

BVA and BCVA response to Scottish Government's phase 6 of the Bovine Viral Diarrhoea (BVD) Eradication Scheme consultation

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Introduction

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,500 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) The British Cattle Veterinary Association (BCVA) represents around 1,700 veterinary professionals, principally working with livestock in the UK. Most members are in farm and mixed practices. BCVA also represents those studying and working in industry and academia
- 3) We welcome the opportunity to contribute to the consultation on the Scottish Government's phase 6 of the Bovine Viral Diarrhoea (BVD) Eradication Scheme.

Question 1: Do you think that a BVD check test should require a minimum of 10% of animals to be tested? Options: Yes; No; Please explain your views:

- 4) No. This proposal would diverge from other eradication schemes across the UK, which would cause confusion at a time when UK wide BVD eradication is the target. Requiring a minimum of 10% of animals to be tested is not necessary because the 'Check Test' of 5-10 animals per management group is designed to detect exposure to BVD from the presence of a persistently infected (PI) animal. It is better to find ways of improving understanding and compliance with the check test through farmer/vet education and better use of the vet in identifying all management groups of eligible animals.

Question 2: How many months do you think that cattle keepers should have to complete their CBI? Please explain your views:

- 5) It has already been identified in the feedback, which Scottish Government has received, that some farmers may struggle to maintain focus on testing targets over a long period of time. Equally it is important to note that an extreme shortening of the time to complete a CBI could also put undue pressure on farmers that ultimately leads to poorer collection of data on the cases of BVD in Scottish herds. Therefore, we think cattle keepers should have 3-4 months to complete their CBI because this is short enough to allow for focused collection of tests and it could be fitted in with routine jobs such as weaning and housing.

Question 3: Do you think that herds that have completed a CBI should be required to have veterinary certification after the "follow-on" calf testing period? Options: Yes; No; Please explain your views:

- 6) No. This proposal devolves responsibility to the vet alone. We would propose something similar to other BVD control schemes: a tripartite certification process involving the farmer certifying all eligible animals have been submitted for testing; the laboratory certifying all testing completed from those animals; the vet certifying all animals submitted have been tested. That way all three parties are engaged, with the farmer rightly responsible for the process. From Scottish Government's own analysis, it is worth noting only 17% of farms fall into the category of noncompliance in follow on calf testing after CBI completion.

Question 4: Do you think that all cattle on non-compliant CBI holdings should not be allowed to move off the holding for any reason (including slaughter), regardless of individual BVD status? Options: Yes; No; Please explain your views;

- 7) No. Preventing all movements off the holding, including direct to slaughter, is too stringent and could lead to overstocking and subsequent health and welfare issues. Other measures to encourage compliance need to be considered ahead of a total ban on movement of herds off site. Preventing movement to slaughter doesn't help with BVD control it can lead overcrowding of cattle would inhibit their ability to carry out their natural behaviours causing great distress in addition to increasing the potential spread of the disease if one of the cattle is found to have BVD. Whilst we fully appreciate the need to find and eradicate BVD in herds it is important that we do not unnecessarily compromise the welfare of the cattle, especially if it turns out there are no recorded cases of BVD on farm.

Question 5: Do you think that all cattle on non-compliant CBI holdings should only be allowed to move directly to slaughter, regardless of their individual BVD status? Options: Yes; No; Please explain your views;

- 8) Yes because of the real and not insignificant risk of an undetected PI or other BVD shedder spreading the disease to other presently un-infected herds. This is a small number of noncompliant farms at the tail end of BVD control.

Question 6: Do you think that female animals on non-compliant CBI holdings should only be allowed to move directly to slaughter, regardless of their individual BVD status? Options: Yes; No; Please explain your views;

- 9) Yes. Please see answer to Q5.

Question 7: Do you think that no cattle should be able to move on to a non-compliant CBI holdings? Options: Yes; No; Please explain your views;

- 10) Yes. This is to be consistent with current policy on a farm with uncertain status as movements on only increase the potential pool of susceptible animals in the epidemiological unit of a potential undetected infected BVD animal.

Question 8: Do you think that non-compliant CBI herds should be publicly listed e.g. on ScotEID? Options: Yes; No; Please explain your views;

- 11) Yes. We think this will be important to alert potentially unsuspecting buyers of the uncertain risk and to highlight those who are non-compliant.

Question 9: Do you think that BVD compliance should be a conditional requirement for receiving single farm payments? Options: Yes; No; Please explain your views;

- 12) Yes. To ensure the level of compliance necessary to eradicate BVD, we think it is a good idea to include a conditional requirement of compliance with the scheme for a farmer to receive single farm payments.

Question 10: Do you think that calves born from females purchased in-calf should be individually BVD tested by 40 days of age? Options: Yes; No; Please explain your views;

- 13) Yes. We suggest they be tested at the earliest possible opportunity. Calves need to be handled for ear tagging within 20 days of being born so this offers a good opportunity to carry out testing. These animals should be isolated with their dams where appropriate until testing is completed, and a negative result obtained.

Question 11: Do you think that BVD Positive herds should be allowed 40 days to arrange optional confirmatory blood sampling of suspect PIs before imposing restrictions on animals moving in to the herd? Options: Yes; No; Please explain your views;

14) Yes. Farmers should be allowed the opportunity to test before imposing restrictions. However, we suggest the period should be 21-30 days. We do not think immediate restrictions are necessarily proportionate and focus should be on testing and isolating the individual animal.

Question 12: Do you think that Phase 6 of Scotland's BVD eradication should include compulsory slaughter? Options: Yes; No; Please explain your views;

15) No. Not at this stage for the reasons stated in the consultation. Compulsory slaughter requires government compensation for each animal slaughtered and the BVD Advisory group think no compensation should be provided for PIs as the benefits of eradicating BVD from herds outweighs finishing PI animals. Compulsory slaughter of PIs may become necessary in the future with the final stages of eradication or once Scotland is BVD free. We agree that this is not necessary at this stage.

Question 13: Do you think that all the requirements that currently apply only to breeding herds should apply to all herds? Options: Yes; No; Please explain your views;

16) No. The risks are different between operations and farms as well as between beef and dairy herds. A risk assessment at herd level completed by a vet would identify areas of risk such as shared boundaries.

Question 14: Do you think that the requirement to obtain and regularly update a BVD herd status should be extended to all herds? Options: Yes; No; Please explain your views;

17) Yes. This would be a logical next step.

Question 15: Do you think that all herds with a confirmed PI should be unable to move cattle in to the herd? Options: Yes; No; Please explain your views;

18) Yes. This is to encourage PI removal in the period before compulsory slaughter is an option.

Question 16: Do you think that the requirement to house PIs should be extended to all herds? Options: Yes; No; Please explain your views;

19) Yes. It is important to house and isolate PIs to minimize the risk of transmission. However, this should come with the caveat that due regard must be given to animal welfare given the impact of extended periods of isolation on herd animals such as cattle.

Question 17: Do you think that all herds should be required to test high risk animals? Options: Yes; No; Please explain your views;

20) Yes. This should be seen as a first step to extending BVD control to all herds.