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Department for Environment
Food and Rural Affairs

John Mallinson
Overview and Scrutiny Manager
Carlisle City Council
Civic Centre
Carlisle
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Your Ref: OS 02/04

Date: 9 March 2005

Dear Mr Mallinson,

**Re: Community Overview & Scrutiny Committee – Inquiry into
Environmental & Health Impacts of Foot and Mouth Disease – Final Report**

Thank you for your letter of 13 August 2004 addressed to Philip Hambling requesting a formal response the Committee's final report. Please accept my sincere apologies for the delay in responding to this request, unfortunately due to a clerical oversight, despite acknowledging receipt of your letter, a response was never drafted.

Please find enclosed Defra's formal response to the 16 findings referred to in the Committee's resolution of 30 March 2004.

You may also be interested to note that Defra is currently finalising its latest review of the foot and mouth contingency plan and will be issuing a new generic exotic animal disease contingency plan later this month. This plan builds on the current plan and incorporates the lessons learned from the national FMD exercise in held last June.

Once again please accept my apologies for the delay in responding to your letter.

Yours sincerely


Gordon Hickman
Contingency Plans & Disposals

DEFRA RESPONSE TO THE CARLISLE CITY COUNCIL COMMUNITY OVERVIEW AND SCRUTINY COMMITTEE INQUIRY INTO ENVIRONMENTAL AND HEALTH IMPACTS OF FMD – FINAL REPORT

PARAGRAPHS 1-13,24,27,29

PARAGRAPHS 1 & 24 – PYRE BURNING

Noted. The disposal hierarchy as outlined in the FMD Contingency Plan is incineration > rendering > licensed landfill. Defra policy is not to use mass pyres although smaller on-farm pyres may be required in some remote areas (e.g. the Isles of Scilly) where access to other forms of disposal is impossible or in the event that other disposal outlets have been exhausted. Pyres may be considered in Scotland. Any burning will be undertaken in accordance with the Department of Health guidelines and relevant EU and national regulations so as to minimise environmental and public health impact.

PARAGRAPH 2 - ON-FARM DISPOSAL OF CARCASSES

Noted. Following the 2001 outbreak Defra commissioned Water Management Consultants (WMC) to undertake a review of all the on-farm burn and bury sites. Of the 1,137 sites assessed in England and Wales, the consultants conclude that none of the sites need to be exhumed or that any additional mitigation work is required.

In a few cases worst-case modelling has highlighted the potential for an unacceptable discharge to surface or groundwater. On-going monitoring has been recommended at these 34 sites. Of the 34 sites Defra already has monitoring programmes in place on 16 of them and we have recently written to the other 18 requesting their agreement to contractors entering their land to sample water sources.

Where on-farm burn or bury may be required in future (e.g. in remote areas) operational instructions have been drawn up which include the need for a full site assessment requiring involvement of operational partners. The guidance stresses the need for prior risk assessment and obtaining the necessary authorisations. An SVS official will supervise all disposal sites (whether on-farm or at a rendering or incineration plant) including biosecurity, documents to support audit and providing reports on activity at site.

PARAGRAPH 3 - DISPOSAL OF NON-CARCASE MATERIAL (SOMETIMES REFERRED TO AS C&D PITS)

Noted. Following a pilot study in Wales, in March 2003 the Department commissioned URS Corporation Limited (URS) to undertake an independent this risk assessment of all the sites in England. Their task has been to assess the potential risks from these disposals to key environmental receptors, including public and private water supplies and rivers and streams. The first element of the project was to undertake a desk-based risk ranking exercise. This ranks the sites as Low; Medium; High or Very High Risk. The sites

assessed as High or Very High are then subject to further investigation. This has included telephone calls, questionnaires, modelling, qualitative and quantitative risk assessment (QRA) studies.

Where potential problems have been identified they are fully investigated and appropriate remedial action or mitigation measures taken. Where mitigation is not required but a residual risk may remain, the consultants have recommended an ongoing programme of monitoring. This study has been undertaken in consultation with the Environment Agency.

PARAGRAPH 4 - MAPPING

Accepted. The risk assessment work is still ongoing, but when the work is complete and the assessments verified by the Environment Agency, the grid reference of the site together with a summary of the disposal will be published. Publication is planned for autumn 2005.

PARAGRAPHS 5,6,7 & 8 – WATCHTREE MASS BURIAL SITE

Noted and Accepted. There is an extensive programme of inspection and monitoring of surface water, groundwater and for landfill gas at Watchtree. The results are in the public domain and have been provided to the Environment Agency (EA).

Monitoring will continue at Watchtree until the relevant agency confirms that the possibility of any potential risk to the environment or public health is sufficiently reduced. This is likely to be for at least 15 – 20 years, possibly longer.

Restoration and aftercare plans have been developed in consultation with local authorities, nearby residents and other local stakeholders. They have also, where possible, included planting schemes and measures designed to enhance and improve biodiversity and wildlife value.

The Department wishes to acknowledge the input and support of statutory agencies and local organisations to the Liaison Committee and is confident that similar levels of support will be provided to the Trust.

Para 9 – ACCESSABILITY OF MONITORING INFORMATION

Noted. Defra will review the content, availability and presentation of the monitoring data and will consider whether an annual non-technical summary should be produced.

Para 10 – COMMUNITY INVOLVEMENT AT OTHER CARCASE DISPOSAL SITES

Noted. Since 2001, the Department has sought to engage with and to involve local residents and community groups in ongoing management of the mass

burial sites. The role of community liaison groups has been a key element of this engagement.

In the future, the use of licensed commercial landfill sites will be an essential element of the disposal hierarchy. Defra, as part of its contingency planning for an outbreak, will be preparing, in liaison with the Environment Agency, a list of potentially suitable commercial landfill sites for disposal of carcasses. This list will be made public and the Department will engage with emergency planners, community liaison groups and local authorities to address any concerns.

PARAGRAPH 11 – RENDERING AND SUSTAINABLE DISPOSAL CAPACITY

Accepted. The present disposal hierarchy is based on the use of Commercial Fixed Plant Incineration and Rendering as the preferred methods of carcase disposal. Incineration capacity is limited, but access to that capacity is potentially more rapid than access to the capacity provided by rendering. Rendering remains the Department's primary disposal option.

Although the country is relatively well supplied with rendering and incineration capacity, it is acknowledged that such disposal capacity could not cope with an outbreak of the scale of the 2001 foot and mouth. If incineration and rendering capacity were exceeded, the next option would be the use of commercial licensed landfill sites.

PARAGRAPH 12 – MULTI-AGENCY LOCAL PLANS

Noted. The Department recognises the need for a clear understanding by all parties of the roles and responsibilities of operational partners and stakeholders and that each organisation has clear written plans for their involvement in an outbreak of an animal disease. These plans should clearly be complementary and support the Defra plans. Defra is liaising with LACORS who are producing a template for local authority led plans.

Defra regularly exercises its plans both at local and national level and seeks to involve operational partners and stakeholders in these exercises.

PARAGRAPH 13 – LOCAL CO-ORDINATION

Noted. Defra recognises the need to engage with local emergency planners and Regional Resilience Teams at as early a stage as is possible. However, an outbreak of animal disease is managed centrally according to centrally agreed policies, with local delivery, unlike most other emergencies which are both managed and delivered locally.

PARAGRAPH 27 – VARIOUS SUPPORT MECHANISMS

Noted and Accepted. The Department recognises the value of the various support mechanisms that were put in place during 2001 and has set out its proposals for telephone and other support mechanisms in the various exotic disease contingency plans. The main features would be:

Defra Helpline - The Defra General Helpline (08459 335577) will be prepared for increased public interest, by providing additional staff resources, establishing supplementary helplines and providing briefing. For zoonotic diseases, appropriate public health information will be provided by NHS Direct or similar helplines.

Rural Stress Action Plan Working Group

The Department recognises that an outbreak of animal disease may result in significant social, economic and personal emotional impact, affecting farmers, other rural business-people and residents, as well as Defra staff and contractors. These issues will be addressed through consultation with the Rural Stress Action Plan (RSAP) Working Group, and the Group will be represented on Defra's Contingency Planning Stakeholder Group. This will allow:

- Contingency Plans to include the 'human dimension' of an outbreak;
- Provision to be made for appropriate feedback and consultation during an outbreak to address issues that arise, including arrangements for information to be communicated on a daily basis by an appropriate Defra official (Head of Rural Communities Division) to a representative of the RSAP WG;
- De-briefing and aftercare of individuals affected and to the staff involved in measures taken to control an outbreak to be addressed.

Contacts will be made via the RSAP Working Group with support organisations at a local level and issues such as referral procedures, confidentiality and debriefing for staff addressed.

The Rural Stress Action Plan Working Group brings together, under Defra's chairmanship, representatives of organisations that make an important contribution to the rural support sector, namely the Rural Stress Information Network (RSIN), Royal Agricultural Benevolent Institution, (RABI) Farm Crisis Network (FCN), Arthur Rank Centre (ARC), Samaritans, Citizens Advice Bureaux (CAB), National Farmers' Union (NFU), Tenant Farmers' Association (TFA), Country Land and Business Association (CLA), Transport and General Workers' Union (TGWU), Institute for Rural Health (IRH) and Department of Health (DoH).

Organisations represented on the Working Group, with others, also form partnerships at the regional and local level to address the needs of the rural community including supporting those in distress. County based support "groups" are facilitated by RSIN and FCN, whose organisations and volunteer

members provide information, signposting and, in some cases, telephone helplines. The groups draw on the expertise of the wider partnerships that the network fosters, and there are various “entry points” for enquiries and assistance. Initial contact with these local partnerships should be made via the RSAP Working Group, but once contact has been established, local Defra staff should be encouraged to deal with them direct.

Farming Help is the banner under which RSIN, RABI, FCN and Samaritans promote confidential help for all in the farming community, and contact with any of these via the national telephone numbers will offer callers a wide range of guidance, assistance and support. <http://www.farminghelp.org.uk/>

Farmers and others in the rural community are increasingly aware of the support network, and those Defra staff likely to deal directly with farmers have guidance on how to respond to cases of stress they encounter, including advice on how to make referrals to specialist agencies. This is set out in RDS’s Rural Support Operational Guidance (link at <http://omega/operations/ruralsupport/default.htm>), part of which is designed to increase awareness of the role of national and local rural support networks.

A helpline for Arbitration queries will be established and maintained.

PARAGRAPH 29 – LESSONS LEARNED

a) “Clear, simple and unequivocal procurement procedures”:

Accepted. Procedures for procurement are outlined in the FMD contingency plan as are detailed instructions and guidance on procurement and commercial contracting for the acquisition of goods, works and services. The role of the Defra Procurement and Contracts Division (PCD) can be found in the PCD Contingency Plan.

PCD are responsible for ensuring that robust, value for money contracts are let and mobilised for goods, services and works requirements including their contract management and forensic examination.

PCD and Animal Health Divisional Offices (AHDOs) are currently working together, to put in place national/regional/local contingency agreements and supply contingency arrangements to meet all foreseeable requirements of an emergency. These suppliers will be vetted and subjected to regular review and appraisal to ensure their validity in the event of an outbreak.

These agreements and arrangements will be comprehensive of all the relevant supply chains and will include slaughter and disposal, shepherds and gatherers, poultry catchers and ancillary equipment; carcass pick-up and transportation; preliminary C&D including pressure washers, mobile units; slurry treatment; lagoon and environmental protection measures; electrical works and technical services associated with discrete supply chains; e.g. dairy engineers.

b) "Capacity to immediately achieve 24 hour stock slaughter and 48 hour carcass disposal":

Accepted. Diseased and other susceptible animals on infected premises will be culled with a target of within 24 hours of report. Those identified as dangerous contacts will be culled with a target of within 48 hours of being identified.

Better planning and procurement arrangements allow the NDCC and LDCC to coordinate carcass slaughter and disposal quickly. PCD have more contracts in place for slaughtermen/knackermen than were available in 2001. Access to a national transport, incinerator and rendering database (all of which have been set up since 2001) will facilitate the disposal element of a disease outbreak.

c) "Predetermined sensitive procedures for management and slaughter of stock with young":

Accepted. Management and slaughter of any animal during a disease outbreak will always be carried out to the highest welfare standards and any killing would be under the direct supervision of a veterinarian.

If it is considered appropriate, and to prevent deterioration in welfare standards, Defra will arrange for the slaughter and disposal of animals on welfare grounds. Animals will normally be slaughtered in abattoirs or purpose built killing plants, and where this is not possible on farms. On farm slaughter will only take place when animals cannot be licensed off the farm or when the animals cannot be transported e.g. heavily pregnant animals or newly born calves, piglets and lambs. Each case will be evaluated to ensure that welfare standards are maintained.

d) "Adequate support arrangements for those employed in dealing with an outbreak":

Accepted. The Defra Departmental Health and Safety Unit (DHSU) and SVS Safety Team are the safety professionals who must be involved in all aspects of Contingency Planning and Operational Delivery. They will ensure that all LDCCs have a named safety professional to provide competent advice at all stages of operations; as far as is operationally possible this individual will be located in the LDCC. DVMs and Regional Operations Directors must ensure that the competent safety person is included as part of their management team.

The Departmental Health and Safety Manager will operate as part of the Operations Cell in the NDCC, providing health and safety advice at the strategic level.

The Welfare Service will allocate a Welfare Officer (WO) to deliver the welfare service to each LDCC and HQ offices. The Chief Welfare Officer will keep in close contact with the NDCC to provide strategic welfare advice and guidance to the NDCC Operations Director. The Counselling Support Service will be made available 24 hours daily (including weekends). All staff must be made

aware of Defra's Welfare Service, which can provide support and guidance in individual cases of stress or hardship. RODs must ensure that Managers are aware of the potential for stress and must take appropriate action, including referral to counselling and professional support. In addition, the Department consults and engages with the Rural Stress Action Plan Working Group (RSAP).

e) "Acceptance that an outbreak is both a disaster and a long-term event requiring appropriate responses both in terms of extent and duration":

Noted. This is covered in paragraph 13 above. It should however be recognised that the FMD outbreak of 2001 was exceptional in terms of its scale and geographic coverage. The previous outbreak in 1981 for example only affected a single farm. The Department does however recognise that for large outbreaks, the disease control phase and more significantly, the recovery phase will be a long-term event requiring appropriate management.

f) "Learning from and planning for future wide-scale use of the many effective local responses which emerged":

Accepted. As part of the review of the contingency plan and the operational procedures, the department has actively sought the opinions and suggestions of the local operational staff and partners so as to ensure that best practice has been incorporated into the current instructions. Local exercises are a further way of ensuring that the lessons learned from 2001 are incorporated into current plans and guidance.

g) "Greater pre-planning for and simplified management and administration of stock movement restrictions":

Accepted. This work is ongoing but significant progress has already been made in this area and draft guidance has been produced.

h) "More extensive dissemination of information about and simplification of access to both short-term financial support and advice and longer term recovery and regeneration funding":

Accepted. A range of targeted initiatives including short-term financial assistance, advisory services and longer term recovery measures were introduced during 2001. The need for and targeting of such measures in the future will depend on the scale and nature of the outbreak but the Department recognises the need to make this information readily available and to improve the dissemination of information. It is likely that the Government Offices in the Regions would take an active role in this process.

Defra
March 2005