



Guidelines for the Animal Health Control Programme

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1. Is an Animal Health Control Programme mandatory?

Yes, in line with regulation 79(2) of S.L 437.47 -- The Veterinary Medicinal Products Regulations -- as from 23/04/2023 it has become mandatory for every registered or licensed establishment of food producing animals and for establishments where animals are kept for display to the public or for breeding purposes to have an appropriate animal health control programme designed and implemented under the responsibility of a professional registered with the Veterinary Surgeons Council.

As per above, it is important to note that this requirement is not mandatory only to farm animals.

Although the professional may not necessary be a Veterinary Surgeon, as of the date of the publishing of these guidelines only members of this profession are being warranted by the Veterinary Surgeons Council. It is envisaged that other professionals will eventually be warranted, and who can also be responsible for the animal health control programme.

Anything included in the Animal Health Control Programme must be agreed upon between both parties, i.e., professional and animal owner. If the owner contemplates a change in the programme, that change should only be made in discussion with the professional.

Factors that may be difficult to implement in practice must be discussed in advance and before the finalisation of the final programme. Thereafter, justifications must always be provided when making changes in the programme.

When visiting the place where the animals are kept the professional should do the utmost to ensure that the programme is being followed. This responsibility of the professional should be real not nominal. This point will be taken seriously by the Veterinary Regulation Directorate.

If any shortcomings or area/s for improvement are identified the professional should discuss them with the animal keeper.

Ultimately, both the professional and animal owner should bear equally the responsibility for the Animal Health Control Programme, and they should be held into account according to their respective role. This principle will be taken in consideration during official controls.

2. What is an Animal Health Control Programme?

In simple terms the Animal Health Control Programme puts black on white what the animal owner should already be doing in practice for the proper rearing of the animals.

It is one of the best ways to protect animal populations from diseases, improve animal welfare and ensure the safety of animal products.

Rearing of animals should only be carried out under the care and attention of a suitably qualified professional exactly in line with the animal health control programme. If an important action deviates from what is written on the programme, this should be reviewed. The result would be that either the programme is changed or otherwise, the particular action is halted.

In essence, the Animal Health Control Programme should act as the policy of the establishment when it comes to the rearing of animals which is very clear and easy to refer to. It should facilitate compliance with good animal management (e.g., farm or zoo management) and make it easier for all parties (include regulators) to detect any divergencies.

In a well-managed livestock system, the prevention – as opposed to the cure – of diseases are an important part of a high standard in the management of animal husbandry.

An animal health control programme is a working document which explains the management strategy for your livestock, written specifically for the unique needs of a particular establishment.

The animal health control programme can be a physical one or can be kept in electronic form. It could exist as a single hardbound register or made up of different and separate organised file systems.

In any case, a good animal health control programme should have the following requisites:

- Identify all significant animal pest and disease problems that could be encountered.
- Outline the preventive measures that may be taken. In this respect preventive measures are all encompassing and include both preventive measures that avoid cross contamination or introduction of diseases (e.g., hygiene or biosecurity) and those that safeguard the health of the animals in case they come in contact with a disease (e.g., vaccines)
- Explain what treatments will be used if pest or disease problems do occur despite the precautions taken.
- Identify how the animal owner intends to improve overall herd or flock health and reduce the use of veterinary medicinal products, particularly antimicrobials.
- Keep all relevant records, proof of purchase and possibility to trace back anything that has been introduced in the establishments for at least the last five (5) years.
- Include all relevant invoices and receipts, e.g., purchase of medicines and feeds. These must invariably be kept on site and shown during official inspections.
- Make it easy to identify areas where changes are needed. The importance of honesty in assessing the veterinary condition of the establishment cannot be over-emphasised. Shortcomings must be highlighted and not hidden away.

3. Why should establishments have an Animal Health Control Programme?

The animal health control programme permits the animal owner and professional to assess the disease risks on the establishment, to record and monitor the incidence, and then enable them to use this information to make management changes or carry out veterinary intervention.

It will also help the animal owner to see if these management changes are working and clearly measure the establishment 's overall performance.

The national 'Strategy and Action Plan for the Prevention and Containment of

Antimicrobial Resistance in Malta (2020 – 2028)' Objective 1.7.1 says: Identify, through a consultative process, the respective roles and responsibilities of key stakeholders in complying with these requirements and the legal framework for animal health plans on farms, which are commensurate with their scale of activity

Various studies throughout Europe emphasise how an animal health control programme goes a long way to improve the health and welfare of animals while encouraging the prudent use of medicines. Section 3.4 of the EU Commission's Guidelines for the prudent use of antimicrobials in veterinary medicine (2015/C 299/04) indicated that by putting in place contracts or arrangements between the animal owner and a veterinary surgeon for a specific herd or flock, such that the veterinarian can develop a better understanding of the overall health status of the herd or flock, and thereby reduce the prevalence of disease and the use of antimicrobials.

In point 8 of the Guidelines, it again highlights how implementing measures strengthening the position or status of the prescriber in relation to the animal owner (e.g., setting up registered contracts between animal owner and professional which include scheduled regular visits by the veterinary surgeon to the farm; introducing guidelines including requirements to perform susceptibility testing).

In Section 4.2.3.7 of the EMA and EFSA Joint Scientific Opinion on measures to reduce the need to use antimicrobial agents in animal husbandry in the European Union, and the resulting impacts on food safety (RONAFA) 1 December 2016 (EFSA BIOHAZ Panel), 8 December 2016 (EMA CVMP) there is a whole section on animal health control programmes (named Herd Health Plans). This section explains how a herd health plan is considered as the actual operational tool developed to achieve goals regarding herd health. A study (Jones et al., 2015) found that herd health planning was part of described processes being used by animal owners in the study to understand their use of antimicrobials and to assist in planning to reduce their use of antimicrobials.

4. Who should prepare and be responsible for the Animal Health Control Programme?

The animal health control programme must be prepared by the professional qualified to do as indicated in Section 1 of these guidelines. It is again being emphasised that the assistance of the animal owner is essential for the finalised programme. The responsibility of its implementation is shared. No party can blame the others in case the programme remains largely a theoretic pile of documents that is rarely followed.

The Veterinary Regulation Directorate will keep a register of the professionals responsible for each animal health control programme. The Veterinary Regulation Directorate should be notified without any delay, but in any case, not later than 7 working days, should there be any changes in the details or identity of the responsible professional.

It is acceptable for the veterinary clinic to prepare the animal health control programme. The management of the veterinary clinic shall decide which professional person 's name shall be provided to the Veterinary Regulation Directorate.

Within reasonable limits of practicability, and unless no conflict of interests ensues, one professional can be responsible for more than one animal health control programme of different establishments.

5. What should be the backbone of the Animal Health Control Programme?

It is not the intention of the Veterinary Regulation Directorate to dictate exactly how every programme of each establishment should be. Each individual establishment has many variables such as the type, size and scale of the establishment in question.

It is counterproductive for the Veterinary Regulation Directorate to be too prescriptive. An animal health control programme can consist of just 2 pages, and it would fit the needs of establishment. On the other hand, it could consist of hundreds of pages and still not be satisfactory, if the scale of the establishment is such that an extensive programme is required.

Below are just a few ideas that interested parties could take to prepare their own animal health control programme that may fit their need.

A. Introduction

- Description of the establishment, including physical premises, different type of buildings and land available.
- Summary of grazing regime (if grazing is possible), including objectives of grazing as well as the expected outputs (when applicable, e.g., in case of goats and sheep).
- The environmental aspect must also be taken in perspective, e.g., what measures are being taken to avoid over-grazing or any pollution to the environment, e.g., manure close to water bodies.

B. Outline of the Livestock System

- The Land: - More detail including how the total area is split up and any management restrictions or subsidies that affect the land.

- The Livestock: - A description of the numbers, age and types of stock and whether they are transferred, owned or borrowed. All relevant dates must be kept and records of the origins of the animals kept.

C. Housing

- Description of housing available, when and how it is used.
- Information on cleaning, disinfection and routine maintenance of buildings and equipment, and use and disposal of soiled and/or contaminated bedding.

D. Feed and water

- Description of the forage available from the land (where such practice is possible) and a detailed description of what mineral and/or forage supplements will be given and under what circumstances, especially under emergency conditions, e.g., drought, extreme of temperatures and heavy rains including the possibility of floods.
- Description of the source of water given to the animals. Instructions of how this is periodically checked.
- Description of the different type of feed that is given during the life cycle of the animals. This must be as detailed as possible and include what measures are taken to prevent contamination or deterioration, especially if it is manufactured, or partly manufactured, in-house.
- Observations of the feeding habits or behaviour of the animals that might indicate nutritional deficiencies or unsuitability of feeds. If it helps, the animal owner can keep dated notes of his/her observation.

E. Record keeping

The records that should be part and parcel with the Animal Health Control

Programmes include the following:

- Flock/herd records, there tag/batch number and origin (relevant documents to be kept)
- Animal identification documents (commonly known as passports)
- Movement book (the animals should be traced as far back as possible)

- Blood tests
- Vaccination schedules
- Feeding routines
- Cleaning/disinfection record sheets (signed by the cleaner and countersigned by the supervisor)
- Health History: Relevant information about the animal's health, including any pre-existing conditions, previous treatments, or veterinary history that may impact the current treatment.
- Pest-control schedule
- Treatment record (commonly known as the 'herd-book', date of treatment, name/strength/dosage/pharmaceutical form/frequency and duration of treatment includes administration of medicines under the cascade, prophylaxis, metaphylaxis, vaccines and routine administration, e.g., de-worming practices or removal of mites)
- Records of alternative control treatment, even if strictly speaking the products used for treatment are not classified as veterinary medicinal products
- Veterinary surgeon visits (routine or out-calls due to a requested visit). This should include reason for visit and outcome. Dates and names should be very clear. Updated contact details should be kept.
- Copies of veterinary prescriptions
- Copies of any diagnostic results
- Any relevant certificates, e.g., those certifying that newly introduced animals are free from certain diseases
- All relevant invoices and receipts (e.g., purchase of medicines and feeds)
- Inspection reports and follow-ups by the Veterinary Regulation Directorate

All records should generally be kept for a period of not less than five (5) years and be available for inspection.

F. Training

- Outline of the current experience of staff, past training and future requirements.
- Material of training and records (e.g., dates when given, who gave it and who received it) must be kept as evidence.
- Training records are not synonymous with certificates. A record indicating the date of training, name of trainer and trainee, subject matter of training and expected date of next training should be enough.
- Records of external trainings attended by the animal keeper, and even the professional, should be kept. These include any training sessions organised by the Veterinary Regulation Directorate.

G. Fire and emergency procedures

- The precautions taken to avoid accidental fires should be explained in detail. A plan of action for emergencies must be described in detail, e.g., fire in housing system.
- A rapid evacuation plan must be drawn and must be visible in all relevant areas. A copy of this should be kept in the Animal Health Control Programme.
- Equipment for emergency situations must be kept in working order and documents thereof should be kept in the Animal Health Control Programmes.

H. Health and animal welfare Status of the animals

The Animal Health Control Programme should contain a description of the general regime that is followed with regard to the health and welfare status of the animals. These descriptions could include, but not limited, to the following:

- Detailed information about the breeding regime, including selective breeding.
- Monitoring and collecting data on animal diseases to identify outbreaks and track disease trends.
- Disease level targets for the next 12 months.

- Description of the clinical treatments that were used to deal with specific problems in the past and their effectiveness. This would help in the planning for future action.
- Description of the rationale behind the planned routine visits of the veterinary surgeon and/or professional responsible for the animal health control programme.
- Management strategies for husbandry practices. These should be based on the specific animal life cycles and disease epidemiology factors.
- Advice of the veterinary surgeon regarding the introduction of new animals in the establishment.
- Description of pre-movement treatments, e.g., broad-spectrum wormer, sheep/goat scab treatment.

I. Biosecurity

Biosecurity is the prevention of disease-causing agents entering or leaving any place where animals are present. The Animal Health Control Programme should not just outline the measures that are taken for the implementation of a good biosecurity level but must also delve in detail about the different aspects involved.

Some of these important aspects that should be described in the programme include the following:

- Management of visitors to the establishment (vehicles and people).
- Disinfection agents and disinfection techniques for the areas and materials.
- Description of access routes and parking areas.
- Handling of storage areas of all materials (including medicines and feed) to keep them clean, tidy and uncontaminated at all times.
- Prohibition for sharing injections and dosing equipment.
- Implementation of a pest control plan.
- Proper disposal of dead animals.
- Proper disposal of bedding and washing of PPE/overalls carefully.

- Preventive measures to avoid contact of animals with freshly spread slurry for at least 6 weeks.
- Policy for the replacement of animals. As much as possible breeding in the same establishment is encouraged.
- Importance of regular cleaning and disinfection.
- Description of feeding/drinking equipment, silos or anything that comes in contact with feed or water, and how these are kept clean and uncontaminated.
- Description and licence number of vehicles used for transport and how these are kept clean and uncontaminated.
- Facilities for quarantine of animals (new arrivals or sick, suspected to be sick animals).
- Measures taken for fencing off stagnant bodies of water and watercourses.
- Measures taken for fencing off stagnant neighbouring premises to prevent animals from different establishments mingling together.
- Proper storage of medicines and feed. It is also important that these are stored in the appropriate temperature, non-direct sunlight and low humidity levels. Some medicines should generally always be kept under temperature-controlled conditions, e.g., refrigerator.
- It is important that storage is done in such a way that mix-ups are avoided.
- Precautions that are taken to avoid contamination, in particular feed and water

6. What are the main pathologies of farm animals in Malta?

This section lists the main pathologies present on the Maltese territory. The information was obtained from the data and experience of the official veterinarians at the Veterinary Regulation Directorate. The Animal health control programme should make a special emphasis on the best ways to prevent these diseases as their incidence may be reduced if the animal owner adheres to the directions given on the programme.

Bovines:

- Calf diarrhoea
- Calf pneumonia
- Retained placenta and endometritis.
- Mastitis (especially milking cows)
- Lameness (foot rot, digital dermatitis, white line, sole ulcers)

Caprine and ovine:

- Calf diarrhoea
- Calf pneumonia
- Retained placenta and endometritis
- Mastitis
- Lameness (foot rot, digidermatitis, white line, sole ulcers)

Swine:

- Streptococcus suis infection
- Post-partum vaginal /vulvar infections in sows
- Mastitis (E Coli / Salmonella)

- Greasy pig disease (Staphylococcus hyicus)
- Ringworm (Trichophyton /Microsporum spp.)
- Mange (Sarcoptes scabiei)
- Fly strike (House fly / stable fly)
- Internal Parasites
- Coccidiosis (Various coccidia)

Poultry:

- respiratory diseases
- gastrointestinal disease
- foot-pad dermatitis
- injurious pecking
- fungal infection

Rabbits:

- skin lesions
- ear infections
- mastitis
- wound infections
- respiratory
- haemorrhagic diseases

7. Animal welfare and antibiotic resistance, what is the link?

Apart from the obvious benefits in animal health, less risks in human health and increased safety of product obtained from animals (in case of food animals), the animal health control programme will also ensure higher standards of animal welfare and may also decrease reliance on antibiotics, reducing the rate of antimicrobial resistance.

Animal welfare is based on the principle that animals have fundamental value and should be treated with respect, dignity and compassion. Animals are sentient beings and can feel suffering, pain, pleasure and joy. The aim of the measures for the welfare of animals is to minimize any damage or unnecessary suffering that they may suffer because man.

Antibiotic resistance occurs when animals take longer to recover from infections despite the use of antibiotics, or even end up not recovering at all. Around the world, increasing doses of antibiotics are being used which then cause unwanted effects to animals. Bacteria that usually die from the effect of antibiotics are surviving. In other articles we have also discussed how this resistance can even pass to man.

The animal health control programme should pay attention to both aspects. Therefore, it would be hitting two birds with one stone. That is, respect the principle that animals deserve a proper life with respect, dignity and compassion, as well as reducing the risk of antibiotic resistance.

8. Where can one find more information on the Animal Health Control Programme?

For further information, interested parties can contact Veterinary Regulation Directorate in the following ways in order of preference:

E-mail: Veterinaryregulation.mafa@gov.mt

Tel: Animal Health Unit Tel: +356 22925197 / +356 22925301

Address:

Animal Health Unit
Veterinary Regulation Directorate
Animal Health and Welfare Department (AHWD)
Abattoir Street, Albertown,
Marsa MRS 1123, Malta

9. How can I inform the Veterinary Regulation Directorate about the Animal Health Control Programme?

Animal keepers are expected to provide in writing the details of the professional person responsible for the Animal Health Programme to the Veterinary Regulation Directorate. The details of the professional person should include the following:

- Name and surname:
- Profession and warrant number (*if applicable*):
- Date when Professional was officially engaged for the task:
- Contact details of the Professional (mobile number and/or land line and e-mail address)
- Details of the establishment (name, number (*if applicable*), address, name of owner) which relates to the Programme

The details can be sent by post to the address above or e-mail Veterinaryregulation.mafa@gov.mt