



Plans to implement Council Directive 2005/94/EEC
on the control of avian influenza

response to the Defra consultation document

by

Rare Breeds Survival Trust

Stoneleigh Park
Kenilworth
Warwickshire
CV8 2LG

Tel: 024 7669 6551

April 2006

1. **The Rare Breeds Survival Trust** represents endangered native breeds of livestock in the UK, and these have been identified as a conservation priority by Defra in the Country Report (2002) and by FAO in the SoWAnGR survey. Several of these breeds have been threatened by recent outbreaks of disease, such as BSE, FMD and TB, and avian influenza is a particularly potent threat to poultry. The Trust supports endangered native breeds of poultry and, through the medium of Poultry Forum, coordinates opinion from various sectors of the poultry industry.
2. **Rare breeds of poultry.** The Trust maintains a database of rare breeds of poultry, and welcomes the statement in Directive 94/2005/EEC (article 1.7) that "officially registered rare breeds of poultry - - means any poultry - - that the competent authority has officially recognised as a rare breed - -". The Trust's lists are advised to the relevant departments of Defra.
3. **The draft partial Regulatory Impact Assessment (RIA)** includes two items of particular relevance to rare breeds, namely derogations for 'non-commercial' units and vaccination, and the Trust welcome some new requirements of the Directive as detailed in Table A.

'Non-commercial' units

4. **Registration.** The Trust is working with Defra on the registration of breeding units, and on the feasibility of individual identification of birds. The latter will facilitate the implementation of derogations, and the Trust would wish to see the current programme of leg ringing extended. The Trust's existing database offers a framework for registration.
5. **Breeds at Risk Register.** The Trust also is working with Defra to develop the Breeds at Risk Register for poultry. The Register should require a robust mechanism for breed identification, and for validation procedures. The Trust recommends that the Rare Breeds Database is developed on similar basis to the Breeds at Risk Register for large livestock as administered by the Trust, and that it utilises the database already established for poultry by the Trust.
6. **Rare breeds.** The Trust welcomes Article 13.1 of the Directive which notes that authorities may "- - grant derogations - - in case of an outbreak of HPAI in - - officially registered rare breeds of poultry - -" subject to various conditions. The Trust supports these derogations, which reinforce the importance of protecting rare breeds to conserve their special genes and to maintain diversity within the poultry population.
7. **The derogations** recognise not only the genetic importance of rare breeds, but also the low risk posed by non-commercial poultry in the spread of disease.
8. **Waterfowl.** The conditions, which are a pre-requisite for the derogations, include the housing of birds and this will present significant difficulties for waterfowl.

Vaccination

9. **Vaccination policy.** Clause 20 of the preamble to the Directive states that "Vaccination against avian influenza can be an effective tool to supplement disease control measures and to avoid massive killing and destruction of poultry or other captive birds. Current knowledge suggests that vaccination may be useful not only as a short-term measure in emergencies but also as a long-term measure to prevent disease in situations of higher risk of introduction of avian influenza viruses from wild life or other sources. Provision should therefore be established for both emergency and preventive vaccination". The Trust urges most strongly that this policy is adopted.
10. **Precedents.** Vaccination has been used successfully to control avian influenza elsewhere (Hong Kong, Holland), and research by Swayne (*Avian Pathology* 2006, 35(2) 141-146) demonstrates that vaccines give protection against spread of the disease.
11. **The RIA** (Vaccination 2.16) states that "The Directive includes an option for emergency and protective vaccination - -" but adds that "- - vaccines do not form part of the current UK avian influenza control strategy - -". The Trust can not endorse this opinion. Vaccination should form an integral and important part of the control strategy.
12. **Zoological collections.** We welcome the further statement (2.16) that "There may be a role in the UK for vaccination to protect zoological collections of rare or endangered breeds", but it is not a strong statement and the definition of zoological collections is not clear. It should include all conservation units of rare breeds. Rare breeds should have the same protection as zoos.
13. **Other control measures** also must include rapid diagnosis, control of imports, evaluation of the threat from wild birds, etc. Slow diagnosis (as seen in FMD in 2001, and recently with AI in Norfolk) gives the disease opportunity to spread. Imports require close surveillance. The danger from wild birds should be recognised, especially in view of the scale of the industry. For example, pheasants are reared on more than 10,000 holdings, and 30 million game birds are reared for release each year.

Lawrence Alderson
Chairman