



Date: 31 July 2014

Dear Consultee

Consultation on Proposed Change to the Brucellosis Bulk Milk Tank Sampling Regime for Producer-Retailers

The Animal Health and Veterinary Laboratories Agency (AHVLA) currently collect quarterly bulk milk tank samples from producer-retailer farms for the brucellosis surveillance programme. I am writing to invite your views on transferring this responsibility to producer-retailers. **It is proposed that producer-retailers collect and submit three bulk milk tank samples a year themselves.** The AHVLA will continue to collect the fourth sample, in light of the higher risk to public health from raw milk/milk products.

By changing the current sampling regime for producer-retailers through a legislative amendment, we aim to ensure, at minimal cost, continued robust, consistent, proportionate and cost-effective disease surveillance practices. This will also bring greater fairness within the dairy industry by aligning bulk milk tank sampling arrangements with the existing statutory requirement that applies to primary purchasers of milk. Milk purchasers already supply bulk milk tank samples to an approved laboratory for testing at their own expense.

It is anticipated that this change will result in a small new cost to producer-retailers for time to collect the sample, packaging and postage. This is estimated to be minimal; in the region of **£16.50 per business, per year**. It may be possible for producer-retailers to reduce these costs by asking the private laboratories, who collect milk samples for other purposes (e.g. microbiological/quality testing), to submit the sample on their behalf. Government will continue to meet the laboratory costs of the testing itself. AHVLA will also supply producer-retailers with sample pots and issue a reminder letter when the sample is due.

We also anticipate some benefits from this approach. For example, the removal of a very small biosecurity risks associated with farm visits to collect bulk milk tank samples.

Responses

This letter, the consultation questionnaire and Impact Assessment can be found at <https://consult.defra.gov.uk/animal-health-and-welfare/brucellosis-milk-sampling-producer-retailers>

We welcome your views and comments on the proposals. To submit your consultation response, please use Citizen Space (our on-line consultation tool).

Responses should be received by **Thursday 18th September 2014**.

Alternatively, you can request a hard copy of the questionnaire by writing to:

Tracy McDonald
Department for Environment, Food and Rural Affairs
Zoonoses Policy Team
Area 5B Nobel House
17 Smith Square
London
SW1P 3JR.

bulk_milk@defra.gsi.gov.uk

Thank you for your help in this matter. If you have any queries, please contact us as above.

Yours faithfully

Tracy McDonald

Department for Environment, Food and Rural Affairs

Consultation Criteria

1. This consultation is issued in line with the Governments Consultation Principles (<http://www.cabinetoffice.gov.uk/resource-library/consultation-principles-guidance>).
2. When this consultation ends, copies of the responses to this consultation will be made available to the public on request. Please contact the Zoonoses Policy Team (address above) if you would like copies.
3. If you do not want your response - including your name, contact details and any other personal information – to be publicly available, please say so clearly in writing when you send your response to the consultation. Please note, if your computer automatically includes a confidentiality disclaimer, that won't count as a confidentiality request.
4. Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. However, because of the law, we cannot promise that we will always be able to keep those details confidential.
5. We will summarise all responses and place this summary on our website at www.gov.uk/defra. This summary will include a list of names of organisations that responded but not people's personal names, addresses or other contact details.
6. If you have any comments or complaints about the consultation process, please address them to:

Defra Consultation Co-ordinator,
Room 629
9 Millbank
17 Smith Square
London
SW1P 3JR
Or email consultation.coordinator@defra.gsi.gov.uk.

Further Background

1. Council Directive 64/432/EEC defines the requirements for a monitoring and testing programme for brucellosis to ensure that animals intended for intra-community trade are not a source of contagious or infectious disease.
2. As part of our brucellosis surveillance programme, AHVLA officers currently collect quarterly bulk milk tank samples direct from producer-retailers. Producer-retailers are those who sell milk/milk products directly from the farm to the public or retailers. This can include sale of raw (unpasteurised) milk/milk products.
3. A GB-wide review of brucellosis surveillance highlighted disproportionately high costs and resource associated with AHVLA undertaking farm visits for the collection of these samples. The review recommended that responsibility be transferred to industry, bringing producer-retailer sampling in line with primary milk purchasers who already have a statutory responsibility to supply bulk milk samples to an approved laboratory for testing at their own expense.
4. The testing itself is currently (and will continue to be) undertaken by AHVLA and paid for by Government.
5. It will be necessary to amend legislation to enable this transfer of responsibility and it is envisaged that the legislation would come into force in early 2015.
6. An Impact Assessment has been prepared to explore the costs and benefits of this approach and is attached to this consultation. It should be noted that the Impact Assessment also considers the costs and benefits of a reduction in the frequency of bulk milk tank testing (from monthly to quarterly) for Brucellosis surveillance. **We are not consulting on this issue**, since this change was implemented administratively in April 2011. However, we will be updating the legislation to ensure that the requirement for quarterly testing is clear and enforceable.