

DEFRA: A new independent body for animal health: A modern governance and funding structure for tackling animal diseases**Response by the Wellcome Trust**

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1. The Wellcome Trust is the largest charity in the UK. It funds innovative biomedical research, in the UK and internationally, spending over £600 million each year to support the brightest scientists with the best ideas. The Wellcome Trust supports public debate about biomedical research and its impact on health and wellbeing.
2. The Trust's mission is to foster and promote research with the aim of improving human and animal health. Part of the Trust's work therefore involves funding animal health research, both to directly improve animal health and to improve understanding at the human-animal health interface. We welcome the opportunity to respond to Defra's proposals to form an independent body for animal health and alternative funding arrangements for this entity, and have focused our response on the implications of the proposals for animal research.

Question 2: Comments are invited on the proposals for a new body, including its scope, governance and working arrangements.

3. The Trust welcomes the principle of devolving responsibility for animal health matters to an independent arms-length body: it is sensible to have one locus for animal health policy responsibilities such as research and development; surveillance; disease reporting; and testing, while the representation of a diverse range of stakeholders in the governance arrangements of the body will increase accountability.
4. It will of course be important to ensure that the new body establishes good links both with Defra, and across other Government departments, to ensure the coherence of policies in this area, particularly in relation to animal welfare – which we note will not be within the remit of the new body.
5. We agree that the Board should have representation from a wide number of groups involved in the animal health area, including the academic and research community. We are pleased to see that the new body will have 'action informed by the best available scientific evidence and advice' as a key principle for operation, and would agree that the establishment of a formal scientific council or committee could be an effective mechanism for developing long term research priorities.
6. In addition to directly benefiting the health and welfare of animals, animal health research is increasingly acknowledged as an essential tool in public health to improve understanding of zoonotic and emerging diseases, as well as to understand changing patterns and burden of diseases within all species. The establishment of a new body provides an excellent opportunity to increase awareness of this vital importance of animal health research, as well as strengthening links with public health communities. It should aim to draw together the research community to minimise duplication; facilitate interaction and sharing of data sets between researchers; and to take advantage of the research potential of surveillance activities.

7. Maintaining links with external stakeholders, including research organisations and funders, will be crucial. We hope that the new organisation will uphold Defra's current collaborative working arrangements. With regard to animal health research, the Trust is increasingly working in collaboration with Defra in a number of areas, most recently with the Pollinator's Initiative¹ and activities around the 'swine-origin' H1N1 outbreak. We hope the new body remains responsive to collaborating in emerging research activities.
8. We would welcome clarification as to the relationship between the new Food and Environment Research Agency (FERA) and the proposed animal health body. For example, will responsibility for policy and research around bee health, which currently lies with FERA, move to the animal health body once it is established?
9. Aside from responsibilities relating to animal research, the new body will also have responsibility for import and export of animals. The Trust responded to a Defra consultation on this issue in 2008, drawing attention to concern to the implications on medical research of a ban on the sale of non-native species². We would emphasise the importance of consulting widely issues such as this, to ensure the views of all stakeholders are taken into account.

Question 5: Views are invited on the proposed delivery arrangements to be established when the new body is set up. Are there specific changes to the current organisational structures that would improve delivery of animal health policies for the businesses affected?

10. The Trust provides funding for research to a number of the organisations which currently form part of the Defra animal health and welfare 'delivery landscape', including the Veterinary Laboratories Agency (VLA) and the Institute for Animal Health (IAH). While we welcome the Government's commitment to simplify the 'delivery landscape', we would suggest that the new body fully consults on any modifications and mergers to ensure existing service of these important organisations is not compromised.

Question 7: Views are invited on the proposed funding framework.

11. While the Trust is not in a position to provide detailed comments on the proposed funding framework, we would like to highlight a number of key points:
 - Surveillance for emerging diseases and research into prevention and disease control are vital activities which must not be compromised. It is therefore essential to ensure that the proposed funding framework, and contributions from the industry sector, are both achievable and sustainable.
 - Research is often cross-cutting and widely beneficial. We therefore agree that it is preferable not to apportion costs to specific livestock sectors, but to share between different sectors.
 - The need and benefits of research into animal health should be clearly communicated to ensure that research is not viewed as an expendable commodity by any livestock sectors.
 - Past exotic diseases outbreaks have demonstrated the absolute importance of ensuring rapid responsiveness; disagreement over funding, including insurance requirements, should not be allowed to compromise this area.

¹ <http://www.wellcome.ac.uk/Funding/Biomedical-science/Grants/Other-initiatives/WTX055269.htm>

² Consultation response available at:

http://www.wellcome.ac.uk/stellent/groups/corporatesite/@policy_communications/documents/web_document/WTD038292.pdf

Question 8: Views are invited on these proposals for the levy mechanism.

12. The Trust notes that exemptions from levy payments will be provided for 'recognised research establishments'. We would welcome further detail as Defra develops this policy on the groups to which this exemption would be applicable and how it might function.

Question 9: Views are invited on the proposal for an animal health strategy board, its role and composition.

13. We support the formation of an animal health strategy Board as an interim measure prior to the development of the new body. It will be important to clarify how the interim Board transfers responsibilities to the new body and the proposed scientific committee, and to ensure that the process is clear for external stakeholders and partners.