DEPARTMENTAL RESPONSE & ACTION PLAN

Independent External Review

Planning, Governance and Operational Delivery of the Livestock Culling Operation near Fivemiletown, County Tyrone, 29-30 June 2026

Department of Agriculture, Environment & Rural Affairs

09 November 2026

1. Departmental Response

The Department welcomes the Independent External Review into the planning, governance and operational delivery of the livestock culling operation near Fivemiletown and accepts the ten recommendations arising from the Review.

The Department acknowledges the seriousness of the matters examined and accepts the need to learn fully from the operation and strengthen the governance, planning, assurance and delivery arrangements that will apply to future complex enforcement interventions.

The Review provides important assurance in a number of areas. It concludes that the Department was acting to implement a valid court order; that the decision to undertake in-situ culling was justified by the legal, animal welfare and operational circumstances; that free-bullet culling was an appropriate and humane method in the circumstances; and that the animals culled during the operation were killed humanely by appropriately trained personnel.

At the same time, the Department fully recognises the weaknesses identified by the Review. In particular, these relate to governance and managerial accountability; the absence of sufficiently developed post-conviction procedures; the recording and assurance of decision-making; consideration of alternative and phased approaches; the management of changes to operational plans; site clearance and field recording; strategic communications; carcase management; and the need to give greater consideration to the impact of high-visibility enforcement activity on local communities.

The Department accepts the Review's central lesson that lawful and technically competent operational delivery must be accompanied by robust administrative governance, clear accountability, demonstrable proportionality, effective risk management and appropriate consideration of wider public and community impacts.

The Department is therefore committed to implementing the ten recommendations through a formally governed improvement programme, led by the Chief Veterinary Officer, with senior departmental oversight and regular reporting.

2. Action Plan

Pillar I: Governance, Oversight and Legal Frameworks

Recommendation	Departmental Response & Commitment	Intended Outcome	Target Timescale for Delivery
1. Establish a Post Conviction Review Panel	**Accepted**: The Department will extend its existing Welfare Panel arrangements to provide multidisciplinary consideration of the implementation of relevant court orders. Revised arrangements will include documented consideration of proportionality, legal requirements, animal welfare, operational feasibility, options, risks, cost and wider impacts before significant depopulation activity is authorised.	Significant enforcement interventions are subject to structured, evidenced and multidisciplinary scrutiny before deployment.	Q1 2027
2. Clarify Custody, Liability and Maintenance Arrangements	**Accepted.** The Department will obtain legal advice on custody, care, liability and maintenance following the expiry of statutory appeal periods, including	Legal responsibilities are clear and consistently applied, removing the uncertainty identified by the Review	Q4 2026

Recommendation	Departmental Response & Commitment	Intended Outcome	Target Timescale for Delivery
	circumstances where additional time is afforded for self-disposal. The conclusions will be translated into clear operational guidance and documentation.		
3. Structural Reorganisation and Unification of HST Oversight	**Accepted.** The Department will review, amend and strengthen the governance and management arrangements for the Humane Slaughter Team and associated enforcement functions to establish a clear and accountable management model covering operational, administrative, logistical and external-agency liaison responsibilities. The Department will also review and revise the relationship between complex enforcement and routine welfare compliance functions and make changes to ensure standard welfare non-	A single, coherent and accountable governance structure with unambiguous responsibilities	Q1 2027

Recommendation	Departmental Response & Commitment	Intended Outcome	Target Timescale for Delivery
	compliance duties are not overshadowed.		
4. Operational Sign-Off and Strategic Leadership Notification	**Accepted.** Risk-based escalation criteria will be introduced for complex interventions. Qualifying operations will require a documented options assessment, formal senior operational authorisation and timely notification of departmental senior leadership and the Minister's Office. Supporting briefing arrangements will be reviewed to strengthen consideration of strategic, organisational and public-interest risk.	Appropriate senior oversight before deployment while preserving the operational autonomy of on-site commanders during live activity.	Q4 2026

These commitments respond directly to the four governance recommendations in the Review’s consolidated schedule.

Pillar II: Pre-Operational Planning & Risk Assessment

Recommendation	Departmental Response & Commitment	Intended Outcome	Target Timescale for Delivery
5. Clear Guidance on Seizure and Culling	**Accepted.** The Department will reassess and consolidate operational guidance for the implementation of relevant court orders, seizure and field culling. Revised procedures will address proportionality, method selection, animal welfare, public and staff safety, community impact and associated operational controls	Clear, consistent and comprehensive guidance supports defensible operational decision-making.	Q1 2027
6. Documented Options Assessment, Phase Strategies and Communications	**Accepted.** The Department will ensure that complex interventions are supported by documented consideration of reasonable alternatives, risk, cost and whether phased or staggered implementation would reduce operational or wider impacts.	Significant operational choices are demonstrably proportionate, evidence-based and accompanied by appropriate communications planning.	Q1 2027

Recommendation	Departmental Response & Commitment	Intended Outcome	Target Timescale for Delivery
	Communications planning will be integrated into the planning of sensitive operations, including appropriate stakeholder notification and readily available factual information		
7. Record-Keeping and Standardised Field Reporting	**Accepted.** The Department will strengthen field recording requirements using standardised documentation. This will capture material operational decisions, animal identification, secondary confirmation shots, deviations from plan and appropriate individual/site sign-off.	A reliable contemporaneous audit trail supports accountability, operational assurance and post-event scrutiny.	Q1 2027
8. Inter-Agency Arrangements, Perimeter Management and Site Clearance	**Accepted.** The Department will urgently reexamine relevant arrangements with the PSNI to ensure that clear and resilient communication and escalation arrangements are in place for live operations. Departmental procedures will also be strengthened for	Stronger inter-agency coordination and demonstrable assurance that operational sites have been properly secured and cleared.	Q1 2027

Recommendation	Departmental Response & Commitment	Intended Outcome	Target Timescale for Delivery
	perimeter management, public/road access, systematic site clearance and the management and retrieval of missing animals.		

The Review specifically identifies the need for documented alternatives, proportionality and cost assessment, communications preparedness, stronger field records and systemic “clear-site” arrangements.

Pillar II: Field Operations & On-Site Management

Recommendation	Departmental Response & Commitment	Intended Outcome	Target Timescale for Delivery
9. Site Leadership and Independent Welfare Assurance	**Accepted.** Complex multi-site operations will have clearly designated site leaders accountable to the overall operational controller. Criteria will also be established for the designation of a veterinary welfare officer, independent of the enforcement team, for	Clear command and control at every operational site with enhanced independent animal-welfare assurance where warranted.	Q4 2026

	large-scale or otherwise sensitive culling operations.		
10. Carcase Management and Dynamic Risk Assessment	**Accepted.** Operational procedures will establish explicit carcase-management expectations, including priority removal or appropriate shielding where immediate removal is not possible. Material deliberate changes to approved operational plans will include documented reassessment of risk and effective cross-site communication and acknowledgement.	Changes in operating conditions are controlled and documented, and the visual and community impact associated with carcases is minimised.	Q4 2026

These measures address the Review's findings on site leadership, carcase handling, cross-site coordination and the need for a fresh risk-assessment when the planned operation is deliberately altered.

3. Implementation & Assurance

Senior Responsible Owner

The Chief Veterinary Officer will be the Senior Responsible Owner (SRO) for implementation of the Action Plan. Delivery responsibility will sit within Veterinary Service Animal Health Group (VSAHG), drawing on relevant policy, operational, legal, communications, corporate governance and other departmental expertise as required.

Implementation Board

The Implementation Board will comprise the VSAHG Senior Management Team and will be chaired by the SRO. The Implementation Board will:

- Maintain strategic oversight of implementation.
- Assign clear senior ownership for each recommendation.
- Approve implementation products and revised operational arrangements.
- Monitor milestones, dependencies, risks and issues.
- Challenge whether actions address the substance and intended outcome of the Review's recommendations rather than simply procedural compliance.
- Commission testing or other assurance where necessary.
- Approve recommendations for closure, subject to appropriate assurance.
- Oversee reporting through the Department's formal governance arrangements.

4. Departmental Oversight and Reporting

There will be proactive departmental oversight of progress in implementing the recommendations and action plan, with regular reports being provided to the Minister. The independently chaired Departmental Audit & Risk Assurance Committee will challenge and scrutinise progress and provide assurance to the Departmental Accounting Officer that actions are being implemented and progress sustained. .

5. Public Reporting

The Department will publish regular updates on delivery. These will identify completed actions, actions in progress, revised timescales where necessary, assurance findings and decisions. Where an action cannot be completed to the original timetable, the reason, interim mitigation and revised date will be reported.

6. Appendix A Proposals

The Department also welcomes the wider strategic proposals set out in Appendix A of the Review. As noted by the reviewer in his report, these extend beyond the

Review's formal Terms of Reference and include potentially significant legal, policy and legislative reforms. The Department will undertake a structured policy and legal assessment of these proposals, including their operational, financial, human-rights and stakeholder implications, before providing advice to the Minister on potential next steps

7. Closure & Assurance

The Department will not regard a recommendation as complete solely because a revised policy, procedure or guidance document has been produced. Closure will require proportionate evidence that the intended improvement has been implemented, communicated and, where appropriate, tested and embedded in operational practice.

Following implementation, the Department will undertake a formal assurance exercise to assess whether the new arrangements have been effectively embedded. This will include appropriate operational testing and a review of the evidence supporting closure of each recommendation. The outcome will be reported through the Department's governance arrangements

Departmental Commitment

DAERA is committed to ensuring that future statutory animal-welfare interventions are supported by clear accountability, robust governance, proportionate decision-making, high standards of animal welfare, effective operational controls and appropriate consideration of their impact on local communities. Implementation will be overseen at senior level and will be subject to formal assurance. Recommendations will not be regarded as complete until the relevant changes have been implemented, tested and evidenced in practice.