

Response to:

Consultation on 2007 Annual Review of Defra's Contingency Plan for Exotic Animal Diseases

Defra, in its covering letter to Consultees, invites "comment on any aspect of the Contingency Plan". The two key documents of the contingency plan are the *Framework Response Plan* and the *Overview of Emergency Preparedness*. Both of these documents are augmented by other supporting documents. In addition, both of these documents may be considered to be controls to mitigate the risks identified in the event of an outbreak of an exotic animal disease.

It is not possible to fully comment on the contingency plan without the provision of:

- a. a copy of the risk assessment to determine whether all risks have been correctly identified; and
- b. a bibliography of the augmenting documents

This may be considered as a major weakness of this consultation.

Notwithstanding these limitations, a response is made to the two aforementioned documents including reference to the following augmenting documents:

- Disease surveillance & control - Notifiable diseases (<http://www.defra.gov.uk/animalh/diseases/notifiable/>)
- Specified Type Equine Exotic Diseases (STEED) Contingency Plan (<http://www.defra.gov.uk/animalh/diseases/notifiable/pdf/steed-consultation.pdf>)
- Exercise Hawthorn – A Series of Linked Exercises Testing Government's Avian Influenza Disease Emergency Preparedness (<http://www.defra.gov.uk/animalh/diseases/control/contingency/hawthorn/hawthorn-report.pdf>)

Leading up to this consultation we have been unfortunate enough to suffer an outbreak of an Exotic Animal Disease, namely Foot and Mouth Disease. Therefore, there is experience and evidence to determine whether the plan is suitable and sufficient. Where weaknesses have occurred, particularly in the timely communication of adequate and relevant information to secondary stakeholders and the general public, this response attempts to confirm whether those weaknesses were as a result of inadequacies of the plan; a failure to correctly implement the plan or a combination of both.

1. Comment on the Framework Response Plan

The plan is comprehensive at strategic, tactical and operational levels with roles and responsibilities well defined. Through its thoroughness, it gives confidence that the plan is, in overall terms, suitable and sufficient to control and minimise the effects of a disease outbreak.

There are some minor comments, in particular:

1.1 At Red Alert - eCommunications (page 24) – "Ensure that within 24 hours website should include...". Given that this is a contingency plan and preparatory work should be undertaken during the Amber suspicion phase, can this key performance indicator (KPI) be reduced to 12 hours?

1.2 The contingency plan is not keeping up with technological advances with respect to communication.

Provision needs to be made to ensure that anyone directly affected by a disease outbreak receives **active** communication from Defra, similar in nature to that being offered by the Environment Agency service - *Floodline Warnings Direct* - a free service that provides flood warnings direct by telephone, mobile, fax or pager (details at: <http://environment-agency.gov.uk/subjects/flood/826674/1306207/?version=1&lang=e>).

A further example is that of disseminating information during the horse influenza emergency in Australia. The Australian Horse Industry Council disseminated relevant geographically targeted information through the *Horse Emergency Contact Database* - a method of conveying information to organisations or individuals in times of emergency using fax, email or SMS (details at: <http://www.horsecouncil.org.au/content.asp?z=12>). It is suggested that consideration is given to improving the routes of external communication within the Contingency Plan.

2. Comment on the Overview of Emergency Preparedness

This is a comprehensive document that again, through its thoroughness appears to be suitable and sufficient.

References are made to Notifiable Diseases, the Specified Type Equine Exotic Diseases (STEED) Contingency Plan and Exercise Hawthorn. Specific comments with respect to these are made later in this document.

There are some minor comments, in particular:

2.1 Reference is made in the Overview document to STEED as "current policy on equine diseases". Whilst this may indeed be the case, the document as presented, may lead to a lack of confidence as it is marked as "Draft -- Discussion Only" and "Draft for Consultation" dated August 2005. The summary of responses to the STEED Consultation indicates that the STEED plan would be issued for further consultation in spring 2007. A spokesperson for Defra has indicated that progress with STEED has stalled. It is strongly suggested that this work be progressed to completion.

2.2 Rural Issues – 4.59 (page 40). The sentiments in the text "During any outbreak of animal disease Defra pays close consideration to the needs of the rural communities affected. Defra's policies to assist rural communities in such situations can be found at www.defra.gov.uk/rural/stress/default.htm" may be considered to be appropriate. Rural communities in the midst of an outbreak do indeed require assistance. However, "combating rural stress" appears to offer an incomplete solution and therefore must be considered insufficient.

2.3 A reference to "lessons learned" is made in section 5.7. It is unclear either from the Overview of Emergency Preparedness, the Framework Response Plan or other identified augmenting documentation whether there is a formal process to conduct a post event "lessons learned review" after a confirmed outbreak. It is suggested that if not already in existence, that this process is formalised and input is encouraged from anyone who may have been affected by the outbreak. These contributions will benefit the process of continual development of the contingency plans.

3. Notifiable Diseases

3.1 There appear to be inconsistencies in both content and structure of the disease fact sheets. It is suggested that where possible, a structured template is used.

4. Specified Type Equine Exotic Diseases (STEED) Contingency Plan

4.1 This document is well written and offers a level of measurable detail absent from the Framework Response Plan and the Overview of Emergency Preparedness. This is of course reflected by its additional length. It is suggested that this document be reviewed to determine whether any of its content, particularly the level of detail, might be usefully incorporated in the two key documents under discussion.

5. General Comments

There follow some general comments based on the overall contingency plan as opposed to the individual documents. Because of the lack of a risk matrix it isn't possible to tell whether all risks have been identified and subsequently mitigated.

Speaking broadly, a contingency plan relating to Exotic Animal Diseases should seek to contain and minimise the effects of an outbreak and to prevent its further spread. The latter may be dependent upon the cooperation of all stakeholders and the general public. Defra has a responsibility to ensure public trust and confidence through providing timely, relevant information to anyone who may require it. Failure to do so may lead to panic, inappropriate and irrational action, negative financial consequences and ultimately spread of the disease. The framework document contains KPI's for the provision of information. However, there does not appear to be a process within the contingency plan for ensuring that information is readily available for all individual target groups (before an outbreak); that it is suitable, sufficient and relevant and that there is a way of measuring its effectiveness. For web-based material Defra could adopt the approach taken by many

companies of providing a simple question at the bottom of each page containing information - "did you find this information helpful – yes/no". It is essential to get user feedback on the usefulness and quality of information supplied by Defra.

It has to be questioned whether Defra has identified all key stakeholders and secondary stakeholders. Secondary stakeholders may be defined as those who are not the keepers of the affected animals but may be able to spread the disease. It is of concern that both of the key documents are farming centric - repeatedly mentioning the affected population as farmers and referring to the NFU. Whilst this is understandable given that most of the Exotic Animal Diseases are associated with farm animals, it should be recognised this is not exclusively the case. Graham Cory, Chairman of the British Horse Industry Confederation (BHIC), was recently quoted as saying: "Defra issued the guidelines for horses two or three weeks after the first case of FMD. It was clear they did not consider horse owners important. It is essential that we are not considered an afterthought." As part of the contingency planning, before any outbreak, all key and secondary stakeholders and target groups should be identified.

The recent Foot and Mouth Disease outbreak showed that Defra responded quickly in containing and preventing further spread of the disease, although clearly there are still some questions to be answered. It appears that the contingency plan worked well in that particular aspect.

Where it failed miserably was the communication with secondary stakeholders and the general public. It appears that may be attributable to failures in implementation rather than failure of the plan.

Exercise Hawthorn Lessons Learned Report (September 2006) mentioned under the topic of Communications "It was also felt that help-line operators should have pre-prepared guidance on standby, set to roll out in the event of a real outbreak as an explosion of calls was sure to follow on closely from any press coverage." Whilst this was an issue during the exercise, it was also an issue for horse owners during the recent Foot and Mouth Disease outbreak. This appears to be an implementation failure rather than a contingency plan failure. Nonetheless, it is of concern that there appears to be a control weakness with the lessons learned review process.

I trust that these comments help.

However, I would urge you in future consultations to provide a risk assessment directly associated with, and referencing the controls to, the Framework Response Plan and the Overview of Emergency Preparedness. This will enable all those involved in the consultation to rapidly determine whether all significant risks have been identified, before moving on to providing feedback on the suitability and sufficiency of the mitigating controls.

Best regards,

Ken Law

Editor
Riding Safely