

Corporate Services Scrutiny Panel
Scrutiny Office
Morier House
Halkett Place
St Helier
JE1 1DD

May 30, 2008

Dear Sirs

Review into the importation of Bovine Semen P.43/2008

I have no family or business connection with the dairy industry and have become involved with this issue purely as a result of my position as Deputy of St Mary. I will state that I have been approached by a substantial number of people concerned about the implications of semen importation and have attended meetings of both “pro” and “anti” cattle farmers.

This has been quite a difficult submission to formulate as I am in fact looking at the matter under review from a number of different angles. From the outset I would like to make it clear that I have a great many questions about this matter and, so far, not very many answers. I do hope that during the course of your review, more answers will emerge but I do think it is significant that what appears on the face of it to be such a simple yes/no proposition has raised so many questions and that the topic, when examined closely, has so many facets. I feel, and this has been echoed by many of the people who have contacted me, that this has been presented in a rushed fashion, almost on the assumption that if a certain group says it is necessary, then it must be accepted.

Even now we are being told that this must be resolved before the summer recess, as if the industry will collapse by September without it. No one can expect, that even if the importation of bovine semen is approved, there will be anything like an overnight impact on local cattle – no significant change will be seen locally for at least 5, probably more like 10 years and in this timeframe we can afford to take a respectful amount of time to consider the matter fully. As I will point out later, I consider that there is some very important “outside” consultation that has not taken place that absolutely must be considered before going ahead with this proposition and I would urge the Panel not to allow the importance of the scrutiny process to be devalued by time constraints imposed on your work.

In fact, there is only one thing about this whole issue that would be instantaneous and that is the end of any kind of closed herd status for the Island’s cattle from the time that the very first straw of semen comes in. There would be, quite simply, **no going back**. Whilst the report reminds us that the use of imported semen will not be compulsory, the effects of any importation will affect the entire local industry. It will not be possible for farmers to opt out of the consequences simply by not using the genetic imports. It is for that reason above all others that I believe that we must have a 100% understanding of the implications before putting this matter to the vote.

I would like to just note, without commenting, some of the questions and remarks that I have come across from the general public. Whilst these do not necessarily reflect my personal concerns, I think they will need to be addressed in order to understand the situation fully.

- The Jersey Cow does not belong just to the current group of farmers – it is an Island Icon and we all have a responsibility to safeguard it.
- Will we see a change in our cows?
- Will we see different breeds in our fields?
- Will we still see our Jersey cows grazing in the fields

- Will this lead to milk importation?
- What is wrong with the cows we have now? Is it a matter of genetics or husbandry?
- Is there a level playing field when trying to benchmark our local cows against the rest of the world?
- Who stands to gain from this? Is it just the farmers with interests in genetics companies? How can there be no conflict of interest here?
- Who are they (the “pro importers”) trying to kid? We have been told for ages that there is too much milk and that we need to reduce the herds and now that we have done that, they are saying they can’t produce enough milk!
- Is our gene pool wide enough to ensure that the closed herd remains viable?
- What about all the local genetics stored on the Island as a result of earlier programmes? Who owns them, who uses them and how is their integrity and viability monitored?
- What is the guarantee of purity of Jersey cows reared elsewhere – to put it bluntly, how long does it take for a farmer in the US to turn a Holstein into a Jersey, for example? How many generations does it take to breed out the Holstein material and how can you account for genetic throwbacks?

I have researched a couple of these issues more fully, largely on the internet and would like to make the following points:

Gene pool size.

In the report accompanying the proposition the figure of 5,000 cattle is boldly stated as being the minimum for viability. Where is the evidence for this? There are examples of much smaller herds being viable, such as the case of the Chillingham Whites. Furthermore, if this figure did transpire to be correct, then it seems foolish in the extreme to have placed ourselves in the position whereby our numbers have fallen below this level. Either there was an element of engineering the situation to favour future genetic importation or otherwise the industry simply got their judgment wrong on the issue of reducing numbers – in which case how can we be sure the current call for semen importation is any better thought out? There are experts in the field of genetics and indeed there is much local expertise at Durrell.

I request that expert advice been taken in this matter

The legal position

The legal position is not straightforward and the Panel is in a better position to take appropriate legal advice on this. It would seem that although there is a requirement to ensure that our law is compatible with our obligations under EU law, precedent exists which has established that the protection of an animal species may justify trade barriers between member states. This is crystallised in the case involving Danish Brown Bees, the details of which are easily available on the internet. I would go further, however and comment that apart from having the ability to maintain trade barriers (on the trade of genetics, specifically in this case) in order to protect the unique closed gene pool of our cows, we may actually have a duty to do this. I believe that under the Convention on Biological Diversity there is a duty to safeguard farm animal genetic resources. Surely the Jersey Herd is an example of such a resource? I do not see anywhere in the report that any attention has been paid to this issue and would respectfully request that Scrutiny investigate this matter with the DEFRA Standing Committee on Farm Animal Genetic Resources. .

Regarding Milk Importation, it would appear that there in no barrier to a challenge being mounted

against the ban on milk importation, either with or without the importation of semen. That said, however, the strongest card in resisting a ruling against the existing restrictions would seem historically to have been the need to protect the closed herd status. The Report seems to allude that as the size of the herd has been reduced, that would no longer apply and again I would question the reliance on the figure of 4-5,000 cows quoted in the report and ask for this to be reassessed by an independent genetics expert.

Non-statutory means of restricting the breed of cows used locally.

Measures have already been put in place in the re-writing of the rules of the Herd Book to ensure that only milk from approved cows (based on their pedigree) will be accepted by the dairy. One effect will be to make it unlikely that other milking breeds would be raised here (as of course there would be no legal impediment to importing embryos of any other breed and thus producing a herd of completely "alien" cows in only one generation however unlikely this might be). There has been an absolute prohibition on importing cattle since 1878. By setting the limit to obtain pedigree status at 7 generations, the guarantee of purity is cut to less than 25 years!

Members were also told, however, at the second RJA&HS presentation that there was in fact only one company controlling the local trade in genetics and that it was unlikely that another importation centre would be established due to the cost factor. It was therefore possible to exert influence on the types of imported genetic material that would be easily available. I have not explored the question of a potential abuse of monopoly position but it is possible that this could be an issue in future – I would ask for a comment on this.

Reliable benchmarking.

Our cows have been compared against cows in the US, Denmark, the UK and other countries but are we comparing like with like?

Not all countries look to the same measurement of success in their cows. We concentrate on milk yield but others prefer to consider the weight of butterfat content produced per acre of pasture, for example. This is an apples vs. oranges situation.

Not all cows in the UK are monitored. Milk recording is not compulsory and costs the farmer up to £12 per cow – he may well tend to record only his very best cows. There are local cows which can and do perform as well as the best in the UK (a local farmer has won the John Ibbotson cup for best Jersey type and producer, which is open to cows across the UK, for example) and this begs the question – surely the good genetics are already available in the herd?

Secondly, are we comparing natural husbandry with technologically enhanced manipulation? Many comparisons have been made with cows from the United States and where the prevalence of genetically modified products is well documented.

There is widespread use of genetically modified crops in animal feedstuffs and although this does not necessarily result in increased milk yield it must be questioned whether there are any resulting changes in the cattle which might be passed on genetically?

What does account for a dramatic increase in yield, however, is the use, in up to 49 States, of Bovine Somatotropin. This is a naturally occurring chemical produced by the cow's pituitary gland but it has been produced artificially. This recombinant bovine somatotropin, injected regularly in the dairy cow can increase milk production by between 10 and 15%. Its use is widespread in the US but it is not used in the EU, Canada, New Zealand or Australia. Indeed the manufacturer's web-site contains glowing testimonials from users who say, for example: "rBST is a real asset to our farm. It has allowed us to increase our production, without adding a lot more cows"; and the commercial honesty of a farmer, who is after all a businessman shows why the use is so widespread: "I use rBST because it makes me money."

Whether you approve of such practices or not, the fact is that it is hard to see how the figures for

milk production, which is a prime reason we are told that we need to import genetics, can be compared with the figures for our non-GM cows.

The Cultural Issues

I would like to end by raising a point that has no economic value, no legal status but which is nevertheless important and which has figured strongly in a lot of the comments I have received from non-farmers. That is that the Jersey cow is a lot more than just a machine to convert grass into milk, it is a symbol of Jersey success, of the way in which a small island can influence the world and that culturally it belongs to every islander. The question is - does a relatively small number of people have the right to change forever the way in which the Jersey Cow looks and behaves? I have no magic answer to that except to pose another question – if the local Jersey is deficient, if it must change, if there is no alternative, if there is absolutely no other way than by the importation of genetics, and if it is so obvious, then why is it impossible to get all the dairy farmers to agree?

The answer must be that the case for change has simply not been proven.

Yours faithfully

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Deputy of St Mary

nb: any references to “the Report” refer to the report accompanying P43/2008

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