade producers from vaccinating.

Chief Executive: Phil Stocker
A company limited by Guarantee. Registered in England No. 03301833.
Registered charity in England and Wales (249255) and in Scotland (SC042853)



your business your future

National Sheep Association is an organisation which represents the views and interests of sheep producers throughout the UK.
NSA is funded by its membership of sheep farmers and its activities involve it in every aspect of the sheep industry.



- **No impact assessment** NSA understands how challenging this decision is, but without a detailed impact assessment in which the pros and cons are evaluated, we fear the Welsh Government is poorly placed to make decisions.
- **Wales is not the low countries** In yesterday's (17 June) Senedd plenary session you outlined stark losses to Dutch farmers of 100 million euros. The topography of Wales and the presence of three licensable vaccines mean the Welsh flock faces a very different challenge to that of the 2024 Dutch flock. Furthermore, costs are complex and can include administration and vaccination, as well as stock losses and disposal.
- **Misleading comments on keeping BTV at bay** You have gone on the record several times claiming the Welsh Government has kept BTV-3 at bay. This is somewhat disingenuous. The truth is that controls managed by Defra and APHA and business constraints and pain felt by farmers within RZs have kept the virus from more livestock dense areas of Britain. We hope virus incursion is lower from the continent due to high vaccination numbers and that the main reservoir of virus within the UK is in newborn calves.

Our position is as follows:

- We would like to see Wales becoming part of a large RZ with England, with freedom of movements across the border and reliance on vaccination.
- In the absence of the above, we support any efforts to facilitate animals sold for slaughter to be sold in markets along the Welsh border.
- In the absence of Wales becoming part of an RZ with England, we would like to see Welsh Government allowing vaccinated animals, following a period to allow immune response, to move without a pre-movement test.
- We expect to see WG playing its part in promoting vaccination, ensuring adequate vaccine stocks and placing greater reliance on vaccination as the means to protect Welsh livestock
- We would encourage initiatives to create 'vaccination firebreaks' along the border to reduce risks of midge transmission.
- BTV is a notifiable disease, and we would like to see as few barriers created for farmers to report suspect cases. Policies should encourage notification.

Yours,



Phil Stocker, Chief Executive, National Sheep Association