

BVA response to Defra

Bovine tuberculosis: consultation on proposals to help eradicate the disease in England

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, employment matters and the wellbeing of the profession.
2. We welcome the opportunity to respond to this consultation on proposals to help eradicate the disease in England. Halting the spread of bovine tuberculosis (bTB) is essential for both animal health and welfare and the profitability and sustainability of the livestock industry. It is vital that we continue to utilise every tool in the toolbox to curb this devastating disease. This includes support for control measures in cattle and simultaneous, coordinated measures in badgers.

Proposal 1

Mandatory post-movement testing of cattle moving from higher TB risk regions of Great Britain (the HRA, Edge Areas on six-monthly surveillance testing and Wales) into those parts of the Edge Area where herds are on annual surveillance testing.

3. BVA has supported the introduction of post-movement bTB testing when this has been introduced in England, Wales and Scotland to reduce the risk of spread of bTB through cattle movements. These procedures are primarily designed to protect the low-incidence regions and nations of the UK from the introduction of infection.
4. We support the proposal to extend mandatory post-movement testing of cattle moving from higher TB risk regions of Great Britain into those parts of the Edge Area where herds are on annual surveillance testing.
5. We ask government to provide further analysis to show how effective post-movement requirements have been to date at reducing new cases of bTB in lower-prevalence regions. Providing an evidence base for the extension of this policy would help maintain trust and goodwill amongst the farming and veterinary communities.
6. We believe that many of the benefits of this proposal could come from changes to behaviours relating trading and cattle movements, rather than as a direct result of increased testing. If legislative change is enacted to introduce this proposal, Government should thoroughly evaluate the effect of its introduction on farmer behaviours. It may prompt more reflection on the part of farmers, leading to fewer risky movements, or it could lead to other unintended changes, which may negate the intended benefits. We hope the introduction of the Livestock Information Service in Spring 2022 will facilitate analysis of changes in cattle movements in response to revised legislation.
7. Currently, the only type of test used for post-movement testing is the single intradermal comparative cervical tuberculin test (SICCT). SICCT has limited sensitivity and is best utilised as a herd-level test. We believe that there may also be further scope in future to utilise the more sensitive interferon-gamma blood test (IFN γ) as part of this process.

8. Consequently, government should fund, and continue to roll-out, the IFN γ test as a more sensitive supplement to the SICCT and explore the potential for wider use of IFN γ as part of the testing regime, including pre- and post-movement testing and between short interval tests.

Proposal 2

Defra should revise the current policy for using the more sensitive IFN- γ test in the HRA and Edge Area, so that in addition to persistent breakdowns, use of the test is mandatory where the below criterion is met:

- **TB breakdowns in the HRA and six-monthly testing Edge Area counties that occur within 18 months of the herd regaining TB free status following a previous OTFW breakdown.**

9. The second official (prescribed) test for bTB in cattle in the UK is the IFN γ , a supplementary blood test used in addition to the SICCT. It is approved for use in cattle by the OIE and is the only blood test currently approved in the EU to supplement the SICCT for bTB in cattle. It is used for statutory testing in the UK. The IFN γ test is more sensitive than SICCT, with around 90% sensitivity. It is, however, slightly less specific (96.6%) than the SICCT.¹
10. IFN γ has become a key part of the bTB programmes in all four administrations of the UK. BVA would like to see a wider, government-funded roll-out of this more sensitive test, as a supplement to the SICCT, to support the prompt removal of infected animals in bTB breakdown herds. There is potential benefit in using the test as a supplement to the SICCT when herds are placed under restrictions, as the IFN γ test can be deployed within the 60-day interval between Short Interval Tests (SITs), allowing infected animals to be detected and removed more quickly.
11. We welcome efforts to-date by the government to expand IFN γ capacity. We also understand that there remains a need to prioritise the use of existing capacity to where the greatest benefit can be created.
12. We support the proposal to move away from the current approach of deploying the test in new breakdown herds in badger control areas, and instead targeting herds across the HRA and the six-monthly testing parts of the Edge Area that suffer repeat breakdowns. We welcome the assurance that discretionary use of the test within badger control areas will remain, where this is deemed necessary by APHA vets.

Proposal 3

Cease the issuing of new Badger Disease Control (intensive cull) licences after 2022.

13. The government's response to the bTB strategy review "Next steps for the strategy for achieving bovine tuberculosis free status for England" sets out the plans for the next five years, including:

*"The government envisages that the current intensive [badger] culling policy would begin to be phased out in the next few years, gradually replaced by government supported badger vaccination and surveillance."*²

14. We welcomed the move to increase the use of badger vaccination in a coordinated and targeted manner. At the time of the publication of the government's response, we welcomed the inclusion

¹ De la Rua-Domenech R, Goodchild AT, Vordermeier HM, et al. Ante mortem diagnosis of tuberculosis in cattle: a review of the tuberculin tests, γ -interferon assay and other ancillary diagnostic techniques. Research in veterinary science. 2006 Oct 1;81(2):190-210. doi: [10.1016/j.rvsc.2005.11.005](https://doi.org/10.1016/j.rvsc.2005.11.005)

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/870414/bovine-tb-strategy-review-government-response.pdf

of a pilot, which must be designed to provide a rigorous evidence base for informing future policy decisions. However, more than a year after the publication of the government's response to the bTB strategy review, our questions on the effectiveness, humaneness and practicality of badger vaccination in the context of the future eradication strategy remain.

15. Government should prioritise research to evaluate the impact of badger vaccination on bTB incidence in cattle. This evidence should provide a greater understanding of this control method as part of any 'exit strategy' or as a firebreak to stop the spread of the disease into new areas. Government should develop this evidence base before moving to remove the option of badger culling.

Proposal 4

New Badger Disease Control (intensive cull) licences issued in 2021 and 2022, could, after 2 years of culling, be revoked after a progress evaluation by the CVO.

16. Badger culling should be carried out with the clear objective of reducing the incidence of bTB in cattle. We are concerned that if badger culling is not conducted in a sustained manner, this proposal could result in a smaller benefit, or even a detrimental effect, on the incidence of confirmed bTB in cattle.
17. The proposal, as currently stated, would give significant discretion to the UK Chief Veterinary Officer to determine if licences should be revoked. BVA trusts the expertise and judgement of the CVO to take these decisions using expert veterinary judgement. However, this needs to be done in a transparent way. Currently, no criteria, methodology or direction is suggested within the document as to how the CVO should apply this discretion. To provide clarity, we ask that clearer guidelines are provided for when and how the CVO would be asked to make such a determination and for the rationale for any subsequent decision to be provided.
18. We would ask government to share the evidence base that supports this proposal. Without that evidence, we are unable to support this proposal.

Proposal 5

Reduce the initial financial commitment required from the companies prior to application for a Badger Disease Control licence to the cost of three years of culling.

19. We do not support this proposal. BVA and the NFU have discussed the barriers to farmers applying for control licenses. Based on that discussion, BVA believes this proposal to reduce the financial commitment would not alleviate any actual barriers.
20. Removing barriers to cull companies undertaking activity in areas where an epidemiological need is identified is important. We would suggest that government engage with the farming community to better understand the barriers that exist and collaborate to design policies that would remove those barriers.

Proposal 6

Restrict SBC licences to a maximum of two years, and prohibit the issuing of SBC licences for previously licensed areas or areas licensed for Badger Disease Control after 2020.

21. We are concerned that issuing shorter-term SBC licences (less than four years) could have an adverse impact on the incidence of bTB in cattle.
22. As explained above, we would ask government to more actively develop the evidence base for

badger vaccination before seeking to remove the option of badger culling. This is particularly concerning with reference to this proposal, as areas currently under supplementary culling could lose the option of culling well before an evidence base for vaccination could be developed.

23. As culling is phased out, it is acknowledged that government “would need to retain the ability to cull in a targeted way where the epidemiological evidence requires it.”³ We would ask government to clarify what this ability to cull in a targeted way would look like in practice, as the licences for certain supplementary cull areas could end very soon under this proposal.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/870414/bovine-tb-strategy-review-government-response.pdf