

Final Business and Regulatory Impact Assessment

Title of Proposal

The Bovine Viral Diarrhoea (Scotland) Amendment (No 2) Order 2013

Final and Implementation stage Business and Regulatory Impact Assessment for measures to reduce the spread of Bovine Viral Diarrhoea (BVD) infection in cattle.

1. Purpose and intended effect

1.1 Objective

1.1.1 The purpose of the proposed legislation is to reduce the spread of Bovine Viral Diarrhoea (BVD) in cattle, as part of a plan to eradicate BVD from Scotland. The proposed legislation is the next stage of BVD eradication, following with The Bovine Viral Diarrhoea (Scotland) Order 2012 for compulsory BVD testing by 1st February 2013, and is under the Animal Health Act (1981).

1.2 Background

1.2.1 From the 1st February 2012, under The Bovine Viral Diarrhoea (Scotland) Order 2012, there has been a legal requirement for all cattle farmers with breeding herds, to screen their herd for BVD, before the 1st Feb 2013. The knowledge of BVD status should raise awareness of BVD, and encourage eradication.

1.2.2 To eradicate BVD from a herd, the removal of Persistently Infected cattle (PIs) is essential. PIs contract BVD in the first 3 months of gestation, and never become immune to the disease. PIs shed large quantities of the virus throughout their lives, causing transient infection in other cattle, and if a pregnant cow becomes infected, it causes abortions or creates new PIs. Therefore, to reduce the number of PIs being created and to reduce the spread of infection, PIs must be removed from the system.

1.2.3 The scheme is in four stages, of which this Order constitutes Stage 3: Control Measures - reducing the spread of infection. A further BRIA will be produced for stage four.

Stage One: Subsidised screening (September 2010 to April 2011)

The Scottish Government provided £36 towards testing for BVD for each herd, and a further £72 towards further testing or veterinary advice if the result was positive. Around 4,000 herds took advantage, at a cost of £180,000.

Stage Two: Mandatory Annual Screening

All keepers of breeding herds are required to screen their herds for BVD by 1st February 2013, and annually thereafter. A range of testing methods is available. Also, where there are calves born in non-breeding herds, they must be tested within 40 days.

Stage Three: Control Measures - reducing the spread of infection

It is aimed to introduce the following control measures from 01 January 2014:

1. To apply movement restrictions/prohibitions to any animal confirmed as infected with BVD;
2. Require the keeper to notify the current BVD finding prior to movement of any breeding herd/animal;
3. To apply movement restrictions/prohibitions to herds/animals during any period where there has been a failure to comply with sampling and testing obligations.

Stage Four: Enhanced Testing and Biosecurity Controls

From a date to be decided (likely to be end 2014) movement restrictions/enhanced testing requirements on herds that are not free of BVD (not negative herds). Also herds that have a persistent BVD problem that goes unchecked may be required to increase biosecurity measures.

1.3 Rationale for Government intervention

1.3.1 The Scottish Government BVD eradication programme contributes to the following national outcomes:-

- Greener – “We value and enjoy our built and natural environment and protect it and enhance it for future generations” by reducing calf mortality and infertility in beef and dairy herds.
- Greener - “We reduce the local and global environmental impact of our consumption and production” by reducing emissions from livestock production.
- Wealthier and Fairer – “We live in a Scotland that is the most attractive place for doing business in Europe” by improving the reputation of the Scottish cattle industry, and the confidence for international trade and in the process making potential savings of £50-80 million over 10 years to the Scottish Cattle Industry.

1.3.2 The BVD eradication scheme is industry led, as industry leaders asked the government to enforce control measures.

1.3.4 Voluntary schemes in the past have had limited success, such as in Orkney and Somerset. Voluntary schemes often do not lead to complete eradication, as some farmers may not comply with the full measures necessary, leaving a reserve of BVD to re-infect the wider cattle population.

1.3.5 Currently, the punishment for breaking the BVD Scotland Order 2013 comes under the Animal Welfare Act (1981), which has a maximum penalty of £5000 and a 6 month jail sentence. Instead, it has been proposed to enforce this policy by movement restrictions, which should make it increasingly uncomfortable for farmers who do not comply with the Order.

2. Consultation

2.1 Within Government

Animal Health and Welfare Division – meetings with relevant policy makers about

strategy and organisation.

Rural Science and Analysis Unit (RESAS) – Economists produced “an analysis of the effects of BVD eradication in Scotland: a farm business level impact assessment”.

ScotEID - Scottish Agricultural Organisation Society (SAOS), who operate the wider ScotEID project on behalf of Scottish Minister, were consulted to ensure we could create a national BVD database that could help fulfil our policy aims. The database went live with its 1st phase on 18th June 2013.

BVD National Advisory Group – to assist with the BVD eradication programme a BVD National Advisory Group has been set up. Membership comprises Government officials, veterinary professionals, laboratories, AHVLA, and Industry organisations (IAAS and NFUS). This group advises on all aspects of the BVD eradication programme.

2.2 Public Consultation

2.2.1 A BVD policy team consulted many potentially affected bodies, to create effective policies and plan of action to reduce the spread of BVD. A formal consultation on these control measures was launched on the 18th May 2012 and closed on the 18th August 2012. It was sent directly to over 400 interested bodies and we received 48 responses. The final measures to be introduced takes account of the responses received, of which a summary can be found at -

<http://www.scotland.gov.uk/Topics/farmingrural/Agriculture/animal-welfare/Diseases/disease/bvd/eradication/consultation>

2.2.2 Advice from market leaders were paid special attention, as they would be crucial in the implementation of proposed regulations, for declaring cattle at sale, and ensuring BVD statuses are correct.

2.2.3 The effectiveness of the policies, to reduce the spread of BVD, were consulted with leading BVD and epidemiological scientists, including Prof. Joe Brownlie (Royal Veterinary College), Peter Nettleton (Moredun), George Caldwell (Scottish Rural College (SRUC), and George Gunn (SRUC).

2.2.4 Nigel Miller, the president of the National Farmers Union Scotland, was consulted about impact legislation would have on farmers, as were 6 individual farmers – see section 2.3.1

2.2.5 The BVD eradication scheme has been presented at about 60 BVD events across Scotland to almost 2000 farmers and vets, face to face.

2.3 Business

2.3.1 Six cattle farmers were interviewed to assess how the proposed regulations would affect their businesses.

Locations: Aberdeenshire, Galloway, Thurso, Borders, West Kilbride, Lanark

Size of herd: Between 85 – 330

Types of herds: 3 Dairy, 3 Beef

Herd Status: All negative herds negative: 2 with past exposure, 2 with past severe infection, 2 with naïve herd (no past exposure to BVD).

The majority (5 out of 6) were in favour of the proposed measures. Section 3.2 provides further specific details.

3. Options

3.1 Sectors and groups affected

The sector primarily affected is breeding cattle farmers, as their trading may be restricted. A number of other sectors will also be affected by the implementation of the restrictions, testing, law enforcement, and the potential increase in production and health in cattle.

The following people may be affected by the proposals

- Cattle farmers in Scotland
- Agricultural workers
- Beef traders
- Dairy traders
- Approved labs
- Cattle trading markets
- Consumers
- SAOS maintaining the BVD database
- Sheep Farmers
- Cattle farmers in the rest of the UK
- Vets
- Pharmaceutical companies producing antibiotics
- Local authorities
- Cattle trading markets

3.2 Options

3.2.1 Option 1: Do Nothing

No action.

Benefits

There would be no need for any legislation. No action will be required of markets to check every BVD status before sale. Farmers free of BVD could have competitive advantage, and a premium price at market. Farmers with a 'not-negative' status will not need to bear the costs to eradicate BVD to continue normal trade.

Costs

If PIs (Persistently Infected animals) and 'not-negative' herds are allowed to move freely, and the trade of infected animals is allowed to continue, it is likely that BVD will continue to spread, which could cost the Scottish Cattle industry £50-80 million over ten years. The introduction, or reinfection, of BVD into naïve (unvaccinated) herds, is likely to cause large productivity losses and increase the costs of BVD eradication, as eradication may be required multiple times. The potential increase in cost and action required to keep a 'negative' BVD status, could reduce the morale among farmers and industry, and total

BVD eradication would be unlikely. Voluntary schemes in Somerset (Booth & Brownlie, 2011¹), and Orkney (Truyers *et al.*, 2012²), were not effective in eradicating BVD, as there was not full participation, and therefore a reservoir of BVD was left to re-infect healthy herds.

3.2.2 Option 2: Introduce Control Measures (full package) –

This would introduce the following control measures at the same time -

- 1) movement restrictions/prohibitions to any animal confirmed as infected with BVD;
- 2) require the keeper to notify the current BVD finding prior to movement of any breeding herd/animal;
- 3) movement restrictions/prohibitions to herds/animals during any period where there has been a failure to comply with sampling and testing obligations.

3.2.2.1 Movement restrictions/prohibitions to any animal confirmed as infected with BVD

General impact

PI cattle are known to be a reservoir of BVD virus, and continue to shed high volumes of BVD virus throughout their lives, infecting cattle in close proximity.

Benefits

BVD positive animals would be removed from the farming system, taking away the main source of infection. Removing these PIs will dramatically reduce the number of PIs created and reduce the chance of buying a PI animal, which should reduce the spread of BVD. Removing PIs will stop transient infections within herds, and could save £37 per animal per annum (Gunn, *et al.*, 2004³).

Costs

If a PI is too unhealthy to go to slaughter, the cost of animal disposal is £70 per head. If a PI animal goes to slaughter, the loss in sale value for sending the animal at a younger age is £400-500. However the loss is only for PI calves which had the potential to be healthy and reach normal weight, but many would grow poorly. Long term benefits for removing PIs would be far greater than short term costs, as PI removal has been shown to reduce calf mortality and improve herd health. As such, there would be more meat or milk to sell.

Detailed impact (derived from interviews with the six famers as mentioned in section 2.3.1)

Main Benefits Identified

- All identified the proposal as a good thing, except one who was not affected.
- If a PI is sold it could ruin another herd, so it could only be a good thing to ban

¹ Booth, R. E. & Brownlie, J., 2011. Establishing a pilot bovine viral diarrhoea virus eradication scheme in Somerset. *Veterinary Record*, 170(3).

² Tuyers, I. G. R. *et al.*, 2012. Eradication programme for bovine viral diarrhoea virus in Orkney 2001 to 2008. *Veterinary Record*, 167(15), pp. 566-570.

³ Gunn, G. J., Stott, A. W. & Humphrey, R. W., 2004. Modelling and costing BVD outbreaks in beef herds. *The Veterinary Journal*, 167(2), pp. 143-149.

their movement.

- Reduce the risk of buying a PI and bringing BVD into a clean herd
- Improve herd health and reduce medical (antibiotic) bills.
- Benefit business in the long term.
- It will speed up the process of eradicating BVD.

Likely Level of Costs

Only short term costs, a PI not going to slaughter would cost £70 for disposal. There would be a loss in value of about £400-500 from selling the meat of a PI at a younger age. However most identified this as more of an investment than a cost, with positive financial implication in the long term.

All but one interviewee said the costs would be less than 1% of turnover.

Competitiveness

Most would find it a positive effect for competitiveness. Due to the increased awareness of BVD, people in Scotland and abroad are wary of buying animals with an unknown BVD status. It will improve the Scottish brand, and increase the potential trade with other countries.

The only disadvantage identified was that it may be more difficult or complicated to replace stock, but farmers would much rather not buy a PI.

Effectiveness

All interviewees thought it would be very effective, if everyone follows the rules and it is policed properly. It will force people to get rid of BVD and stop cross infection.

Other Points Raised

- Interviewees thought it was a good policy, but would like to see it in place immediately, or as soon as possible.
- Most interviewees thought SG needed to promote the financial benefits more, and to make farmers see that it is for the benefit of industry to get rid of PIs, not just another cost imposed on them.
- Interviewees wanted more clarity about the future of the eradication scheme, the time scale and regulations were not clear to them. The confusion is said to cause some farmers to think the government is not serious, and will only act once they are forced, or if their business is affected.
- One interviewee could not see any benefit of the policy, because he operates a closed herd, and sends all cattle to slaughter, so he is not at risk of buying or selling a PI, but has incurred a lot of costs looking for a PI.

3.2.2.2 Require the keeper to notify the current BVD finding prior to movement of any breeding herd/animal

General Impact

At present, only some cattle coming onto the market are of known BVD status, making it difficult for farmers to source BVD-free cattle. The proposal is to make it compulsory for all breeding herds to declare BVD status before it moves as either 'negative' or 'not negative' in line with the requirements to declare a status under the Bovine Viral Diarrhoea (Scotland) Order 2013.

This information (BVD status) will be readily available from the national BVD database.

Benefits

The main benefits are that farmers will know what they are buying, and the likelihood of bringing in disease. This system will give recognition to farmers for proactively staying BVD free, and having good herd health. If a premium for BVD free cattle is created, it should encourage farmers with a 'not-negative' status to eradicate BVD to change their status. It may also encourage more farmers to join a Cattle Health Certification Standard (CHeCS) scheme, or virus test all cattle, to improve sales.

Costs

Minor costs for famers/keepers/markets to check database, and find herd/animal BVD status.

Keepers may decide to voluntary take action to change the status of their herd from not negative to negative should they wish as it is possible that sales and value of cattle could be affected at market if purchasers wish to buy from negative only herds, or individually negative tested animals.

To achieve the lowest risk status farmers may (not compulsory) either join a CHeCS scheme, or antigen (virus) test the whole herd. To join a CHeCS BVD scheme costs £30-£60 (BioBest HiHealth Herd Care, Cattle Health Scheme.), and they normally include veterinary advice and reduced testing charges. Blood tests are around £4.40, and around £3.15 lab fees per test (BioBest). To individually blood test each animal for virus, outside a Cattle Health Scheme, it costs around £9 to ear tag and test each animal, no vet required. There is also the option of vaccinating which currently costs £2.55 per animal (Bovidec). Vaccination is required twice in the first year, and then an annual booster every year.

Detailed impact (derived from interviews with the six famers as mentioned in section 2.3.1)

Main Benefits Identified

- Farmers with BVD free herds said they could sell cattle at a premium price.
- BVD free farmers can sell more cattle.
- It will give recognition to farmers at the forefront of herd health.
- It will be easier finding BVD free stock, and know what you are buying in.
- Stop people buying in BVD infected cattle unknowingly.
- It will raise awareness of BVD eradication, and bring the reality of BVD to slow moving farmers.
- Net benefits will be huge for the market.
- It will be more efficient for industry to have less BVD, for productivity, fertility,

still births, calf mortality etc.

Likely Level of Costs

- All interviewees identified it as less than 1% of turnover, except one who said it depended on the number of blood tests and vaccines required to keep a 'negative' status.
- Farmers that wanted to move to lowest risk status may choose to join an accredited Cattle Health Scheme, or carry out virus blood tests on all cattle. But this initial cost would only be minor, and beneficiary in the long term, especially if they get a premium at sale.

Competitiveness

All traders thought this regulation would improve their competitiveness, both within and outside Scotland, except one who does not sell his cattle so would see no great advantage or disadvantage. It will help to compete with a BVD free herd, and will give an early market advantage to proactive farmers. Some traders said they do not take their cattle to mixed market sales, and instead trade directly with buyers requiring BVD free animals. These sales can improve their competitiveness, as they incur fewer costs, and it reduces risk of contracting diseases at market.

A major disadvantage is the mixing of animals at market with different BVD statuses, which increases the risk of spreading BVD infection from 'not-negative' herds to 'negative' herds. Other disadvantages identified were risk of harming cattle while rehandling, and the minor costs to keep a 'negative' BVD status, particularly for farmers with neighbours with BVD.

Effectiveness

Most said it would be effective and it was a step in the right direction for BVD eradication, but industry will only be proactive if they can see clear benefits. However, there would still be a risk of reinfection at market, and BVD will not go away until there is a complete ban in movement of 'not-negative' herds.

Other Points Raised

- Suggestion to give financial help for tests to farmers with a BVD screen result 'not-negative', although most interviewees said the cost was minor and there had to be some industry buy-in to make it work.
- The only way to be safe at markets would be to have BVD free days, with clean lorries, clean premises, and not to mix diseased cows with clean ones.

3.2.2.3 To apply movement restrictions/prohibitions to herds/animals during any period where there has been a failure to comply with sampling and testing obligations.

General Impacts

The new BVD amendment order seeks to place [temporary] restrictions on the

movements of animals from breeding herd or a breeding bovine animal that fails to carry out the testing obligations of the 2013 order. The restriction would stay in place until the keeper of the animal/s carried out the appropriate testing and received a BVD status/finding. Whilst the restriction is in place animals would be permitted to move direct to slaughter.

Benefits

The main means by which we intend to significantly reduce BVD prevalence is through using market forces whereby there will be price difference between cattle from negative and not negative herds. Therefore in order for market forces to work, it is vital that BVD findings/status is known – farmers should be able to know the BVD status of the individual animal or the herd of any cattle they buy.

Accordingly it would be unfair on those who had complied with the testing obligations, if someone who had not was able to move animals on a 'not known status'. The restriction provision therefore further encourages keepers to comply with their obligations to obtain a BVD finding/status, in order for the wider market to better assess the risk of BVD prevalence when purchasing cattle.

Costs

Compliance with existing statutory requirements under the 2013 Order will remove the temporary restriction. In addition animals will still be able to move direct to slaughter houses.

Detailed impact (derived from interviews with the six famers as mentioned in section 2.3.1)

Main Benefits Identified

- Good from a financial point of view for the proactive farmers and those that carry out their statutory duties
- Movement bans will isolate potential/unknown BVD, therefore protecting BVD free herds.

Likely Level of Costs

Compliance – testing requirements – is already a statutory requirement and therefore there are no additional costs. Movement restriction/prohibition is simply an action as a result of non-compliance.

Competitiveness & Effectiveness

Proportionality test (other types of control measures considered)

Whilst direct prosecution is an important 'end of the road' option for those failing to continually meet their statutory obligations it is not the most appropriate tool for addressing the failure to carry out the test. Restrictions are seen as a more proportionate response –

- It is simple for farmers to get out of (a keeper could comply with the testing requirements in a matter of days should they choose to),
- Criminal sanctions are considered as a less effective means of enforcement as opposed to the use of market forces to change the behaviour of farmers
- It allows for prosecution to be considered for more serious breaches

4. Scottish Firms Impact Test

4.1 To understand the impact the regulations could have on business, six farmers were interviewed about the policies. These businesses included large and small, three dairy and three beef herds, from a wide geographical distribution across Scotland. The interviews were carried out with the following businesses (business name, farmers name, location, size and type of herd):

- Titaboutie, Peter Robertson, Aberdeenshire, 160 Beef
- Alternall lyth, Donald Henderson & Son, Thurso, 200 Beef
- Rumbleton, William Barrie, Borders, >200 Beef
- Cream o Galloway, David Finlay, Galloway, 85 Dairy
- Low Ballees Farm, Tom Campbell, West Kilbride, 100 Dairy
- Hillend, William Fleming, Lanark, 330 Dairy

All interviews were carried out face to face, except for Titaboutie, which was a written questionnaire. For outcomes of the interviews, see **Section 3.2**. Specific case studies can also be found at the following –

<http://www.scotland.gov.uk/Topics/farmingrural/Agriculture/animal-welfare/Diseases/disease/bvd/bvd-case-studies-2013>

4.2 Competition Assessment

As well as assessing the impact on individual firms we have also considered the impact that the policy might have in competition between firms by applying the four OFT competition filters questions –

- 1) Will the proposal directly limit the number or range of suppliers? e.g. will it award exclusive rights to a supplier or create closed procurement or licensing programmes?
- 2) Will the proposal indirectly limit the number or range of suppliers? e.g. will it raise costs to smaller entrants relative to larger existing suppliers?
- 3) Will the proposal limit the ability of suppliers to compete? e.g. will it reduce the channels suppliers can use or geographic area they can operate in?
- 4) Will the proposal reduce suppliers' incentives to compete vigorously? e.g. will it encourage or enable the exchange of information on prices, costs, sales or outputs between suppliers?

For all four questions the answer is no. Whilst the overall policy should create a competitive advantage to BVD free herds within and outside Scotland with a premium for

BVD free animals and animals from BVD free herds likely to emerge, it does not have an impact on competition.

4.3 Test run of business forms

There are no new business forms proposed.

5. Legal Aid Impact Test

It is not anticipated that there will be more than a handful of prosecutions and therefore there will be limited impact on the legal aid fund. We intend to enforce the legislation through criminal prosecutions, under the Animal Health Act (1981), with sanctions up to £5000 fine, and six months in jail.

SG colleagues in Access to Justice have been consulted and agree with this statement.

6. Enforcement, sanctions and monitoring

The penalty for breaking the BVD Scotland Amendment (No 2) Order 2013 comes under the Animal Welfare Act (1981), which has a maximum penalty of £5000 and a 6 month jail sentence.

The Scottish Agricultural Organisation Society (SAOS) will update and monitor the BVD database, containing all breeding herds BVD status's, and cattle movements. The BVD database will be available for markets to check herd status's before sale. If any illegal movements are made local authorities will be responsible for prosecuting offenders.

7. Implementation and delivery plan

1. To apply movement restrictions/prohibitions to any animal confirmed as infected with BVD;

The intention is to restrict the movement of BVD positive animals from the 1st January 2014. This measure is designed to reduce the spread of infection.

2. Require the keeper to notify the current BVD finding prior to movement of any breeding herd/animal;

Herd declarations will be required to make herd declarations compulsory from 1st January 2014 to assist with winter markets movements

3. To apply movement restrictions/prohibitions to herds/animals during any period where there has been a failure to comply with sampling and testing obligations;

The intention is to restrict movements from untested herds/animals from 1st January 2014 to prevent the spread of BVD and encourage farmers to eradicate the disease.

Timeline

2009-10	Industry-led group developed proposals on national BVD eradication scheme
April - July 2010	Consultation on general principles
22nd September 2010	Launch of BVD eradication scheme
Sept 2010 – April 2011	Subsidised screening available
January – April 2011	Consultation on mandatory annual screening

May 2011	Announcement that mandatory annual screening to go ahead
September 2011	Consultation on permitting ear tissue tagging
1st December 2011	Tests permitted from this date for mandatory annual screening
January 2012	Ear tissue tag legislation passed affirm. res.
February 2012	Guidance on mandatory annual screening sent to all cattle keepers and vets
2nd March 2012	BVD Scotland Order 2012 signed
1st April 2012	BVD Scotland Order 2012 came into force
May – July 2012	Consultation on Control Measures
8th January 2013	BVD Scotland Order 2013a to be signed
8th February 2013	BVD Scotland Order 2013a came into force
30th July 2013	European Technical Standards obtained
22nd November 2013	BVD Scotland Amendment (No 2) Order 2013 to be signed and laid in Scottish Parliament
1st January 2014	Control Measures to come into force

7.1 Post-implementation review

SAOS, via ScotEID database system, have built a BVD database to record and monitor BVD statuses. This will be regularly updated from the information made in the annual declarations. The database will provide information for monitoring illegal herd and positive BVD animal movements, and analysing how prevalence of BVD changes over time, and across Scotland.

Progress of the eradication scheme and stakeholders progress will be reviewed in the future, and any necessary modifications made. If prevalence does not significantly reduce in the next three years, discussions will be required with stakeholders as to whether to move to more stringent measures, or remove testing requirements.

8. Summary and recommendation

Option 1, leaving farmers to eradicate BVD voluntarily is not likely to be effective in eradicating BVD. To continue with the eradication programme it will require **Option 2** to reduce the spread of infection, by stopping the movement of BVD positive animals, declaring BVD status at the point of movement and preventing animals moving from untested herds.

As such, **Option 2 is recommended** as these measures are seen to be critical in preventing the spread of BVD. The long term financial and health benefits far outweigh the cost of implementation. To help ensure that the winter markets will be as least disrupted as possible the control measures will come into force from 01 January 2014.

8.1 Summary costs and benefits table

	Benefits	Costs
Option 1	No action required of SG or markets to monitor BVD statuses.	As seen in Orkney, eradication without legislation is unlikely to be effective. Higher costs for those maintaining a BVD free status. Costs to herds suffering from BVD.
Option 2	Removing positive BVD animals from the market will remove the source and reduce the spread of	Costs for PI disposal £70, or reduced value in younger slaughter date £400-500 per animal. However, this is

	<p>infection. Removal could save farms £30-37/cow/year in production losses. Average dairy and beef farmers could benefit by £15,800 and £2,400 per year respectively.</p> <p>People will know the disease status of the cattle they are buying. It will increase awareness and encourage farmers to eradicate BVD - to move herds into low risk Categories, to improve business. BVD free herds may get a premium, and more sales.</p> <p>BVD will be quarantined, and BVD will not be allowed to spread any further. This stage is essential in eradicating the disease, and protecting farmers with BVD herds. The Scottish Brand for quality meat will be improved, and there is more potential for international trade.</p>	<p>more of an investment, as the financial and health benefits of removing PIs are clear</p> <p>Minor staff costs for markets to check database. Market disadvantage to farmers with BVD infected herds.</p>
--	--	--

Declaration and publication

I have read the impact assessment and I am satisfied that (a) it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and (b) that the benefits justify the costs. I am satisfied that business impact has been assessed with the support of businesses in Scotland.

Signed:**Date:****Richard Lochhead, MSP, Cabinet Secretary for Rural Affairs and the Environment****Scottish Government Contact point: Derek Wilson Scottish Government Animal Health & Welfare Division, 0300 244 9813**