Environment, Climate Change and Land Reform Committee

EU Environmental and Animal Welfare Principles

Written submission from National Office of Animal Health

Written evidence submitted by NOAH to the Scottish Environment, Climate Change and Land Reform (ECCLR) Committee Inquiry on the EU Environmental and Animal Welfare Principles.

NOAH has been representing the companies that research, develop, manufacture and market licensed animal medicines across the UK, including Scotland, since 1986. The industry is highly regulated and our aim is to promote the benefits of safe, effective, quality medicines for the health and welfare of all animals – both farm animals and pets. The association's membership represents over 90% of the UK animal medicines market worth in excess of £645 million per annum (2017) and directly supporting 2,000 highly skilled jobs, as well as indirectly supporting 19,000 vets, over 6,000 qualified animal health advisors (SQPs), over 11,000 veterinary nurses and thousands of livestock farmers and people involved in pet and equine care, sports and leisure. Good animal health is an integral part of good animal welfare.

NOAH response to committee questions:

1. How important are the EU principles of:
   • the precautionary principle
   • preventive action
   • environmental damage should as a priority be rectified at source
   • the polluter should pay
   • animal sentience

NOAH supports the protection of the health and welfare for all animals. The appropriate recognition of animal sentience is crucial in helping to safeguard our farm and companion animals from pain, suffering, injury and disease. This important recognition also helps to restore animal health when needed. Our society rightly values high standards of animal welfare and we must ensure that we can continue to support good welfare outcomes for our animals. An essential part of this is taking measure to establish animal sentience within the fabric of animal welfare policy and legislation.

In relation to regulatory assessment, NOAH supports rigorous, independent, scientific based regulatory assessments, which will allow the development and use of scientific technologies to help ensure animal health and welfare can be maintained both for farm animals and companion animals.

2. How and where have these principles had an impact on environmental and animal welfare policy in Scotland?
3. Views on the appropriateness of retaining/adopting/enshrining these EU principles in law or alternative principles/approaches that could be adopted.

NOAH supports the recognition of animal sentience in Scottish animal welfare policy and legislation. We encourage a cohesive approach on animal sentience, which supports consistent protections for all animals in the UK.

4. Views on if and how environmental principles could and should be enshrined in law in Scotland and enforced.

5. Examples of where key environmental principles have been enshrined in domestic legislation elsewhere.

All of the authorised veterinary medicines available in the UK for animals must undergo a strict regulatory approval process, before they gain a Marketing Authorisation (MA) or licence for sale and supply. This is governed by the UK Veterinary Medicines Regulations 2013, which themselves are based on the EU Veterinary Medicines Directive (EC 2001/82). This legislation is UK-wide, and so applies in Scotland.

For the animal medicines industry the environmental safety of veterinary medicines is assessed before they are allowed on the market as part of the authorisation process; if they are found to pose an unacceptable risk, they are not authorised: essentially, preventive action. This process has been in place since the 1990s.

As a part of this process, environmental presence is predicted and modeled; this is then used with ecotoxicity data to evaluate and quantify any potential environmental risk.