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From the Director General Animal Health & Welfare  
and Chief Veterinary Officer  
Dr Debby Reynolds BVSc PhD MRCVS

Dr Caroline Lucas  
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CVO/769

6 June 2006

*Dear Dr Lucas*

Thank you for your letter of 26 April regarding avian influenza.

Defra will deal with any outbreaks of avian influenza in accordance with the Exotic Animal Disease Generic Contingency Plan, which has been used successfully against the outbreak of H7N3 in Norfolk, and an outbreak of Newcastle Disease last year. Our disease control strategy is to cull all birds on any premises which become infected with avian influenza and their dangerous contacts in order to stop the spread of disease. We do not intend to cull birds on other premises, unless a veterinary risk assessment of the disease control situation indicates it is necessary.

We will also impose proportionate restrictions in zones around infected premises in line with European legislation. If there is an outbreak of avian influenza in the UK there should be no need for people to stop visiting the countryside. Any decision to close land over which there is a public right of way, or where there is public open space or access to open country, would be taken only when it is required for disease control and only in the immediate area of high risk.

In advance of an outbreak, we urge poultry keepers to maintain a high standard of biosecurity, to separate their poultry from wild birds where possible, and to be vigilant for any signs of disease. We believe that vaccination of poultry is not the most effective defence against avian influenza, because currently available vaccines have a number of disadvantages:

- Although currently available vaccines are able to reduce mortality, it is likely that some vaccinated birds would still be capable of transmitting the disease if they become infected, but might not display symptoms of disease. This would increase the time taken to detect and eradicate the virus.
- Influenza viruses can mutate rapidly, which could render a vaccine less useful.



INVESTOR IN PEOPLE



- The vaccines have serious practical limitations in that they need to be delivered by individually injecting each bird. It can take up to three weeks for the birds to develop optimum protective immunity and some poultry require two doses.
- The vaccine has not been shown to be effective in species such as ducks, geese and turkeys.
- It is difficult to differentiate infected from vaccinated birds.
- There are welfare implications for birds through increased handling, especially when speed is necessary.
- Vaccination may induce a false sense of security, resulting in a relaxation of biosecurity and vigilance.
- There will be a risk to workers from increased handling of birds.

However, I would like to stress that we do not have any objection in principle to the use of vaccination generally, or specifically in relation to avian influenza. We keep our policy on vaccination under review in the light of scientific developments in vaccines. Preventive vaccination is used by the industry for Newcastle Disease and would be considered as part of the control programme in an FMD outbreak. We continue to work closely with vaccine manufacturers to assess information on other vaccines.

Defra has issued specific guidance for zoos on the biosecurity measures that will protect their birds from avian influenza. We have also planned for a possible preventive vaccination programme against avian influenza for zoo birds in the UK, for conservation purposes. This will be based on a veterinary risk assessment. As part of our planning, we have obtained 2.3 million doses of vaccine as a contingency reserve for zoo birds. These are now ready for use, should a risk assessment indicate it is necessary.

I agree that any culling of birds to control an outbreak of avian influenza should be undertaken swiftly, efficiently and humanely. This action is a central pillar of our response to any such outbreak. I recently published an open letter in which I re-stated my commitment to ensuring that any culling of birds be undertaken to high standards of welfare and humanely, using techniques that are compliant with EU legislation and OIE codes. All killing will be undertaken by trained and competent staff, under the close supervision of veterinary officers of the State Veterinary Service. An audit of the slaughter operation, that includes an assessment of the efficiency and welfare of the cull, is undertaken on all premises where culling for disease control is required. The audit is fed back to central veterinary authorities in order that any problems might be identified and rapidly addressed.

This Government is committed to high standards of farm animal welfare. Indeed, we have, in Great Britain, some of the strictest legislation in the EU to protect the welfare of farmed animals. The Agriculture (Miscellaneous Provisions) Act 1968 makes it an offence to cause or allow unnecessary pain or distress to livestock and the Welfare of Farmed Animals (England) Regulations 2000 (as amended) lay down requirements in respect of general welfare, inspection, housing and feeding for all farmed animals. This legislation would continue to apply in the event of a need to house birds for disease control purposes. We have already issued guidance on housing birds in the event of a such a requirement in our leaflet 'Avian influenza - Separating flocks from wild birds', which is available on the Defra website at [www.defra.gov.uk/animalh/diseases/notifiable/disease/ai/keptbirds](http://www.defra.gov.uk/animalh/diseases/notifiable/disease/ai/keptbirds). The guidance advises keepers to be vigilant for feather pecking and cannibalism, avoid too

high a stocking density, provide fresh litter and clean water etc. to ensure the continued welfare of the birds.

We are aware that low pathogenic avian influenza exists in wild birds and that it has been known to spill over into commercial poultry holdings, through direct contact. I would be interested to see your evidence that industrialized farming is responsible for the mutation of low pathogenic avian influenza into the highly pathogenic H5N1 strain. We will continue to work very closely with the poultry industry and many other stakeholders in the task of reducing the threat of avian influenza and managing it effectively where it is detected.

On the question of disease spreading by trade routes or migration birds both are possible and are considered in our risk assessments on disease spread which are regularly update. Copies can be found on our website:

<http://www.defra.gov.uk/animalh/diseases/monitoring/index.htm> .

Yours sincerely

A handwritten signature in black ink that reads "Debby Reynolds". The signature is written in a cursive, flowing style.

**DEBBY REYNOLDS**