Concerns about Market Access for FMD-free Dairy Herds pre-emptively vaccinated against FMD

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INTRODUCTION

FMD affects market access for the dairy industry, not only on the dairy side but also on the meat and cattle movement side. WOAH does not require that healthy herds pre-emptively vaccinated against FMD be placed under quarantine. Furthermore, importing countries do not discriminate against products from healthy animals that were pre-emptively vaccinated against FMD. Placing healthy vaccinated animals under quarantine is an outdated policy of the South African Animal Health Division. It is not a law, regulation or rule, but merely a policy decision. To that end, I would like to summarise the effects of FMD on the dairy industry and propose the following recommendations for the FMD contingency plan.

RECOMMENDATIONS

- Do not quarantine healthy herds that are pre-emptively vaccinated against FMD. Farmers will refuse to have their healthy herds preemptively vaccinated out of fear for the consequences of being placed under quarantine.
- Vaccinated herds should be considered FMD-free, similar to unvaccinated herds, until symptoms or test results indicate otherwise.
- If required, implement a short period of "quarantine light" post-vaccination that prohibits only animal movement. During this period, animals may only be moved to any abattoir. No processing or export restrictions should be placed on any products from these animals.
- Consider reducing the 12-month quarantine period for FMD-positive herds to 3 or 6 months post day Zero for a limited period until FMD is brought under control. This will allow the economy to suffer less damage due to FMD.

Under the current South African policy, an FMD-free dairy farm that is pre-emptively vaccinated, is placed under quarantine, with the following consequences:

MILK PROCESSING

Double pasteurisation and UHT treatment of milk

All milk from a farm under quarantine must be either double pasteurised or UHT-treated. Very few milk processors can produce UHT milk, as it requires a processing plant that is specifically adapted for this purpose. Likewise, double pasteurisation adds significant cost to the process and, in some cases, requires additional equipment and space. In addition, processors that process milk from FMD-infected and FMD-free farms also need to demonstrate that they can

separate the processing lines or pasteurisation processes for infected and “clean” milk. This leads to higher milk processing costs and more frequent equipment cleaning between batches. Adding additional cost and complexity.

Cheesemaking

Milk processed by double pasteurisation or UHT is generally not suited for producing cheese. Therefore, milk from quarantine farms often needs to be transported long distances to processing plants that can process and use it. This adds additional cost.

Processing equivalence

Dairy products, such as amasi and custard, are processed from single-pasteurised milk that is then heated to a higher temperature for a longer time than required for the second pasteurisation. Some dairy treats are made from powdered milk that is reconstituted with water, pasteurised again and then processed into dairy treats. These two processes exceed the standard set by double pasteurisation. Yet the South African authorities do not allow these products to be exported. WOAH allows “equivalence” where alternative processes can be proven to be effective against FMD.

Milk from an uninfected farm that is pre-emptively vaccinated, should not be subject to any of the above limitations.

SLAUGHTER

FMD-approved abattoirs

If a farm is quarantined after vaccination, animals from the quarantined farm may only be sent to FMD-designated abattoirs. Abattoirs that are approved to slaughter quarantined animals lose their export licence. In addition, abattoirs incur extra expenses to qualify to slaughter FMD animals. Not all abattoirs are willing or able to comply with the requirements for approval. Therefore, there is a severe shortage of abattoirs capable of handling animals from quarantined farms. For the first 6 months post-day zero, all quarantined animals may be slaughtered only at an FMD-approved abattoir.

Discarding the 5th quarter

For the first 6 weeks post day Zero, it is not economical to send an animal for slaughter, as much of the carcass must be discarded. With the 5th quarter disposed of up to 3 months post day-zero, the farmer still loses a significant portion of the slaughter income. FMD-approved abattoirs are frequently further away than the farm’s regular abattoir, leading to additional transport costs.

Beef from dairy

The slaughter value of culled animals contributes significantly to a dairy farm's income. Not only do dairy farmers suffer financial losses due to loss of production animals and reduced milk production, but they also receive less for the carcasses of FMD-quarantined animals. This compounds the devastating effect of FMD on a dairy farm.

EXPORTS

Although WOAH states that double-pasteurised, UHT-treated milk or milk from healthy vaccinated animals is fit for export, several importing countries refuse to accept any milk from quarantined herds or from any herds within a 10 km radius of a quarantined farm, regardless of how the milk was processed. Therefore, placing a healthy farm under quarantine post-vaccination affects all dairy farms within a 10km radius. This also places additional strain on dairy processors since all milk from these farms has to be double pasteurised or UHT-treated.

MOVEMENT RESTRICTIONS

Dairy calves

Quarantined farms are prohibited from transporting any animals off the farm, except for slaughter at an FMD-approved abattoir. It is an unfortunate reality that dairy farms produce calves in excess of their requirements. These calves are then sold to other dairies, calf-rearers or sent for slaughter as veal. Under the processing requirements for carcasses within the first 6 months post day-zero, it is uneconomical to slaughter any calves. Since these calves may only be sent for slaughter, none can be sold to other farmers or calf rearers, which results in them accumulating on the farm. These calves have no value, are a drain on the farmer's finances and resources, and are, as a result, killed on the farm. Apart from the welfare issues this causes, it also adds to the emotional stress of the farmer and his labourers.

Dry cow and heifer farms

It is common practice for dairy farmers to have a separate farm where the heifers are reared, or the dry cows are kept. When these animals are close to calving, they will be moved to the farm with the milking parlour, where they will calve and be milked. These heifer and dry cow farms can be several hundred kilometres away and are sometimes even in another province. If a farm is placed under quarantine, no movement between farms is allowed. Unfortunately, a pregnant cow will calve regardless and needs to be milked. Dry cow farms lack the facilities to milk large numbers of high-producing cows. This has severe welfare implications beyond the financial losses that the farmer experiences.

F-BRANDING

F-branding should be reserved for animals from FMD-infected herds. F-branded animals fetch a lower price at market. A different means of identifying and tracing uninfected animals that were pre-emptively vaccinated is required. Dairy farms are renowned for their detailed record-keeping. Traceability on dairy farms is therefore unlikely to pose a problem.

WIDESPREAD VACCINATION

Unvaccinated herds should be considered disease-free until symptoms or test results indicate otherwise. Placing FMD-free herds that are pre-emptively vaccinated, under quarantine makes no sense. If widespread vaccination is to be implemented, the regulations need to be changed with urgency! Quarantining vaccinated, disease-free herds disincentivises farmers to vaccinate their herds. In addition, the entire dairy industry value chain incurs losses when a farm is quarantined.

“QUARANTINE LIGHT”

There is a fear that a herd may be asymptomatic at the time of vaccination. As an alternative, consider a “quarantine light” period of 2 weeks post-vaccination during which no animals may be moved off the farm. The milk or meat should not be placed under any restrictions. If no symptoms appear within these 2 weeks, the “quarantine light” is lifted. The primary fear is that animals incubating the disease may be moved and spread FMD. The 2-week movement restriction is sufficient time to confirm that the herd was not incubating FMD at the time of vaccination.

Any herd that shows symptoms, pre- or post-vaccination, will be placed under quarantine in accordance with standard procedure. Consider a reduced 3 or 6-month quarantine period post-day Zero to allow market access and financial survival for farmers and processors of animal products.

ECONOMIC IMPACT

South Africa only became a net dairy exporter approximately 3 years ago. With the current strong rand and the possible domestic reduction in milk and dairy production due to FMD, a perfect storm is brewing in which imported dairy and meat may become cheaper than locally produced alternatives. This will inevitably lead to farms and/or dairy processors losing market share and possibly facing closure. The dairy industry’s financial contribution to communities goes much wider than just milk and cheese. Apart from the direct influence, such as employing rural communities, feed and fertiliser companies, agricultural advisors, veterinarians, and farm implement sales, the dairy industry also supports a wide range of secondary support services. Such as transport companies, marketing companies, the packaging industry, banking, financial services, municipal taxes, etc. If the domestic dairy industry shrinks, domestic GDP will shrink, as money will leave the country in search of cheaper imports. Regaining this market post-FMD will be difficult.

We, the undersigned, all support the request that healthy herds that are pre-emptively vaccinated are not placed under any quarantine restrictions.

Name	**Designation/Position**	**Organisation/Company**
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