

18 November 2010

BVA response to the WAG consultation on tuberculosis in non-bovines

1. The BVA is the national representative body for the veterinary profession in the United Kingdom and has over 12,000 members. Its primary aim is to protect and promote the interests of the veterinary profession in this country, and it therefore takes a keen interest in all issues affecting the veterinary profession, be they animal health, animal welfare, public health, regulatory issues or employment concerns.
2. The BVA welcomes these proposals, which deal with the increasing problem of bTB in non-bovines more effectively within the proposed legal framework. This is especially important given the zoonotic potential of the disease. Although we appreciate that this consultation is directed specifically to camelids, goats and deer, the rise of bTB in pigs is also of growing concern.
3. Bovine TB is being identified in pigs at slaughter with increasing regularity. There are consequent business disruption repercussions for both producers and processors which are aggravated by the current lack of clear policy in this area. The National Pig Association, in conjunction with local specialist pig practitioners, is working with Defra to resolve this. BVA and its specialist division, the Pig Veterinary Society (PVS) would also welcome the opportunity to work with the WAG on this problem.
4. In response to the questions posed by the consultation, BVA would like to raise the following points:

Q1. Are the proposed arrangements for managing and preventing incidents of bovine TB in non-bovine animals appropriate and necessary? If not, please explain why and what alternative arrangements should be put in place.

5. As mentioned above, we welcome these proposed arrangements and we feel that they are proportionate and necessary. In particular we believe that Veterinary Improvement Notices will be a useful tool in helping to deal with inappropriate or lack of action by a keeper.
6. With regard to TB testing, greater understanding and validation of the tests used in these species is needed and the BVA asks that work continues to validate these tests and develop other diagnostics.

Q2. Should a regular TB testing regime or a requirement for TB Pre-Movement Testing be introduced for these non-bovine animals?

7. Not enough is known about the incidence of bTB in camelids, goats and deer and the risk of infection to cattle; although it is currently believed that the incidence and risk is low. We

therefore believe that a routine TB testing regime, including pre-movement testing is not pragmatic at the current time, and resources should focus on the problem in cattle. Instead we endorse a risk-based approach to testing, supported where appropriate, by post mortem monitoring. This approach should be kept under review to ensure that the Government can respond if circumstances change.

8. In wild deer, disease status can only be monitored by effective examination of viscera and carcasses. Although we believe that there is some training of stalkers now in place, more guidance is needed to alert stalkers to the signs of bTB.

Q3. What is your view on the proposed set figures for non-bovine animals? How might stud alpacas be defined in the Order and/or in accompanying guidance? Should there be different figures for goats depending on their age or gender?

9. Whilst we do not feel that it is for the BVA to comment on the exact figures proposed for non-bovine animals, we support the principle behind the calculation of compensation which seeks to encourage keeper compliance. The compensation system should be developed in consultation with the farming industry.

Q4. Should the proposed set figures for non-bovine animals be prescribed in the Order or should they be set by an administrative process so that they might be amended more quickly and without the need to amend the order?

10. We believe that the proposed set figures for non-bovine animals should be set by an administrative process with a periodic review.

Q5. Should the compensation paid for non-bovine animals be calculated in the way that is proposed in the draft order?

11. As mentioned above, we agree with the principle behind the method of calculation outlined in Part 3 of the draft order which gives a sliding scale for lack of compliance.

Do you agree that the appeals procedure as set out at Annex B is necessary?

12. We agree that in some cases failure to comply with an Order may be justifiable or unavoidable and that there should be an appeals procedure in place to address this. We are also happy for this procedure to be contained within the current Independent Appeals Process of the Rural Affairs Department which farmers will already be familiar with. In cases where an appeal is partly or fully successful we believe that the charge should be reimbursed.