

13th December 2013

Alastair Douglas  
Animal Health and Welfare Division (P Spur)  
Directorate for Agriculture, Food & Communities  
Scottish Government  
Saughton House  
Broomhouse Drive  
Edinburgh EH11 3XD

Dear Mr Douglas

### **Foot and Mouth Disease Policy Discussion Paper**

Ramblers Scotland welcomes the opportunity to submit comments to the consultation on this Foot & Mouth Disease Policy Discussion Paper. Our comments are mainly restricted to Section 5, dealing with Access to the Scottish Countryside.

**Q7.** We have one comment to make regarding the risk assessments referred to in Para 4.3. It appears that the starting point for all VRAs is that the person or animal is already infected with FMD. However, the level of risk of a cyclist or walker being infected with FMD (VRAs 10-12) is far lower than, for example, for the risks regarding movement of livestock (VRAs 1-4). Since these VRAs will be used to inform decisions on the controls that need to be applied during an outbreak of FMD, we feel there should be some further grading of these risk assessments to show higher and lower levels of risk.

**Q9.** We welcome the statement that access will only be temporarily restricted within the Protection Zone during Phase 1, and not restricted in the Surveillance Zone or Restricted Zone. However, we would welcome some clarity on the duration of Phase 1, as it states this is 30 days after the end of the vaccination programme within the PZ. We would like to see confirmation that the vaccination programme would be carried out over the shortest possible period in order to keep the access restrictions to a minimum.

We especially welcome the flexibility outlined in Para 5.3 that enables access authorities to keep open specific land within the PZ, such as beaches and forests, along with any other land as appropriate. We believe that this flexibility will help foster goodwill amongst the general public and lead to greater compliance with the restrictions than might otherwise be the case. If people do not appreciate why the entire PZ is closed when some of the area may not be land farmed for livestock, or indeed comprises bodies of inland water, it is more likely that incursions will take place, since we assume the PZ will only be demarcated by signage rather than special fencing in most cases. We also welcome the commitment to re-open core paths as soon as possible, assuming that the current change to the legislation to enable core paths to be closed is passed.

**President:** Dr Andrew Murray  
**Convener:** David Thomson  
**Director:** Dave Morris

As an additional comment, note that there is cause for confusion when reading the document as to whether the Phases regarding licences for animal movements outlined in Para 4.2.1 relate to the same Phases as for the vaccination programme. Some change of wording may be required to differentiate these two Phases if they are not related.

**Q10.** The success of this plan will only come about if the FMD policy's approach is to ensure that access restrictions are minimised as far as possible, to encourage public understanding that the risk of spreading the disease by recreational users is extremely low, and to widely publicise an accurate record of any restrictions. The members of the DAG are well placed to undertake this communication through their various partnerships and networks, disseminating the information to their constituencies of interest. We are pleased to be represented on this group and will support its work if the need arises.

In terms of changes to the membership, it may be useful to have more than one representative from a local authority, perhaps including a CoSLA representative as well as an access officer from the Scottish Outdoor Access Network (note the name change from Scottish Countryside Access Network).

**Q11.** We have no strong opinion as to whether a further mechanism is needed to consider land closures outwith the PZ, but we believe the DAG members should be able to fulfil this role.

As a final comment we suggest that there is a need for a second paragraph in section 5.1 along the following lines:

"It is important to stress, in the very first public statements about a FMD outbreak, and in subsequent statements, that the countryside as a whole remains 'open' and public access restrictions will only be needed in very limited areas close to infected premises. Such statements should also make clear that where reference is made to nationwide restrictions these apply only to the movement of farm animals, not to members of the public."

The need for such a paragraph flows from our experience of the 2001 FMD outbreak when, in the early days of the FMD outbreak, government Ministers and leaders of the farming community made pleas for the public to stay out of the countryside. This led to a massive shut down of outdoor activities and had a huge impact on tourism and the economic viability of many rural enterprises. Although it was clear from the veterinary advice that such closure was unnecessary, this was ignored as a sort of mass hysteria gripped organisations and individuals who had responsibilities for public access in the countryside and they felt they had to close everything down in order to help the farming community. It took many months to reverse this situation, by which time a great deal of economic damage had been done. The need to emphasise that the countryside as a whole is open is at least as important as describing the specific restrictions that might be needed in the vicinity of infected premise.

We trust these comments are helpful and would be happy to discuss any aspect of this response in further detail at your convenience.

Yours sincerely

Helen Todd  
Campaigns & Policy Manager

**President:** Dr Andrew Murray  
**Convener:** David Thomson  
**Director:** Dave Morris

The Ramblers' Association is a registered charity  
England & Wales no 1093577, Scotland no SC039799)  
and a company limited by guarantee, registered in  
England & Wales (no 4458492). Registered office: 2<sup>nd</sup>  
floor, Camelford House, 87-90 Albert Embankment,  
London SE1 7TW