**Summary of consultation responses to The Scrapie (Fees) (Amendment) Regulations (NI) 2016**

Two options have been identified:

**Option 1: Do Nothing**

* This option means that fees for SMFS membership would continue to be charged at the level as set out in the Scrapie (Fees) (Amendment) Regulations (Northern Ireland) 2013. As a result, the fees would not reflect the actual costs incurred by DARD in providing this service.
* This option is not considered feasible as it does not deliver on full cost recovery as required of DARD by government policy.

**Option 2: Introduce new legislation with revised fees set at a level to ensure full cost recovery (preferred option)**

* This option enables DARD to update the SMFS fees to reflect the costs incurred in providing inspection, audit and administrative services relating to the operation of the Scheme.
* This option allows DARD to achieve full cost recovery from the date new fees legislation (which is required to make provision for the amendment of the fees) comes into operation.

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| Date | **Received From** | **Comments** | **DARD Response** |
| 14 Jan 2016 | The Ulster Farmers’ Union (UFU) | The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland representing over 11,500 farming families and as such, we would like to make the following comments;  The members of the UFU believe that the ongoing Scrapie monitoring program is important for the Northern Ireland sheep industry in order to maintain a high flock health status. Given that fees have not been amended since 2013, we accept that a review of the current fee structure is required in order to allow DARD to achieve full cost recovery. The committee would however like to request a breakdown for the proposed cost increases in order to ascertain if all of the increases can be justified. To the knowledge of the committee, UK inflation has increased by 2%, 0.5% and 0.1% per year since the beginning of 2013. In light of this, the proposed fee increases of 12.4% for the cost of the initial inspection and 23.2% in the annual flock audit and membership fee appears to be excessive.  In addition to this, to the members’ knowledge, the prevalence of Scrapie in Northern Ireland is considered to be low. As such, the UFU believes that DARD should investigate the possibility of deregulating scrapie controls rather than increase the costs of the current monitoring scheme. The membership believes that given the perceived low incidence of Scrapie, DARD should look to move the annual audit process to a biennial audit. Furthermore, the membership believes that DARD should also investigate the possibility to work cooperatively with ROI on an all Ireland Scrapie plan in order to improve trade and accessibility of alternative genetic lines for the industry. | DARD is obliged, under Government policy agreement (Managing Public Money in NI – MPMNI) with the Department of Finance and Personnel (DFP), to recover the full costs of these services. Following a revision of the Scrapie Flock Monitoring Scheme (SFMS), which now operates on a two tier basis, the need for additional time spent in respect of administering the scheme has contributed to the overall % rise in costs to members. The fees have been amended to levels that reflect the full costs to the Department.  DARD officials liaised closely with their DAFM counterparts when designing the revised SFMS to ensure the systems were as similar and compatible as possible. Whilst membership of the scheme is voluntary, it is an EU requirement that anyone seeking to move or trade sheep with other Member States must be a member of such a scheme. |
| 19 Jan 2016 | The Young Farmers’ Clubs of Ulster | After extensive consultation with our members I would like to inform you that the Young Farmers’ Clubs of Ulster is in line with that which you have received from the Ulster Farmers Union.  We do however have one additional point - that it would be more appropriate to charge fees that are in relation to flock size. It will be more uneconomical to small breeders who may only have a few animals travelling within the EU each year, yet they may need it to enter certain export sales to be eligible for any potential export business. | DARD is obliged, under Government policy agreement (Managing Public Money in NI – MPMNI) with the Department of Finance and Personnel (DFP), to recover the full costs of these services. Following a revision of the Scrapie Flock Monitoring Scheme (SFMS), which now operates on a two tier basis, the need for additional time spent in respect of administering the scheme has contributed to the overall % rise in costs to members. The fees have been amended to levels that reflect the full costs to the Department.  DARD officials liaised closely with their DAFM counterparts when designing the revised SFMS to ensure the systems were as similar and compatible as possible. Whilst membership of the scheme is voluntary, it is an EU requirement that anyone seeking to move or trade sheep with other Member States must be a member of such a scheme.  In respect of the point regarding flock size, operating a charging regime where each flock owner is individually invoiced based on the size of their flock could greatly increase the costs of administering the scheme. While this could be mitigated by ‘banding’ flocks into various groups of size, it was felt better to maintain uniformity in respect of membership fees when the scheme was designed. This approach is in line with schemes operated in Britain, and reduces overall costs of operating the scheme. |
| 14 Jan 2016 | Northern Ireland Texel Sheep Breeders Club | The committee of the Northern Ireland Texel Sheepbreeder’s Club which would have a large contingent of our membership in the Scrapie Monitored Scheme have discussed the proposed increase in fees and can see no justification for this at a time when farm incomes are under pressure. Many in our membership are already pulling out of other schemes due to the cost and we feel if this increase does go through it could result in some of our membership deciding that it is no longer feasible to continue their membership in the Scrapie Monitored Scheme, furthermore the cost is extremely prohibitive for anyone wishing to join the scheme which surely you should be encouraging to promote exports. | DARD is obliged, under Government policy agreement (Managing Public Money in NI – MPMNI) with the Department of Finance and Personnel (DFP), to recover the full costs of these services. Following a revision of the Scrapie Flock Monitoring Scheme (SFMS), which now operates on a two tier basis, the need for additional time spent in respect of administering the scheme has contributed to the overall % rise in costs to members. The fees have been amended to levels that reflect the full costs to the Department. |
| 18 Jan 2016 | The Northern Ireland Charollais Sheep Club | As breeders, we think that an increase of such proportions is much too excessive. Yes we appreciate that there has been no increase since 2013, but to propose such a leap - 24 %. The agricultural industry is very much in recession in all sectors and not able to sustain increases of this proportion.  We are of the opinion that a modest increase in line with inflation would be much more appropriate. | DARD is obliged, under Government policy agreement (Managing Public Money in NI – MPMNI) with the Department of Finance and Personnel (DFP), to recover the full costs of these services. Following a revision of the Scrapie Flock Monitoring Scheme (SFMS), which now operates on a two tier basis, the need for additional time spent in respect of administering the scheme has contributed to the overall % rise in costs to members. The fees have been amended to levels that reflect the full costs to the Department. |
| 19 Jan 2016 | The British Veterinary Association | |  | | --- | | The BVA is the national representative body for the veterinary profession in the United Kingdom and has over 15,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters | | The BVA’s Northern Ireland Branch brings together representatives of local veterinary associations, BVA's specialist divisions, government, and research organisations in Northern Ireland. The Branch advises BVA on the consensus view of the Northern Ireland members on local and United Kingdom issues. We have also consulted directly with specialist division the Sheep Veterinary Society.  We understand that current membership fees for the Northern Ireland Scrapie Monitored Flocks Scheme (SMFS) were set in 2013, these have been reviewed in light of increased staff costs and it is now necessary, in accordance with government policy, to introduce a new fees schedule to enable DARD to achieve full cost recovery for services provided. We support the proposal to increase fees to full cost recovery as the services listed relate to requirements that allow for commercial enterprise activities. However, if the industry is to pay the full cost for services, they should rightly expect to pay for an efficient high value service, priced accordingly. It is therefore essential that there is full transparency of fee setting to include overheads and an audit of efficient process. This will ensure the value of the service and cost-effective delivery and will engender buy-in. For effective disease control, and good Government/vet/farmer relations the income must be retained for the benefit of the Scheme. | | DARD is required to operate the Scrapie Flock Monitoring Scheme (SFMS Scheme) to EU standards and the Department, within its Corporate Governance arrangements, obtains assurance in several ways to ensure that the standards required are being met. Additionally DARD is obliged, under Government policy agreement (Managing Public Money in NI – MPMNI) with the Department of Finance and Personnel (DFP), to recover the full costs of these services. There is no profit generated and therefore no additional income to be reinvested for the benefit of scheme members. |