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14th January 2016

Animal Disease Control & Trade Policy Department of Agriculture and Rural Development Room 714 Dundonald House Belfast BT4 3SD

## The Scrapie (Fees) (Amendment) Regulations (Northern Ireland) 2016

Dear Fionna,

Thank you for the opportunity to comment on the above. The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland representing over 11,500 farming families and as such, we would like to make the following comments;

The members of the UFU believe that the ongoing Scrapie monitoring program is important for the Northern Ireland sheep industry in order to maintain a high flock health status. Given that fees have not been amended since 2013, we accept that a review of the current fee structure is required in order to allow DARD to achieve full cost recovery. The committee would however like to request a breakdown for the proposed cost increases in order to ascertain if all of the increases can be justified. To the knowledge of the committee, UK inflation has increased by 2%, 0.5% and 0.1% per year since the beginning of 2013. In light of this, the proposed fee increases of 12.4% for the cost of the initial inspection and 23.2% in the annual flock audit and membership fee appears to be excessive.

In addition to this, to the members' knowledge, the prevalence of Scrapie in Northern Ireland is considered to be low. As such, the UFU believes that DARD should investigate the possibility of deregulating scrapie controls rather than increase the costs of the current monitoring scheme. The membership believes that given the perceived low incidence of Scrapie, DARD should look to move the annual audit process to a biennial audit. Furthermore, the membership believes that DARD should also investigate the possibility to work cooperatively with ROI on an all Ireland Scrapie plan in order to improve trade and accessibility of alternative genetic lines for the industry.

On behalf of the members of the UFU, I trust that these comments will be considered as part of this consultation process.

Yours sincerely,

**Dr Geoff Thompson** 

**Policy Officer** 

Animal Health, Pigs, Poultry