Martin Blake, MVB, MBA, MRCVS

Independent External Reviewer

5 November 2026

To: The Minister of Agriculture, Environment and Rural Affairs
Department of Agriculture, Environment and Rural Affairs (DAERA)

By Email Only

RE: Submission of the Independent External Review into the Fivemiletown Livestock Culling Operation (29–30 June 2026)

Minister,

I am pleased to submit, herewith, the final report of the Independent External Review into the planning, governance, and operational delivery of the departmental livestock culling operation carried out near Fivemiletown, County Tyrone, on 29 and 30 June 2026. This review was formally commissioned following your directive on 2 August 2026, in response to significant public, media, and political concern surrounding the intervention.

In accordance with the Terms of Reference, this report provides an objective, evidence-based assessment of whether the Department's actions were entirely consistent with the relevant statutory frameworks, internal procedures, and accepted standards of public administration. To ensure a rigorous and balanced evaluation within a compressed timeframe, the review examined more than 300 individual records, conducted comprehensive media analyses, and engaged directly with more than 50 individuals, including frontline operational staff, senior departmental management, external contractors, public representatives, organisational representatives, and local residents.

The findings of this review reveal that the culling method used was entirely lawful, and, from an animal welfare perspective, appropriate. The field operation was generally well-planned and delivered by trained marksmen, however the intervention had certain systemic governance vulnerabilities. There was a lack of specific procedural guidance on the implementation of deprivation orders and there was a significant non-alignment between operational field protocols and strategic briefings regarding carcase removal.

On the ground, there were inconsistencies in field record-keeping and calves were missed during site clearance, including one discovered on a public roadway with a neck wound some days later. The pre-operational planning did not adequately take into

account likely public perception or the emotional impact of the operation on the community, and this was exacerbated when the operational plan was changed midstream to allow the private sale of some of the animals. This was a significant operational change which introduced further additional operational and reputational risks which were not dynamically risk assessed, but which materialised later on the evening of 29 June when efforts by third parties to corral the animals failed in public view and animals escaped onto the roadway. Further, the review was not able to conclusively establish why three animals were culled on Site 1 after the decision to suspend the cull to allow a private sale take place, reflecting either a miscommunication or a tactical decision which was not documented. The Department's traditional, reactive communications approach to on farm enforcement was neither prepared nor equipped for the fast-moving media storm that materialised some four weeks after the event and which exposed individual staff members to intimidation and antagonism.

To address these systemic deficits and provide corporate assurance for future interventions, the report puts forward ten core operational recommendations structured across three operational pillars, as set out in Chapter 9:

- **Pillar I - Governance, Oversight and Legal Frameworks**: The review proposes establishing a more rigorous oversight system by expanding the welfare panel system to include a multi-disciplinary post-conviction review panel, ensuring enforcement methods are collectively evaluated for risk and proportionality before any large-scale deployment. To guarantee clear administrative accountability, the report recommends a structural reorganisation and unification of team oversight to bring all operational and logistical functions of the Humane Slaughter Team under a single management structure and the Department consider separating out overall enforcement activities from general welfare responsibilities. Finally, under the proposed operational sign-off and strategic leadership notification protocol, any high-risk intervention would require written authorisation from Director-level management and a formal advance briefing to senior strategic leadership and the Minister's Office at a pre-determined time to effectively manage corporate risk.
- **Pillar II - Pre-Operational Planning and Risk Assessment:** The review proposes a documented options assessment, phased strategies, and communications preparedness framework to ensure planners document written evidence of alternative approaches, evaluate phased depopulation to reduce resource stress, and deploy proactive communications to manage public expectations. To eliminate data gaps, the report highlights the need for clear record-keeping rules and standardised field reporting templates that enforce the real-time recording of tactical choices, ear-tag data capture at confirmation of death, and of secondary shots. Finally, it recommends that the Department formalise inter-agency agreements, perimeter management and site clearance protocols with the PSNI to establish secure operational perimeters, road closures, and restricted airspace ("no-fly zones") as determined necessary.
- **Pillar III - Field Operations and On-Site Management:** To strengthen on-the-ground control, the report proposes that site leaders be appointed to individual locations during multi-site tasks, and that a dedicated veterinary welfare officer

independent of the enforcement team be appointed to large scale culling operations to focus solely on animal welfare aspects to provide public assurance. The recommendations also highlight the need for a protocol for timely carcase collection and dynamic risk assessments, requiring strict carcase management for prompt, same-day removal or visual shielding from public view. Under this same protocol, any spontaneous decision to alter the course of an active operation must be followed immediately by a fresh, documented dynamic risk assessment.

Furthermore, and notwithstanding that this fell outside the strict Terms of Reference of the review, in recognition of the extensive public concern regarding systemic delays within the wider animal welfare enforcement framework, a forward-looking evaluation of strategic legislative reform has been compiled separately in Appendix A. This analysis outlines a primary strategic goal to move away from the current administrative and prosecutorial bottleneck by introducing a swift administrative notice procedure, using a transparent process of procedural co-design with agricultural stakeholder organisations to establish robust legal safeguards. While Northern Ireland inspectors currently possess these intervention powers, they are legally required to apply to the courts for a separate disposal order after a seizure has occurred. The proposed framework removes this post-seizure judicial bottleneck, allowing decisions to take immediate legal effect unless an appeal is actively triggered by the keeper. The analysis identifies interim statutory adjustments that would provide for pre-emptive disposal orders and expedited civil court access, pending full legislative reform. Finally, to sort out developing welfare problems before they get out of hand, it proposes a common-sense approach that begins with an informal voluntary support network with a firm cut-off time, transitioning immediately to mandatory time-bound advisory support via a Section 10 Improvement Notice if a keeper cannot or will not make measurable improvements.

I wish to record my sincere appreciation to the Review Secretariat for their invaluable logistical and administrative support in sourcing and collating an extensive volume of departmental documentation in support of the review.

I trust that this report provides you, the Department senior leadership team, and the public with the necessary transparency, reassurance, and constructive guidance to strengthen future animal welfare enforcement practice across Northern Ireland.

Yours sincerely,



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