

BVA response to: EU consultation on Animal disease notification, reporting, surveillance, eradication and disease-free status.

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 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 and the wellbeing of the profession.

Our response

2. BVA has engaged throughout the progression of the Regulation on transmissible animal diseases (Animal Health Law) and welcomes the opportunity to comment to this legislation which stems from that regulation.
3. Having consulted with BVA Specialist Divisions, we broadly welcome the majority of the proposals. However, we are concerned about the aspects of the legislation which are relevant to Mycobacterium tuberculosis/ bovine tuberculosis (bTB).
4. BVA represents the veterinary profession across the UK, where there is a varying prevalence of bTB. There is relatively high prevalence in some parts of the country. Conversely, Scotland has low prevalence and was granted Officially TB free status in September 2009.

Administrative area	Period Herd Prevalence (%)
England (total)	20.4
England (Low Risk Area)	2.5
England (Edge Area)	10.9
England (High Risk Area)	29.47
Northern Ireland	12.4
Scotland	0.2 ¹
Wales	12.5

5. Scotland has successfully maintained that status ever since by implementing strict domestic controls. However, in Scotland there are still occasional confirmed (OTFW) bTB breakdowns, the majority of which arise from a small number of purchases of otherwise high-quality cattle from higher prevalence bTB areas. They are almost invariably detected quickly and eradicated, with no evidence of recurrence.

¹ Please note that this is all OTFW breakdowns. Recent movements into Scotland where source is known are excluded from the figure used to determine OTF status which must be below 0.1% for 6 consecutive years.

6. Interventions and available resources should be targeted where the impact is most likely to result in positive outcomes. Unfortunately, the present drafting of this legislation will place greater testing burdens on farmers in the parts of the United Kingdom with the lowest incidence of bTB, redirecting resource from where it is needed most and to places where the risk is lowest.

Annex IV, Part II, Chapter 1, Section 2 – Maintenance of OTF status

7. The legislation, as drafted, would create a default for a Member State or zone which is not officially TB-free, to undertake at least annual surveillance testing. This change would not affect England's High Risk or Edge Areas; Wales or Northern Ireland where annual testing is already in place. However, the Low Risk Area of England and Scotland would be affected, with increased testing requirements being required.
8. Surveillance testing should be proportionate to the risk and mindful of the need to prioritise resource for maximum impact. We feel that the application of this legislation would not be proportionate to the incidence of bTB in the Low Risk Area of England or Scotland and would have the unintended consequence of diverting resources from other, higher priority parts of the UK TB eradication programme.

Annex IV, Part II, Chapter 1, Section 4 – Withdrawal and regaining of OTF status

9. The legislation, as drafted, would create a new requirement for herds to undergo breakdown skin tests at intervals of six months to restore OTF status following withdrawal of that status. This would mean herds would be under restriction for a minimum of 12 months. There is a derogation to this requirement which would allow minimum intervals of two months where:
 - It can be concluded that the breakdown was due to addition of an infected animal to the herd; OR
 - The breakdown was triggered by just one reactor and the herd had not had its OTF status withdrawn in the previous three years; OR
 - A whole herd test, with negative results, had been completed in the previous 12 months.
10. The proposal to extend the minimum period of movement restrictions to 12 months is an inappropriate and unnecessary burden. We are concerned that the draft legislation would place more onerous movement restrictions on OTF zones/Member States than in zones/Member States where there is a high incidence of TB. This will be challenging for Scotland and the Low Risk Area of England which would be required to undergo six-monthly short interval tests.
11. For a herd to maintain free status, the proposals would introduce the requirement to pre- or post-movement test any animals over six weeks of age moved into a herd unless they and the herd they originate from have been tested clear in the past 6 months or 12 months (depending on the required frequency of surveillance testing).
12. BVA has strongly supported requirements that cattle moved into one area from areas with a higher TB incidence are post movement tested. We have also supported the introduction of a system of pre-movement testing as a logical disease control measure. However, again this proposal would place greater burdens on farmers in the Low Risk Area of England.

Poultry

13. We would ask for clarity on the Annex 1, Sections 1 ,2 ,3. These refer to on Highly pathogenic avian influenza, Low pathogenicity avian influenza viruses and Newcastle Disease. In all cases

these sections refer to animals, rather than poultry or birds. There is a concern is the use of the term 'animal' or 'animals' implicating non-poultry species (other than wild birds which are referred to specifically also in relevant places) as having confirmed disease due these infections.

Pigs

14. There is some confusion about what the legislation will mean in practice for Porcine Reproductive and Respiratory Syndrome (PRRS) surveillance. This is regarding how PRRS is made notifiable or reportable as this is not addressed explicitly within the document. We would ask that surveillance requirements are proportionate and do not lead to an unnecessarily onerous reporting requirement.

Conclusion

15. This legislation would place additional barriers on the areas of the UK with the lowest incidence of bTB disease, including Scotland which has OTF status. We are very concerned that the proposals taken together will have the effect of disincentivising the eradication of bTB in the UK. Further the legislation will result in the redirection of scarce resources from more effective aspects of the eradication programme. Of utmost importance is the capacity of the veterinary workforce to meet this increased demand.