



Llywodraeth Cymru
Welsh Government

Number: WG43511

Welsh Government
Consultation Document

A Refreshed TB Eradication Programme

Date of issue: 16 November 2021

Action required: Responses by 8 February 2022

Mae'r ddogfen hon ar gael yn Gymraeg hefyd /
This document is also available in Welsh

OGL © Crown Copyright

Overview

This consultation is seeking views on a number of enhancements to the Welsh Government's TB Eradication Programme.

How to respond

The closing date for responses is 8 February 2022.

You can respond by email to: bovinetb@gov.wales

Or by visiting our [website](#)

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Contact details

For further information:

TB Team
Office of the Chief Veterinary Officer
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Email: bovinetb@gov.wales

Mae'r ddogfen yma hefyd ar gael yn Gymraeg / This document is also available in Welsh: <https://llyw.cymru/rhaglen-ddiwygiedig-ar-gyfer-dileu-tb-2021>

UK General Data Protection Regulation (UK GDPR)

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation

If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.

Your rights

Under the data protection legislation, you have the right:

- to be informed of the personal data held about you and to access it
- to require us to rectify inaccuracies in the data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection.

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the UK GDPR, please see contact details below:

Data Protection Officer:
Welsh Government
Cathays Park
CARDIFF
CF10 3NQ
e-mail:
Data.ProtectionOfficer@gov.wales

The contact details for the Information
Commissioner's Office are:

Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: 01625 545 745 or
0303 123 1113
Website: <https://ico.org.uk/>

Contents

1. Foreword by the Chief Veterinary Officer for Wales
2. The disease picture
3. Regional approach to TB Eradication
4. Eradication targets
5. TB testing
6. Informed Purchasing
7. Payment for TB affected cattle
8. Explore prohibiting the feeding of unpasteurised milk to livestock on OTFW premises
9. TB and non-bovine species
10. Governance
11. Other questions
12. Next steps
13. Annex 1
14. Annex 2 - Glossary

1. Foreword by the Chief Veterinary Officer for Wales

We first introduced a bovine TB Eradication Programme for Wales in 2008 and since then we have been on a journey with the ultimate goal of being recognised as being an Officially TB Free region of the United Kingdom. We knew there was a long and sometimes bumpy road ahead of us but we have remained steadfast in our commitment and determination to rid Wales of a disease which has far reaching repercussions throughout the Welsh farming industry.

Year on year we have made enhancements to our programme and introduced many fundamental policies which changed the TB landscape across Wales and laid foundations for the future. For example in 2010, we introduced annual TB testing for every cattle herd in Wales. Seen as the cornerstone of our Programme, we continue to test all cattle herds at least annually, in order to find disease quickly. In 2012, the Intensive Action Area was established in south west Wales where, in addition to enhanced cattle control measures including 6 monthly herd testing, we began a 5 year badger vaccination programme. Despite only being able to vaccinate badgers for 4 out of the 5 years due to the global shortage of the BCG vaccine in 2015, significant and sustained inroads in TB incidence have resulted in this area. 2013 saw the introduction of Cymorth TB, providing free support to farmers' by their own private vet for new TB breakdown herds, and then in 2018 broadening this provision to other categories of herds. 2014 marked the beginning of the All Wales Badger Found Dead Survey – a survey continues today and provides invaluable information about bovine TB levels in badgers. There are many more examples of initiatives which have changed the way we deal with bovine TB in Wales and provide invaluable evidence which has shaped our Programme.

In 2017, after thorough consultation, we published a refreshed [TB Eradication Programme](#) and [Delivery Plan](#). The TB Eradication Programme set out our long term vision for the eradication of bovine TB in Wales, setting out the four key principles of infection disease control upon which the programme is based: Keep it Out, Find it Fast, Stop it Spreading and Stamp it Out. This vision and the foundation of our programme remain the same today. The TB Eradication Programme introduced the concept of regionalisation of Wales for TB control purposes, creating Low, Intermediate and High TB Areas. We continue to take this regional approach, tackling the individual drivers of disease in each area, and responding flexibly to the changing disease picture on the ground. The Delivery Plan included the provision of bespoke Action Plans to persistent TB breakdown herds, introduction of Post-Movement Testing in the Low TB Area and introducing a cap on TB payments.

The latest long term statistics, which are set out in this document show a promising picture, however, there is still more to be done. We are seeing increases in TB incidents in previously relatively low TB incidence areas and this is worrying. Now is the right time to be stepping up a gear across the whole programme, while also addressing emerging TB hotspots.

We have learned a lot about TB eradication over the past 13 years, but a key aspect has remained a constant. TB eradication will not be achieved without a partnership approach with our key stakeholders – farmers, representative bodies and the veterinary profession. Through this consultation, we are looking to you to help shape

our future policies and initiatives and share your views on areas we need to strengthen. Our next move will be key to the success of the Programme and I look forward to hearing your views.

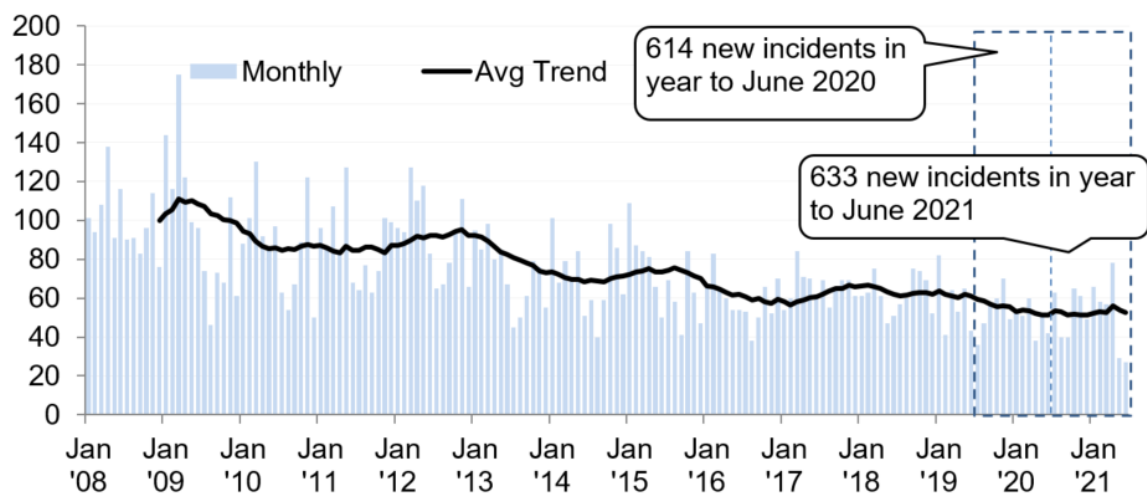
2. The disease picture

Since the TB Eradication Programme began in 2008 we have made progress towards achieving our goal with a downward trend in the number of new TB incidents along with long term decreases in incidence and prevalence.

The monthly figures for 2008 to June 2021 are as follows.

Figure 1: New herd incidents in Wales, January 2008 to June 2021

New herd incidents in Wales



Source: Defra TB statistics at 15 September 2021

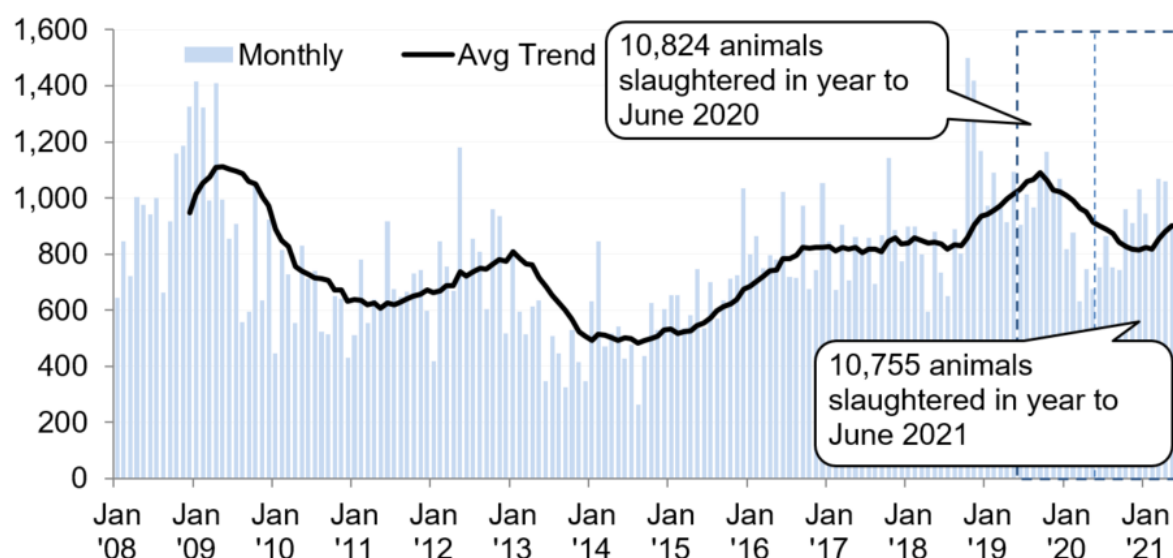
Figure 1 shows the number of new herd incidents has been on a long term downward trend since the peak in 2008, where there were 1,198 new incidents during the year. During 2020, there were 613 new herd incidents in Wales, this is the lowest annual figure since 2001.

At a regional level there has been good progress in some TB Areas with a downward trend in new herd incidents in both High TB Area East and High TB Area West. In both of these areas we saw the lowest number of annual new herd incidents during 2020 since 2001.

However, there has been a deterioration in disease in the Intermediate TB Area North and Low TB Area with new measures being introduced in these areas during 2021.

Figure 2: Animals slaughtered for TB control in Wales, January 2008 to June 2021

Animals slaughtered for TB control in Wales



Source: Defra TB statistics at 15 September 2021

Figure 2 shows the number of cattle slaughtered due to TB controls with the overall trend variable. Much of the rise since 2014 is attributable to increased use of high-sensitivity testing, aimed at identifying and removing infected animals swiftly. For example, gamma-testing, removal of Inconclusive Reactors (IRs) and severe interpretation of the skin test have all been used with the intention of clearing up infection and reducing the risk of the disease spreading and breakdowns recurring.

Following review and availability of enhanced testing (IDEXX antibody test), from January 2020 (and fully implemented in February 2020) we introduced a revised policy applied to inconclusive reactors in action plan herds. This has led to an initial decrease with severe IRs tested with both a parallel Interferon-gamma test and an IDEXX Antibody test instead of being removed at the skin test.

All Wales Badger Found Dead Survey

Since September 2014 to July 2021, bovine TB in badgers found dead has been monitored across Wales. Table 1 and Figure 3 set out the results of the All Wales Badger Found Dead Survey. The results for September 2014 to end of July 2021 are:

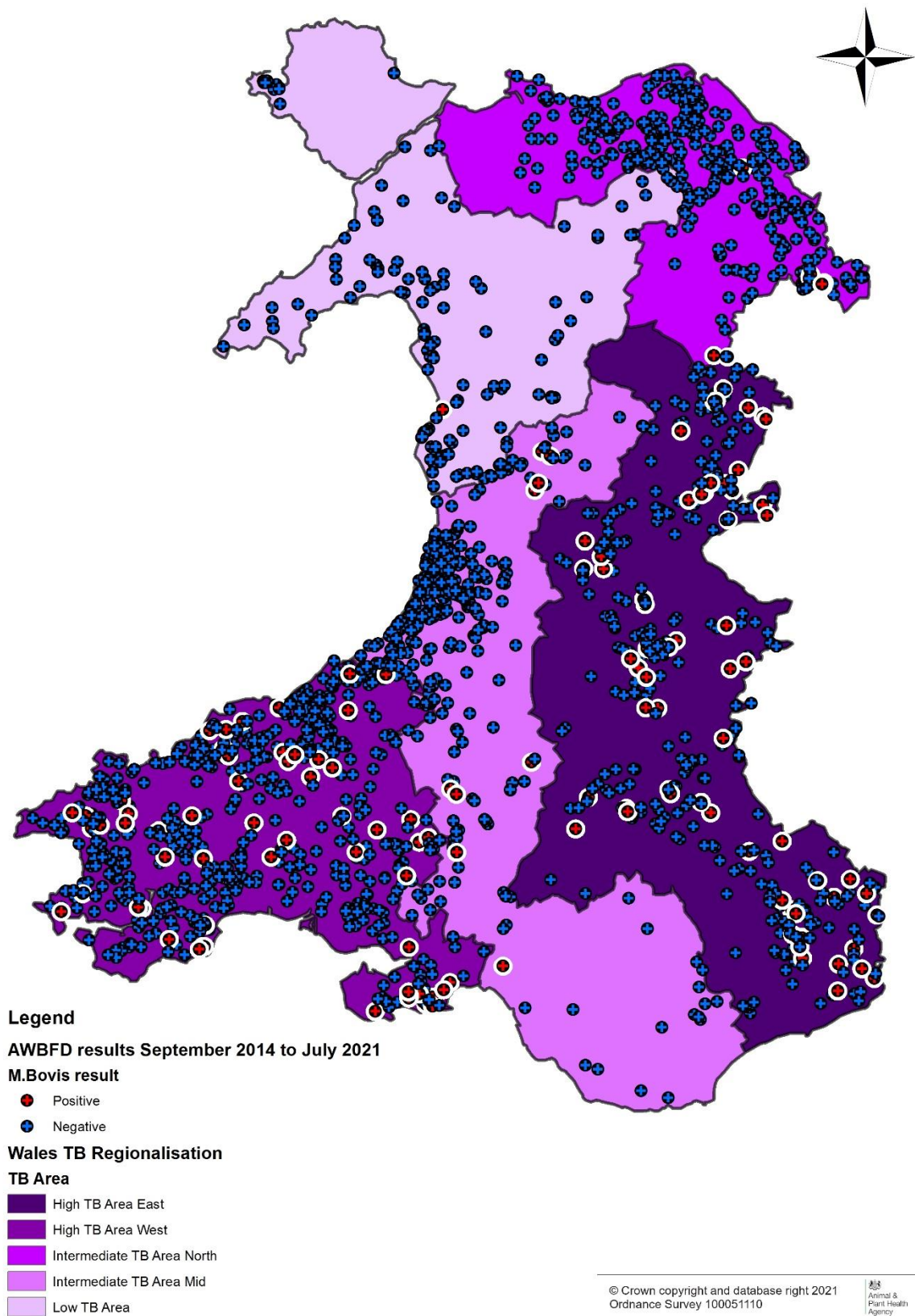
Table 1: All Wales Badger Found Dead Survey submissions and results by TB Area, September 2014 to July 2021

TB Area	Positive submissions	Negative submission	Total submissions	Percentage positive
High TB Area East	71	311	382	18.6%
High TB Area West	54	499	553	9.8%
Intermediate TB Area Mid	10	404	414	2.4%
Intermediate TB Area North	8	180	188	4.3%
Low TB Area	1	280	281	0.4%
Wales	144	1,674	1,818	7.9%

Source: All Wales Badger Found Dead Survey with results up to July 2021, correct as at 4 November 2021

Of the 1,818 badger carcasses tested 144 (7.9%) were positive for *M. bovis*. There is one sample from July 2021, which is currently pending a result and has not been included in the table above. Figure 3 shows there are varying levels of infection in badgers in Wales.

Figure 3: All Wales Badger Found Dead Survey submissions and results, September 2014 to July 2021



3. Regional approach to TB Eradication

In 2017, the Welsh Government began a regional approach to TB Eradication with the creation of Low, Intermediate and High TB Areas. The disease situation and risks are different in each of the TB areas. The criteria for each area are:

- Low TB Area: The area where less than 0.2% of herds have had a TB incident in a year.
- Intermediate TB Area: The areas where less than 5% but more than 0.2% of herds have had a TB incident in a year.
- High TB Area: The areas where more than 5% of herds have had a TB incident in a year.

[A Wales TB Regionalisation map showing the TB Areas can be found on Data Map Wales.](#)

The disease situation and risks are different in each of the areas. Having a regional approach allow us to tailor different disease control and prevention measures applied in each of the areas.

Low TB Area

Area Description

The area is in north-west Wales covering the counties of Anglesey and Gwynedd and north west Clwyd. Beef herds predominate with many producers purchasing store cattle and selling finished cattle. The majority of cattle movements remain within the area.

The current disease situation

- The number of new breakdowns and the percentage of herds under restriction due to TB (herd prevalence) has been very low in the Low TB Area over many years with herd prevalence being consistently below 1%. However, this began to increase in March 2021 and remains at 1.4% at the end of June 2021.
- From the latest All Wales Badger Found Dead Survey figures from September 2014 to July 2021, there was one positive badger carcasses reported resulting in a prevalence rate of 0.4%.

What is driving the disease?

- Evidence has emerged of an increased number of new TB incidents in localised areas of the Low TB Area, ("TB hotspots") in the Denbigh and Conwy areas and a smaller area in Pennal.
- The key recent finding is that these new incidents have been locally linked. For many years, new incidents in the Low TB Area have been considered to be mainly of purchased origin, with records of cattle movement from an area of higher TB incidence.
- However, there is now epidemiological evidence of breakdowns in these hotspot areas sharing a similar genetic strain of *Mycobacterium bovis* (*M. bovis*) indicating local disease spread. In addition, local cattle movements and other

close business relationships have been identified linking some of these breakdowns together. The introduction is likely to have been a movement from a higher risk TB area causing a new TB breakdown in 2017 and disease spreading from there.

What we are doing

- In response to this emerging disease situation and to protect the long-term health status of the Low TB Area, a number of new measures were introduced in a phased approach between 1 June and November 2021.
- A key change is the movement of the spatial units CL1, CL2 and GW1 into the Intermediate TB Area North. A consequence of this is the requirement to Pre-Movement Test (there is no requirement to Post-Movement Test).
- In Pennal as well as CL1, CL2 and GW1, additional contiguous testing will be implemented as well as the offer of free “Keep it Out” veterinary visits to keepers whose herds test negative to a contiguous test.
- Farms located within one of the affected areas, were sent a letter at the beginning of October to remind them of the temporary changes.
- The sensitivity* of testing both within breakdowns and in some key surveillance tests is being increased
- Additional surveillance testing in clear testing herds and in herds neighbouring a breakdown has been introduced
- Aiming to improve communications on practical measures that can be implemented to reduce the likelihood of disease entering a herd and reduce disease transmission within a herd.

**Sensitivity of testing is the likelihood a test will identify an infected animal as positive. When test sensitivity is increased, specificity (the likelihood of an uninfected animal testing as negative) reduces.*

What we aim to achieve

- By increasing surveillance and increasing the sensitivity of testing in the spatial units principally affected, we hope to identify infection earlier within herds and within individual animals and reduce the likelihood of disease remaining in the herd when restrictions are removed at the end of a breakdown.

Intermediate TB Area North

Area description

The area is located in north-east Wales and includes the part of Clwyd which is not included in the Low TB Area. The area has a high proportion of dairy herds and dairy cattle compared to other areas. Around half of all movements into the area are from the adjacent English counties (Cheshire and Shropshire) which are classified as ‘High Risk Areas’. Along with the predominance of dairy herds, this is likely to be because some farms have land either side of the border.

The current disease situation

- Herd prevalence in this area has been increasing since 2017 with 8.1% of herds currently under restrictions because of TB.
- Herd incidence at the end of Q2 2021 was the second highest in Wales and currently higher than the High TB Area East.
- The area has a high proportion of recurrent breakdowns within 18 months of restrictions being lifted compared to most of the other areas.
- The worst affected part of the Intermediate TB Area North remains the cluster near the border in England with spatial units CL7 and CL8 which accounts for less than 30% of Intermediate TB Area North cattle herds but 77% of open incidents and 59% of new breakdowns at the end of Q2 2021.
- From the latest All Wales Badger Found Dead Survey figures from September 2014 to July 2021, there were 8 positive badger carcasses reported resulting in a prevalence rate of 4.3%.

What is driving the disease?

The majority of *M. bovis* isolates from breakdowns outside CL7 and CL8 are closely related to those in endemic areas in the border cluster covering parts of Wales and England. Molecular epidemiology also points to local movement of cattle into the cluster near the English border (CL7 & CL8) from adjacent endemic TB areas of Shropshire and Cheshire which has driven further escalation. Residual and undisclosed infection (where infected animals are not readily identified through surveillance tests) is also a major factor. Finally, local transmission is an important aspect, especially in the CL8 spatial unit.

Disease characteristics supporting these statements include:

- The recurrence rate is relatively high and both reintroduction of the disease through cattle movements from the adjacent Edge and HRA as well as residual infection, have led to new incidents with identical or very similar *M. bovis* isolates as in previous breakdowns.
- Genetic sequencing has suggested transmission across county and country borders with resulting joint home ranges of the TB genotype, incorporating parts of west Shropshire and southwest Cheshire.
- In the last two years there have been several breakdowns with a large number of reactors.
- On passive wildlife surveillance evidence there was no recognised significant reservoir of the disease in the badger population until recently as five of the seven positive badgers found in the Intermediate TB Area North were submitted in the last two years.

What we are doing

- The sensitivity of testing both within breakdowns and in some key surveillance tests is being increased
- Additional surveillance testing in clear testing herds and in herds neighbouring a breakdown has been introduced

- Aiming to improve communications on practical measures that can be implemented to reduce the likelihood of disease entering a herd and reduce disease transmission within a herd.

What we aim to achieve

- By increasing surveillance and increasing the sensitivity of testing in the spatial units principally affected, we hope to identify infection earlier within herds and within individual animals and reduce the likelihood of disease remaining in the herd when restrictions are removed at the end of a breakdown.

What needs to be done?

- We need to protect the area from TB being introduced through cattle movements from higher disease areas and to deal with the level of disease already present. There are currently few areas with higher prevalence and incidence than the cluster in the Intermediate TB Area North near the border with England. To do this we need to alter the cattle controls to make sure they are sufficient to prevent disease entering the area and to eliminate the infection which exists.
- Local transmission with wildlife involvement cannot be ruled out and biosecurity measures applied in endemic areas should be followed.
- As infection has been found in badgers collected during the Badger Found Dead survey, badger vaccination could play a role to help prevent the disease becoming established in the badger population,
- The three Phase 2 Intermediate TB Area North measures introduced are:
 - Measure 1: expand provision of bespoke Individual Herd Action Plans to TB breakdowns recurrent up to and including the 6 month test at the Intermediate TB Area North level
 - Measure 2: introduce an Interferon-gamma test (the “gamma test”) as a Post Movement Test in the two spatial units most affected (CL7 and CL8)
 - Measure 3: apply severe Interpretation in herd breakdowns in CL7 and CL8 throughout the breakdown.

Intermediate TB Area Mid

Area description

This area runs through the middle of Wales and comprises parts of Glamorgan, east Carmarthenshire, north Ceredigion and north Powys. It is a predominantly upland area primarily containing small beef herds.

The current disease situation

- There is a medium level of disease in this area, compared with other areas, with around 2% of herds currently under restrictions because of TB.
- This area has the lowest incidence and prevalence after the Low TB Area and has been broadly stable for a number of years.
- The majority of herds are beef herds, however, around 30-40% of breakdowns at any particular moment are dairy herds.

- There is considerable heterogeneity in spatial disease patterns with clustering of disease in dairy herds closer to the High TB Area West in Ceredigion and in Carmarthenshire and very few TB incidents in the almost entirely beef cattle in East Carmarthenshire.
- From the latest All Wales Badger Found Dead Survey figures from September 2014 to July 2021, there were 10 positive badger carcasses reported resulting in a prevalence rate of 2.4%.

What is driving the disease?

- Cattle movement into the area appears to be a high risk factor for the introduction of TB;
- Many new breakdowns are found through contiguous testing which suggests TB is also being spread locally either by direct or indirect contact with neighbouring cattle or wildlife; especially in Ceredigion and East Carmarthenshire.
- This area has some suitable habitats which allow badgers and other wildlife to thrive; while only two positive badgers were found dead in the 2014-16 survey another seven were collected in the subsequent four years, most of which in North Powys.

What are we doing

- No additional measures are being introduced specifically to tackle disease in this area
- We are keen to ensure that the quality of OV testing is high in this area following the finding of a higher than expected number of slaughterhouse cases.
- Aiming to improve communications on practical measures that can be implemented to reduce the likelihood of disease entering a herd and reduce disease transmission within a herd.

What needs to be done?

- We need to protect the area from TB being introduced through cattle movements from higher disease areas and to deal with the level of disease which is already there. To do this we need to alter the cattle controls to make sure they are sufficient to prevent disease entering the area and to eliminate the infection which exists there.
- Biosecurity on farms is important to protect from any local spread and badger vaccination could be explored to identify if it could play a role to help prevent the disease becoming established in the badger population.

What we aim to achieve

- We anticipate, if the disease situation in targeted spatial units in this area is maintained at a low level, we can consider transferring them into the Low TB Area.

High TB Area West

Area description

The area forms a rough triangle in the south west of Wales including Pembrokeshire and parts of Carmarthenshire, Ceredigion and Swansea. The majority of herds in the area are small beef farms. However there are more dairy cattle in total because the area contains a large number of large dairy herds.

The current disease situation

- TB has been in some parts of the area since the National Eradication Campaign started in 1935.
- It has one of the highest rates of TB in Wales with 9.6% of all herds under restrictions because of TB at the end of Q2 2021 although this is down from 13.9% at the beginning of 2009.
- Although the High TB Area West has the highest herd incidence of the five TB Areas, incidence at the end of Q2 2021 is the lowest ever recorded in this area in any quarter 2 period since the Eradication Programme was established.
- The annual number of new incidents during 2020 was the lowest figure in this area since 2001 and this has continued to fall into 2021 with a 2% decrease in new incidents in the latest 12 months to June 2021 compared to the previous period.
- It is the area which has the most severe breakdowns in terms of length of time under restrictions and the number of reactors per breakdown.
- Many reactors have been Inconclusive Reactors (IRs) in the past.
- Our badger found dead survey has confirmed the presence of TB in a proportion of the local badger populations, but this is not as high as in other areas of Wales.
- The Intensive Action Area is no longer the worst area in Wales for incidence and prevalence. At the start there were 88 open cases in the IAA in 325 herds (with herd prevalence at 27.1%). At the end of March 2019 there were 38 herds under restriction in 269 live herds (14.1%), constituting a decrease of 48%.
- The comparable figures for the reference area are 142 open cases in 1,250 herds (11.4%) at the beginning and 97 in an estimated 1,130 herds (8.6%) at the end of Q1 2019, representing a 23% decrease.
- These are encouraging signs which support the view that over time, the range of measures applied within the IAA has had a positive impact on disease trend.
- Whereas the disease picture appears to be improving in most parts of the High TB Area West, there are smaller areas in Pembrokeshire that appear to buck this trend.
- From the latest All Wales Badger Found Dead Survey figures from September 2014 to July 2021, there were 54 positive badger carcasses reported resulting in a prevalence rate of 9.8%.

What is driving the disease?

- Dairy farming features highly and herds in the area are considerably larger than the national average. Several management features specific to dairy farming larger herds increase the risk of TB. These include relatively long residency of

milking cattle, as well as more social contacts in more confined areas compared to suckler herds or beef fattening operations.

- Local spread seems to be a significant factor in the area and this is supported by around a third of new incidents in 2020 disclosed by contiguous surveillance testing. This suggests there is a considerable infection pressure from outside the herd.
- For cattle moved onto holdings in the area, the majority originated from the High TB Area West.
- There is a high number of recurring breakdowns which suggests either a high reinfection rate or infection which persists in the herd even after it is declared OTF.

What needs to be done?

- This area has more animals reacting to both avian and bovine tuberculin than any other area. We aim to understand whether co-infections with other mycobacteria, such as the organism responsible for Johne's disease are having an effect on test diagnostics and understand better how we can overcome this.
- Aiming to improve communications on practical measures that can be implemented to reduce the likelihood of disease entering a herd and reduce disease transmission within a herd.

Controls are necessary to tackle the ways in which the disease spreads within and between herds from the known sources of infection:

- Reduce the risk of infection spreading through cattle movements and from infected badgers;
- Find infected cattle as early as possible;
- Remove disease to stop it from infecting others within the herd and other herds;

What we aim to achieve

- The short-term aim for this area is a continuing reduction in the number of breakdowns and the severity of each breakdown (measured by the length of time under restrictions).
- A reduction in the recurrence rate.
- Another short-term aim for this area is to deal with the number of 'chronic' herd breakdowns. These breakdowns include those which are persistent in terms of duration, but also comprise incidents with recurring infection.
- Over the longer-term if the disease situation in this area improves, we can consider it becoming an Intermediate TB Area, provided incidence and prevalence fall to a level which is comparable with the existing Intermediate TB Areas.

High TB Area East

Area description

The area runs along the border, from north Powys to Gwent. The majority of cattle movements are local, from within the area or from the neighbouring counties in

England where TB is also endemic. The area has a large proportion of beef suckler herds.

The current disease situation

- 5.2% of herds were under TB restrictions at the end of Q2 2021 compared to 9.7% at the beginning of 2009.
- We saw the lowest annual number of new TB incidents in the area during 2020 since 2001.
- This trend has continued into 2021 with a 9% decrease in the number of new incidents in the latest 12 months to June 2021.
- The majority of breakdowns have a small number of reactors and last for less than a year, most likely as a result of it being a predominantly beef area. However, there are a few herds, predominantly large dairy herds, with severe breakdowns which last for up to five years with some going beyond 10 years.
- Almost a quarter of closed breakdowns in 2018 suffered a subsequent breakdown within two years, which is lower than the previous two years (2016 and 2017) and also lower than the High TB Area West.
- From the latest All Wales Badger Found Dead Survey figures from September 2014 to July 2021, there were 71 positive badger carcasses reported resulting in a prevalence rate of 18.6%.

What is driving the disease?

- It is likely the high number of local movements result in the movement of undetected TB infected cattle.
- Recurrence of TB breakdowns is high within the area which may be a result of re-introduction due to reinfection or infection remaining within the herd after restrictions have been lifted.
- Around 45% of TB breakdowns discovered during 2020 were identified via contiguous testing and suggests local spread is occurring by direct or indirect contact.
- The All Wales Badger Found Dead survey has confirmed the disease is present in a higher proportion of the local badger populations than in any other Welsh TB Area.
- There is some evidence of a low level of infection in other wildlife such as deer and wild boar in east Monmouthshire.

What needs to be done?

- Better understand local disease spread in this area
- Aiming to improve communications on practical measures that can be implemented to reduce the likelihood of disease entering a herd and reduce disease transmission within a herd.

Controls are necessary to tackle the ways in which the disease spreads, within and between herds, from the known sources of infection:

- Find infected cattle as early as possible;
- Remove disease to stop it from infecting others within the herd and other herds;

- Reduce the risk of infection spreading through cattle movements and from infected badgers;

What we aim to achieve

- Over the short-medium term move specific spatial units into the Intermediate TB Area, providing they continue to show levels of disease that match those required for such a change.
- The short-term aim for this area is to continue the reduction in the number of breakdowns and the severity of each breakdown (measured by the length of time under restrictions).
- Over the longer-term if the disease situation in this area improves, we can consider it becoming an Intermediate TB Area, provided incidence and prevalence fall to a level which is comparable with the existing Intermediate TB Areas.

4. Eradication Targets

TB eradication targets for Wales and interim targets for each TB region were announced in December 2017 – which, if achieved, will see Wales become officially TB free between 2036 and 2041.

Interim targets, covering 6-year periods, were set for each of the TB Areas. These targets specify overall reductions in herd incidence as well as the transfer of Spatial Units from higher incidence areas to lower incidence areas.

The first regional targets cover the period from 31 December 2017 to 31 December 2023. At the end of each 6-year period we will assess progress to date and set milestones for the following period. Spatial Units will transfer from higher to lower incidence areas on the basis of improved disease trajectory over the previous period and vice versa if there is a deteriorating disease picture. As part of the 6-yearly review process it may also be appropriate to review and, if necessary, adjust the national eradication target on the basis of up to date evidence.

There has been promising progress in the first half of the first 6-year interim target with an 18% decline in incidence in the high incidence areas and two out of three spatial unit targets set in 2017 showing a disease trajectory consistent with a lower risk designation over the first three years.

We have seen slower progress in the intermediate incidence areas in the first three years of the interim target with a reduction of 4% in incidence.

We continue to review the data on an annual basis as we approach the second half of the first milestone ending in 2023. We can only achieve our targets with co-operation and dedication from all parties involved in our TB Eradication Programme. We all need to work together to make progress.

5. TB Testing

Background and reasons for change

Pre (PrMT) and Post (PoMT) Movement TB testing are deployed to help reduce the risk of the spread of TB through movements of cattle. Movements from Wales and from the TB Regions within Wales run at a significant level every year (see Table 1)

Table 2: Number of cattle moves onto Welsh holdings excluding animals younger than 42 days old, 2016-2020

	2016	2017	2018	2019	2020
High TB Area East	56,968	58,615	65,486	63,657	60,364
High TB Area West	69,649	78,575	75,948	72,404	72,329
Intermediate TB Area Mid	36,420	41,394	44,318	39,996	41,136
Intermediate TB Area North	22,523	23,320	24,938	20,285	20,114
Low TB Area	77,004	84,084	99,042	93,569	97,169
Wales	262,564	285,988	309,732	289,911	291,112

Source: British Cattle Movement Service (BCMS) data provided by APHA

The movement of cattle with undetected infection is the most likely way disease spreads to new areas. In particular, movements of cattle from high bovine TB incidence areas of Wales, and wider GB, pose a substantial risk of introducing the infection from one area to another including into low, or lower, incidence areas.

While it is not possible to fully eliminate the risk of TB spreading through undetected infection, ensuring cattle moved into a herd receive a PrMT, and/ or a PoMT will reduce the likelihood of introducing this disease into new areas and herds.

Movement tests reduce the risk of spreading TB between herds and, currently, only the skin test at standard interpretation can be used as a PrMT or PoMT. These tests are arranged by and paid for by the herd owner in consultation with their private vet. However, routine TB surveillance tests, paid for by the Government can also count as a PrMT so long as the movement occurs within 60 days of day 1 of the test.

PoMT must be carried out between 60 and 120 days after the movement on to the premises. In Wales, cattle which need a PoMT must not be moved from their new location until the test has been completed 60-120 days after arrival, unless the move meets one of the exemptions.

Existing legislation allows for a number of exemptions enabling movements to take place without a PrMT/PoMT e.g. movements to slaughter, movements for veterinary treatment.

The Welsh Government sees PrMT and PoMT as essential risk reduction measures which are making a meaningful contribution to disease eradication in Wales. Expansion of the requirements to further protect herds and areas is seen as necessary.

Proposed areas of change:

A. Legal requirement for farmer paid PrMT from herds in the Low TB Area.

Currently, existing legislation states PrMT is not required for cattle movements from herds located in the Low TB Area but movements into the Low TB Area from higher TB areas require a PoMT.

This measure was put in place in 2017 based on the fact the majority of TB breakdowns were at the time considered to be the result of undetected infection brought in through cattle movements from higher risk TB areas. However, recent epidemiological analysis has recognised local movements within the Low TB Area have contributed to the spread of disease in the Denbighshire and Vale of Conwy areas, and re-introduction of PrMT would help curtail this spread.

Questions

1. Do you agree with this proposal? Please explain your reasons.
2. Cattle entering the Low TB Area from higher incidence areas need a clear PrMT. Do you agree cattle moving into the Low TB Area from a higher incidence area should also require a PoMT on arrival? Please explain your reasons.

B. Legal requirement for farmer paid PoMT for all cattle movements to holdings in the Intermediate TB Areas from High TB Areas, the High Risk Area and N. Ireland.

As we seek to protect the disease status of the Intermediate TB Areas of Wales and to ensure they meet the targets the Welsh Government has set for their eventual integration into the Low TB Area it is proposed animals bought into these areas from higher TB areas are PoMT. A PrMT in the herd of origin may not identify an animal in the early stages of infection when tested, and cannot identify cattle which become infected after the test has been completed. There is already a requirement for herds in the Intermediate TB Areas to PrMT. This change is aimed at:

- Identifying disease earlier in herds which have made riskier purchases; and
- Discouraging purchases from higher TB incidence areas

The Intermediate TB Area North has had a higher plateau level of disease prevalence (number of open TB cases at any one time). The earlier disease can be identified in a herd, the higher the likelihood of an earlier return to disease free status.

Questions

3. Do you agree cattle moving into the Intermediate TB Areas from higher TB incidence areas should have a PoMT? Please explain your reasons.

C. Explore the introduction of farmer paid PoMT for cattle movements from an identified TB Hotspot, or an identified high risk herd dispersal.

The Welsh Government proposes to explore the potential for PoMT to be temporarily introduced for cattle moving from emerging TB Hotspots. Such a policy would allow the Welsh Government to require the PoMT of cattle moved from an identified hotspot or high risk herd, before the cattle are mixed with the rest of the herd. This might include TB hotspots outside Wales, such as the hotspot which emerged in the Shap area of Cumbria and movement of animals following a dispersal sale of a high risk herd, identified as having seeded disease in a number of different parts of GB. It is proposed PoMT would be used infrequently and exist on a temporary basis.

Questions

4. Do you agree with Welsh Government exploring the temporary introduction of PoMT of cattle originating from an identified TB Hotspot, or high risk herds? Please explain your reasons.
5. Where do you feel this policy would have the most impact? (For example High TB Areas, Intermediate TB Areas or Low TB Area).

D. Not allowing a herd clearing test as a PrMT as we do in persistent herd breakdowns.

The clearing TB test is a test which is used at the end of a breakdown to determine if a herd can be released from TB restrictions. The requirement for an additional test prior to movement of animals, 42 days and older, is currently only applied in circumstances where a herd has been under restrictions for 18 months or longer (i.e. is a persistent TB breakdown). Currently a keeper of a persistent herd breakdown will have to wait a further 60 days after restrictions are lifted, and complete a PrMT before they can move or sell those animals.

Extending the period before these animals can move and requiring an additional clear test increases the likelihood of identifying undisclosed infection remaining in the herd.

It is proposed, therefore, policy is amended so a breakdown clearing test can no longer be used as a PrMT. A further clear test would be needed for animals of 42

days and over, before a movement from any post-breakdown premises is allowed for PrMT purposes.

Questions

6. Do you agree with this proposal? Please explain your reasons.
7. Where do you feel this policy would have the most impact? (For example High TB Areas, Intermediate TB Areas or Low TB Area, or in specific circumstances).

E. What alternatives exist with regards which test(s) can be used for PrMT?

The Welsh Government is considering options for how we undertake PrMT and PoMT, including which test is used.

There are a number of options, including maintaining the status quo, but also use of the skin test at a different interpretation, the gamma test and/or the IDEXX test as a PrMT. A change to testing may well reveal a range of consequences, so any changes would need to be made in light of those – and animal keepers would need to accept such a payoff existed.

A perfect test, or a perfect combination of tests requires 100% sensitivity i.e. all infected animals are identified as positive by the test and 100% specificity i.e. all uninfected animals are identified as negative to the test (no “false positives”). The problem is there is no perfect test, or test combination available.

If a test, or test combination, is not sensitive enough it will miss too many infected animals, while if it is not specific enough it will produce too many false positives. There is a trade-off between sensitivity and specificity, as one is increased, the other falls.

Epidemiological analysis advises animals which have been clear on a skin test at standard interpretation can and do lead to new TB breakdowns in previously TB free herds.

This is no surprise, as the skin test at standard interpretation has a lower sensitivity of 81% (ranging from 50-90%), in contrast to its very high specificity of 99.98% (1 in 5000 false positives). A sensitivity of 80% means 2 in 10 infected animals are not identified as positive by the test.

There is a strong case for increasing the sensitivity of PrMT, with the trade-off being a reduction in specificity. A testing regime can be used which will achieve this, but not without consequences.

Questions

8. Do you agree with the statement *'the test used as a PrMT should be more sensitive and therefore more likely to identify truly infected cattle but acknowledge this would be at the expense of identifying more false positive cattle'*? Please explain your reasons.
9. Do you acknowledge that if blood testing (gamma or IDEXX) testing is deployed as a PrMT, there may be an additional cost to testing, which could not be met by Government? Please explain your reasons.

F. Legal requirement for farmers not to move cattle between test day 1 (day of injection known as TT1) and test day 2 (day of the reading of the test known as TT2) and between blood testing and receiving results.

This proposal seeks to rectify a situation whereby animals are allowed to move off a holding between the injecting of tuberculin (TT1) and the reading of that test (TT2) and also between blood testing and receiving results. Clearly such moves can seriously complicate the management of a surveillance regime and may result in the movement of potentially infected animals from holding to holding.

The Welsh Government proposes the following:

In an unrestricted herd, an animal is not allowed to move between TT1 and TT2 of the skin test, or between a blood test and receipt of results, with the exception of:

- i. Any clear testing animal direct to slaughter, or a slaughter gathering under licence;
- ii. Any animal licenced by the Animal and Plant Health Agency (APHA).

Question

10. Do you agree with the proposed approach? Please explain your reasons.

G. Consent to collect a sample for the purposes of TB testing or perform a test on a sample

The TB (Wales) Order 2010 (as amended) specifies:

No person may perform a test for tuberculosis on a bovine animal except with the written consent of the Welsh Ministers and a person to whom any such consent is given must report the results immediately to the Welsh Ministers.

It is proposed the prohibitions in the TB (Wales) Order 2010 (as amended) are expanded to include sampling and testing on samples taken. This is to ensure authority is sought from the Welsh Government to collect a sample, perform a test, perform a test on any sample and to ensure results from such tests are immediately reported. There is currently a risk samples could be taken and/or tested for TB and without the Welsh Government's knowledge and there could therefore be difficulty in receiving the results and acting upon them. This would pose a risk to disease control and eradication.

Question

11. Do you agree with this approach? Please explain your reasons.

6. Informed Purchasing

Background and reasons for change

Across Wales, bought-in cattle can be a source of new infection. If we are to eradicate TB, keepers need to take greater responsibility for managing this risk. To help with this we are encouraging keepers to follow "Informed Purchasing" guidelines, which aim to encourage provision of information about the TB testing history of an animal and the herd it comes from at the point of sale. By taking account of this information keepers can make a more accurate assessment of the TB risk level of cattle they are buying. For example, during 2019, herds with a history of TB within the previous three years were around four times more likely to have a new incident than herds with no history of the disease and buying cattle from these herds represents more of a risk than buying cattle from herds which have never had TB.

Despite the controls we have in place, the epidemiological evidence suggests bought-in cattle continue to be a primary source of new infection. We know, in some areas, the risk posed by cattle movements can be substantial. From Disease Report Forms (DRFs) completed by the case vet, we have found in the Low TB Area 80% of confirmed breakdowns can be primarily attributed to cattle movements. Even in the High TB Areas, around a third of confirmed breakdowns are primarily the result of cattle movements. It is therefore vital farmers give consideration to where they source cattle and their TB history.

During 2020 high numbers of high risk moves occurred onto holdings in Wales, as outlined below:

- 14% of cattle (or 42,000 cattle) moved onto holdings in the Low and Intermediate TB Areas were sourced from holdings in a higher incidence area;

- 38% of cattle moved onto holdings in the High TB Areas of Wales were sourced from holdings in similarly high risk areas of England and Wales;
- 30% of cattle brought onto Welsh holdings were from high risk herds,
- 18% of cattle brought onto Welsh holdings from other Welsh holdings were purchased from herds which had an incident closed within two years.

A high risk herd is defined above as a herd, which has had a TB incident closed:

- Within the last two years, or
- Within the last three to five years, but had purchased from a herd with a TB incident closed within two years.

Since 2016, we have opened a Grant scheme for markets on two occasions, providing funding to cattle markets in Wales to upgrade their facilities allowing TB information to be displayed at point of sale on a voluntary basis. As a result of these rounds of funding, 11 out of 25 eligible markets have upgraded their facilities.

In 2017, the then Cabinet Secretary for Environment and Rural Affairs continued to encourage informed purchasing on a voluntary basis, but announced a longer term goal of developing a mandatory Informed Purchasing regime. The first stage of this process would be to ensure cattle sellers disclose the disease history of the herd at the point of sale, and to include a duty for selling establishments to display the information.

The Welsh Government is also bringing together separate movement reporting and registration systems for cattle, sheep and pigs. EIDCymru will be an effective multispecies traceability system which will assist in limiting the impact of a disease outbreak, improve data and continue to provide consumers with assurance of the provenance of their food.

Proposed areas of change:

A. Adding a new map to ibTB showing the number of years unrestricted cattle herds have been Officially TB Free (OTF).

ibTB (<https://ibtb.co.uk/>) is a free-to-access interactive map showing the locations of all TB breakdowns in cattle herds in Wales and England over the last 10 years. It can be used by cattle keepers and vets to help build an understanding of the scale of the TB threat in a particular area, thereby enabling them to take proportionate steps to protect cattle herds. In some ways, it can also be used to support responsible cattle purchasing decisions.

To better help keepers safely manage the introduction of new cattle into their herds, we are considering the potential of sharing, through ibTB, limited information about the TB history of all cattle herds in Wales. Currently ibTB only shows the location of herds under restrictions due to having a TB breakdown or have had a breakdown in the previous 10 years.

The number of consecutive years a herd has remained officially TB free is an indicator of likelihood of a new breakdown occurring in the herd. The higher the number, the lower the likelihood. We propose to explore the possibility of adding a

new map to ibTB to show the number of years currently unrestricted cattle herds have been officially TB free.

B. Mandate provision and display of TB information at point of sale

Due to the voluntary nature of informed purchasing to date, it has been impossible to guarantee all relevant TB information is displayed and in most cases, disappointingly falls short of the initial vision for the initiative.

To coincide with enhancing the ibTB interactive map to better support responsible cattle movements, another option would be to mandate the provision and display of TB information at the point of sale to ensure farmers provide TB information and market operators clearly display the information on an electronic screen. For private cattle sales, it would be anticipated TB information is provided to the buyer in advance of a sale.

To help farmers make informed decisions about the health of the cattle they wish to buy, the information shared might include:

- If the herd has ever had a TB breakdown, the date the herd achieved OTF status, number of years since the last TB herd breakdown finished, or the total number of TB breakdowns.
- Date of the animal's most recent pre-movement test (if applicable).
- Date of the selling herd's most recent routine surveillance test.
- Cattle Health Certification Standards (CHeCS) accreditation or other relevant accreditation/assurance status (if applicable).

Questions

12. Do you agree with the proposals outlined? Please explain your reasons.

13. In the future, do you believe there should be implications for cattle keepers who fail to take notice of TB information, and make a purchase regardless of highlighted risks? Please explain your reasons. What do you believe these implications should be?

7. Payment for TB affected cattle

Background and reasons for change

In April 2019, Lesley Griffiths, then Minister for Environment, Energy and Rural Affairs announced a review of the current regime for making TB payments (TB compensation) to farmers in Wales would take place. The primary reason for this review was due to the current cost of the existing system being unsustainable in light of the available budget.

A wide range of options for TB payments were reviewed by the TB Eradication Programme Board during 2019 and 2020 as part of the review. The Programme Board recommended 3 out of 9 options be considered further, alongside a consultation. The review was then paused due to the Covid-19 pandemic.

The full list of options and potential savings for each option considered by the Programme Board can be found in Annex 1 to this consultation. Potential savings have been updated in light of the latest financial information available. The reasons why 6 of the 9 options were not brought forward to the consultation include:

- Limited potential cost saving.
- Fails to take account of good farming practice and behaviours.
- Practical implementation difficulties.
- Adverse implications on certain farming businesses/sectors.

The Minister for Rural Affairs and North Wales, and Trefnydd wishes to resume the review of the TB Payment regime and seek views on the 3 options recommended by the Programme Board.

Current position

Animal owners are paid by the Welsh Government for cattle slaughtered because of TB as set out in The Tuberculosis (Wales) Order 2010 (as amended) (*The TB Order*). This legislation requires payment to be calculated based on the market value of each individual animal. To establish the market value of an animal, a contracted valuer must determine, by valuing the animal concerned on farm, the price the animal might reasonably obtain if it was for sale on the open market and was not affected or exposed to TB.

Welsh Government contracts the services of valuers under the TB Valuation Services Framework to carry out on farm valuations. As payments are made for animals which must be slaughtered because of TB, the Welsh Government has no control over how much is paid out in any given financial year.

Incentives and disincentives

The Welsh Government currently applies reductions to TB Payments for keepers who breach the TB Order in the following circumstances:

Illegal movement (without license)	95% reduction
Movement under license (onto a restricted holding)	50% reduction
Delayed removal	25% reduction (1 to 10 days) 50% reduction (10 to 20 days) and so on
No passport	£1 payment
Breaches to the TB Order	Up to 95% reduction

Non-compliance with an isolation order	50% reduction
Veterinary Requirements Notice and Biosecurity Requirements Notice breaches	1 st breach 50% reduction, subsequent breaches 95% reduction

In terms of discouraging breaches, the current process only effectively discourages non-compliance with legislation when animals subject to a breach are slaughtered because of TB, and TB payment is reduced.

In regards to providing incentives for cattle owners to proactively manage a TB breakdown on their farm, there is currently little obvious financial incentive other than to discourage the movement of animals on to the holding under licence, with a subsequent 50% reduction to the TB payment due if the animal concerned is slaughtered because of TB in future.

A more effective way of incentivising positive behaviour would be to make it clear to cattle owners what actions they could take to proactively manage the TB breakdown on their holding (for example implementing high standards of biosecurity). This would realistically have to be directly linked to a financial incentive.

Penalties for breaches to the TB Order will be included in any new TB payment regime, however, the detail will be considered separately to this consultation.

Questions

14. The Welsh Government proposes to link TB payments to implementation of disease prevention and control practices. What are your views on this?

There are a number of key drivers for change:

- There are historic, long term overspends against the TB payments budget. In fact, the Welsh Government has overspent on the final budget for TB payments since the 2015-16 financial year. The TB payments budget is forecast to overspend again for 2021/22 by approximately £7m.
- As the Welsh Government has a statutory duty to pay farmers for animals slaughtered under the Programme, funding to cover these overspends has to be found year on year, diverting much needed funding away from other areas.
- Efforts to improve the sensitivity of testing across the board will likely result in more animals being slaughtered under the TB Eradication Programme, thus requiring payment.

- It has been confirmed by the Department for the Environment, Food and Rural Affairs (DEFRA) that the UK Government has decided not to participate (as a third country) in the EU's Single Market Programme from 2021. This means there will be no opportunity for further EU funding for the UK Bovine TB Eradication Programme after 31 December 2020. The final payment of £1.09m EU funding was received in August 2021, this relates to the 2020 Eradication Programme.

These issues make the current TB payment policy wholly unsustainable and, therefore, an alternative arrangement must be sought.

Options for an alternative approach to TB payments

The Welsh Government's aims for a new TB payment regime are:

1. A system which provides a fair and proportionate TB payments to cattle keepers.
2. A system which realistically reflects the financial resources available to fund TB payments.
3. A system which encourages best practice whilst also providing disincentives for non-compliance.

A. Table Valuations as per current English system

DEFRA uses average market prices to calculate compensation for cattle culled because of TB. Every month DEFRA publishes a table of compensation values for 51 different categories of cattle. The categories are based on an animal's:

- age (group)
- sex
- pedigree status
- type (beef or dairy).

Sales data for around 1.5m cattle are collected each year to make sure the table values adequately reflect market prices (however sales information is not complete for all types of sales). For non-pedigree animals one month of price data is used to calculate compensation. For pedigree animals six months of price data is used.

Opportunities:

- Analysis of information held shows Welsh Government would have saved around £5.1 million in TB payments in 2020-21 if table valuations were used instead of individual valuation.
- This option would be relatively easy to administer.
- This option is easy to understand and also offers transparency.
- This would also reduce the cost of valuer's fees, although this reduction in cost is more difficult to estimate as table valuations still require on farm valuations where not enough market data exists for a given classification of animal.

Challenges:

- This option would affect pedigree cattle owners more than commercial cattle owners. In 2020-21 the reduction in TB Payment would have been due is greater for pedigree cattle (-34%) than commercial cattle (-21%).
- Statistical analysis of TB Payments shows the difference in 2020-21 is slightly greater for dairy cattle (-27%) than beef cattle (-28%).

Potential saving: £5.1M

B. Table valuations with an increase to payment based on membership of an approved animal health accreditation scheme

Under this option TB payments would be increased by 10% of the table valuation amount if the owner could demonstrate they were registered with an approved animal health accreditation body. Being a member of an approved accreditation body would mean meeting a set standard of on farm biosecurity and good farming practice and would be endorsed and checked by that body. APHA would carry out an administrative check to ensure the cattle owner was registered with an accredited body at the point the animals concerned were disclosed as reactors.

Opportunities:

- For disease control practices to be taken in to account – A potential increase in the TB Payment due would also be linked to the owner being accredited.
- Reduction of costs of costs to Government - This would reduce the cost of valuer's fees as on farm valuations would only be required where there was insufficient market data available to allow a table valuation to be calculated.
- Quicker removal of animals - This process would allow the quicker removal of animals as there would be no delay for valuation before removal in the majority of cases.
- Fewer on farm visits - This option would remove the need for the majority of on farm valuations and would therefore contribute to a decrease in the number of inspections cattle owners would be required to facilitate.
- Easy to Administer - This option would be relatively easy to administer from a Welsh Government perspective.

Challenges:

- Welsh cattle prices - It has been claimed table valuations do not take in to account the quality of Welsh cattle. The Agriculture and Horticulture Development Board (AHDB) provides sales data to allow table valuations to be paid. We could explore the possibility of using market data relating to livestock registered to Welsh holdings, or use market data from cattle markets in Wales.
- Value added by an accreditation scheme – If membership to an accreditation scheme was to attract extra TB Payment then the Welsh Government would need to ensure such membership could be shown to add value to the owner's ability to management TB on their holding. Consideration may need to be given to ensure the increase in payment for membership of an accredited body is proportionate to the potential improvement of the disease picture on participating

farms. This would ensure membership of a participating scheme would be financially viable and attractive, whilst also effectively contributing to the eradication of TB.

Potential saving: If 10% of market values was paid in TB payments to the majority of owners then approximately £4.3M per year could be saved, excluding savings made relating to valuers' fees.

C. Payments to be determined by an industry led independent group. An industry Levy would partly fund TB Payment costs.

This option would see TB Payments funded in a similar way to how this is managed in New Zealand. TB Payments would be determined (within clear parameters) by an industry led independent group would take into account eligibility criteria such as compliance with the TB Order and risk based trading when determining how much TB Payment was due to each owner.

This group would be funded partly by Government and partly by a new beef and milk levy. In Wales a levy is jointly paid (per head) by the producer and slaughterer/exporter to Hybu Cig Cymru for cattle slaughtered in Wales or exported, dairy farmers pay a levy to AHDB. This new levy could be potentially collected by AHDB and Hybu Cig Cymru, however details of associated practicalities and potential costs would need to be explored.

Opportunities:

- An industry led group playing a role in determining how much TB payment should be made may encourage the farming industry to adopt a greater sense of ownership of the disease.
- This option would create a more sustainable TB payment system as the cost of a TB payment system would be shared between Welsh Government and industry. Any overspend of existing TB payment budgets could be met jointly between industry and the Welsh Government.
- One of the roles of the industry led independent group would be to determine when TB payments should be reduced because of breaches to the TB Order. Industry involvement with this process could help to re-inforce the requirements of the TB Order, and could take in to account issues such as buying practices and the history of owners complying with TB legislation.

Challenges:

- In New Zealand the Animal Health Board (AHB) was created as an independent legal body with responsibility for controlling bovine TB. Under this option the Welsh Government would continue to retain responsibility for controlling bovine TB, with the independent board having responsibility for overseeing and recommending how much TB payment should be made to owners. This option would therefore not directly give the farming industry increased influence on how the TB Programme should be structured (over and above existing stakeholder engagement). As such expectations of the farming industry would need to be managed.

- Any move towards creating a Levy would need approval from the UK Treasury.
- Although part funding of the TB payment budget would make a more sustainable system, overspends could still occur as it is difficult to predict exactly how many animals will be slaughtered because of TB and the associated cost in any given financial year.
- As a mechanism for collecting a levy is already in place Welsh Government could explore the practicalities, costs and potential levy rates required to partly fund the TB payment system. The practicalities and implications of setting up an industry led independent group, similar to the Limited company OSPRI in New Zealand would need to be explored.

Potential saving: This would be dependent on the proportion of the overall budget industry would contribute through a levy.

Questions

15. Do you agree/ disagree with any of the 3 proposals? Please explain your reasons.
16. Annex 1 to this consultation sets out all proposals considered by the TB Eradication Programme Board. Are there any other proposals you feel should be explored? If so, please provide details.

8. Explore prohibiting feeding of unpasteurised milk to livestock on OTFW premises

Background and reasons for change

There have been cases where a group of young calves have been identified with TB in the lymph nodes associated with their digestive tracts, suggesting ingestion of infection. These cases of TB in young calves are invariably associated with the practice of feeding raw cow's milk excluded from the bulk milk tank for other reasons, such as medication withdrawal periods or high cell count. On occasion, the infected cow is subsequently identified as having undisclosed TB infection in the udder.

Keepers of OTFW breakdown herds are advised not to feed raw cow's milk to calves due to the potential risks. It is proposed to explore the possibility of an amendment to the TB (Wales) Order 2010 (as amended) in order to prohibit the feeding of raw cow's milk to calves in OTFW breakdowns.

Question

17. Do you agree with this proposal? Please explain your reasons.

9. TB and non-bovine species

A. Explore consolidation of the legislative requirements for sheep and pigs into the Tuberculosis (Wales) Order 2011

Background and reasons for change

The Tuberculosis (Wales) Order 2011 confers statutory TB controls for deer, goats and camelids and covers compulsory identification, records, movement restrictions, testing, slaughter and compensation arrangements. Veterinary Improvement Notices (VINs) can be issued by Veterinary Inspectors. The 2011 legislation prohibits treatment, vaccination and testing for *M. bovis* unless written consent is given by APHA.

Relatively few sheep and pig breakdowns occur annually in Wales. However, the Welsh Government still receives information on a low number of suspect cases in sheep and pigs either from abattoir or post mortem examination. Not all of these are confirmed by culture of *M. bovis*. Even though these cases are infrequent, they do occur.

There are already legislative provisions for dealing with cases of bovine TB in sheep and pigs:

- The Tuberculosis (Testing and Powers of Entry) (Wales) Order 2008 grants additional powers to inspectors to enter land - Tests and samples: power of entry
- The Animal Health Act 1981 provides powers in relation to slaughtering of suspect sheep and pigs.
- Compensation arrangements are in place (higher compensation in case of breeding animals), but these rely on the keeper to sign and agree to them.

There are also requirements in the Tuberculosis (Wales) Order 2010 regarding the notification of disease in carcasses and control of infection from other animals.

It is proposed that consolidation of the requirements for sheep and pigs into the TB (Wales) Order 2011 is explored in order to confer the same requirements on sheep and pigs as we do on other non-bovine species.

Question

18. Do you agree with this approach? Please explain your reasons.

B. Identification of non-bovines for TB testing purposes

Background and reasons for change

The Tuberculosis (Wales) Order 2011, Article 5 states:

The keeper of a deer, alpaca, guanaco, llama or vicuna must mark or identify it in a manner approved by the Welsh Ministers.

It is proposed that provision is made to clarify, **for TB testing purposes**, a non-bovine must be identifiable through a microchip, a unique number on an ear tag, or by a marking or identification method approved by an inspector.

When any animal is TB tested, it is vitally important to be able to distinguish this animal apart from any other. There have been a number of occasions where, during a TB test, keepers of non-bovines have refused to mark/identify their animals appropriately, making identification of tested animals difficult. While the Welsh Government does not intend to bring in statutory identification methods for these species generally, it is proposed, for TB testing purposes, these animals should be identifiable and marked appropriately.

Question

19. Do you agree with this approach? Please explain your reasons.

10. Governance

Background and reasons for change

As the Welsh Government is considering a Programme refresh, it is appropriate to include Governance arrangements within the review.

A. TB Eradication Programme Board

When the TB Eradication Programme was established, a Governance structure was put in place with the Programme Board being responsible for providing direction and management of the programme, including monitoring its implementation.

The Board is chaired by the Chief Veterinary Officer for Wales and includes representation from:

- Farming industry;
- Veterinary profession;
- Academia;
- Animal and Plant Health Agency;
- The Welsh Government.

Members were invited to sit on the Board based on knowledge, expertise and experience in their fields.

Questions

20. Do you agree with the role and representation of the TB Eradication Programme Board? Please explain your reasons.

B. Regional Eradication Boards

In 2008 three Regional TB Eradication Boards were established under the '*One Wales- progressive agenda for the government of Wales*' publication. The South West Regional Board, South East Regional Board and North Wales Regional Boards were established to be a key link between the TB Eradication Programme and the farming industry. The aim of the TB Eradication Boards is to monitor and understand the TB picture in their area, input into policy development, develop new ideas, and deliver a co-ordinated and concerted approach to eradicating TB from their region. The Boards are made up of keeper volunteers and other local farming, veterinary and support organisation representatives. Representatives are not paid for attending meetings or events associated with the Board, however, they are able to claim travel and subsistence costs if they are incurred.

It has been 13 years since these Boards were established, and some good work has been done. However, the bovine TB landscape in Wales has changed since 2008, as has the Welsh Government's TB Eradication Programme and membership of the regional boards has remained largely unchanged. It is timely to revisit these arrangements, considering how stakeholders may best be engaged in policy development, dissemination of key messages, and facilitation of improved relationships.

Whilst recognising the work undertaken by the three Regional Boards since 2008, the Welsh Government believes it is the right time for the stakeholder role in the Programme to be revitalised and would like to seek views on the most appropriate approach to involving stakeholders in the Programme Governance structure.

The aim of a revitalised approach is to:

- Reinvigorate stakeholders' appetite to engage constructively in the TB Eradication Programme.
- Help strengthen the link between the Welsh Government and industry and to provide links to the wider farming community, by liaising and gaining information from industry to better inform decisions.
- Contribute constructively to the development of new policies, recognising and respecting Government's priorities and red lines.
- Help facilitate and streamline key messages and two-way flow of information between the Welsh Government and the farming industry; and establish links to the wider agricultural and rural community.

- Raise and consider issues which could impact on achieving the key outcomes of the TB eradication programme.
- Review progress of outcomes.
- Provide opportunity for new stakeholders to be engaged in the development and delivery of the TB Eradication Programme.

The Welsh Government believes a publicly appointed TB stakeholder group, similar to the already established [Animal Health and Welfare Framework Group](#), could meet the Programme's aims and objectives in terms of stakeholder involvement. The Welsh Government would undertake a public appointments exercise and invite applications from interested stakeholders, appoint a chair, and members representing a wide range of sectors and interests. Adverts for board members would be made through a range of platforms, and applicants would be expected to apply by demonstrating their skills and experience relevant to the role as board members. A clear Terms of Reference for the group would establish the working relationship between the Welsh Government and the members, and outline key priorities for the group.

There are, however, many options for engaging with stakeholders as part of our Programme. Some of these options include:

1. Maintain the Regional Board geographical structure, but re-start the process of appointment to the Boards and setting of an appropriate clear Terms of Reference. Membership would be on a voluntary basis.
2. Create a single publicly appointed TB stakeholder group covering all Wales.
3. Create two publicly appointed TB stakeholder groups, one covering North Wales the other covering South Wales.
4. Discontinue the Regional Boards, and continue with the Programme Board only. Liaise with individual representative organisations for stakeholder involvement in the Programme.

Questions

21. Do you agree with any options outlined above? If yes, please state which. If not, please provide the reasons why.

22. Do you believe there is an alternative approach? If so, please explain further.

C. Establish a Technical Advisory Group

It is proposed a new Technical Advisory Group is brought into the Governance arrangements of the Programme. This Group would report to the Programme Board and consider technical issues for example cattle vaccination and TB diagnostics. Membership of such a group would include experts in their fields from academia and industry.

Question

23. Do you agree with this proposal? If so, please suggest scientific disciplines which could add value to the Programme? Please explain your reasons.

11. Other questions

Question 24: We would like to know your views on the effects these proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Question 25: Please also explain how you believe the proposed policy approach could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Question 26: We have asked a number of specific questions throughout this document. If you have any related issues which we have not specifically addressed, please specify.

12. Next steps

You are invited to submit your views on these proposals. Responses should be sent by email by midnight on 8 February 2022 at the latest. Responses to the consultation will be analysed and a summary will be produced and published.

Your details

Your name	
Your organisation (if applicable)	
Your address	
Responses to the consultation will be made public in a report on our	

website. Would prefer your response to remain anonymous (Y/N)?	
<p>Which one of the following best describes you?</p> <ul style="list-style-type: none"> • Farmer/keeper • Farming industry representative or organisation • Livestock auctioneer • Member of the public • Vet • Wildlife organisation • Other 	

Annex 1

Option	Title	Potential Saving
1	No change to system	£0
2	Owner to receive the salvage value direct from the slaughterhouse	£19.0M
3	Table Valuations as per current English system	£5.1M
4	Table valuations with uplift based on paperwork and sight of animals at the slaughterhouse ¹	£4.3M
5	50% of market value due. An increase up to 70% due to certain requirements met by the owner	£7.6M
6	Market value due. £1 due for animals brought on to a holding under licence.	£4M
7	Industry led independent group to decide compensation due. Industry Levy to partly fund TB compensation costs.	TBD
8	50% of market value due for animals removed from persistent breakdowns	£3.4M
9	50% of market value due. Owners to take out Insurance to cover the remaining value of animals.	£8.0M

¹ This option was refined by the TB Eradication Programme Board to 'Table valuations with an increase to payment based on membership of an approved accredited scheme'.

Annex 2 – Glossary

APHA - The Animal and Plant Health Agency.

AWBFD - All Wales Badger Found Dead Survey.

Bovine tuberculosis (TB) - infection with and disease caused by the *M.bovis* organism. Bovine TB is infectious to humans and many other animal species. Pasteurisation of milk and meat inspection provide high levels of protection to humans. Badgers and deer are the main wildlife hosts considered as important in the transmission of disease to cattle. Camelids, deer, goats, sheep and pigs can all be infected, but sheep and pigs are considered less important in transmitting infection to cattle in the UK. The main host is cattle. Very few cattle are seen with clinical signs of TB, such as coughing or emaciation, due to the intensive testing programme in the UK. The disease can remain undetected for long time periods and then trigger into an infectious state, or spread further in the body.

Contiguous testing - Additional testing which takes place in herds neighbouring OTFW breakdowns where an epidemiological assessment indicates they are likely to be at risk of exposure to infection.

Chronic herd breakdown - A 'chronic' herd is defined as either a herd which is OTFW and:

- Has been OTFW for a duration of 18 months or longer, OR
- Became OTFW at or before the 12M check test, following an earlier OTFW breakdown, BUT excluding those recurrent breakdowns where all reactors are animals bought in since the close of the previous incident, unless subsequent molecular typing information does not support a purchased origin.

Cymorth TB - Veterinary support for TB affected cattle keepers.

Delivery Plan - The TB Eradication Delivery Plan sits under the TB Eradication Programme document. It sets out detailed measures to be implemented. The latest Delivery Plan can be found [here](#). It is the intention to publish a refreshed Delivery Plan in the summer of 2022.

Endemic - a disease which is constantly present to a greater or lesser extent in a population.

Genotype - The genetic constitution of an individual (in this case the genetic constitution of the *Mycobacterium bovis* bacterium).

IDEXX test - A laboratory based blood test for the diagnosis of bovine TB. The test detects antibodies produced by the animal's immune system to identify and neutralise *M.bovis* organisms.

Interferon gamma test - A laboratory-based blood test, for the diagnosis of bovine tuberculosis. The test identifies a cell-mediated response from the animal's immune

system to *M.bovis* infection. The interferon gamma test can identify infected animals earlier in the infection process than the skin test and also some infected animals which are missed by the skin test.

IR - Inconclusive Reactor - An IR is an animal which has given readings to the tuberculin skin test between the clear (pass) and reactor (fail) ranges.

Keep it Out visits - Veterinary support for keepers in the ITBAN and LTBA Hotspots whose herds test clear to a contiguous test.

Mycobacterium bovis* or *M.bovis – the organism responsible for bovine TB

OTF - Officially TB Free

Officially TB Free Withdrawn (OTFW) - The TB free status of a herd is withdrawn when:

- More than one reactor is found at a surveillance test or only one reactor is found but additional evidence suggests infection is present. Or
- When TB is identified at post mortem examination of an animal sent from a herd to a slaughterhouse.

OTFW herds need to have two clear consecutive TB tests for movement restrictions to be lifted.

Persistent herd breakdown - A persistent breakdown herd is defined as a herd which has been OTFW for a duration of 18 months or longer.

PoMT / PrMT - Post-Movement TB Testing / Pre-Movement TB Testing.

Programme Board - Established in 2008, the TB Eradication Programme Board is responsible for providing direction and management of the programme, including monitoring its implementation.

Regional Boards - Also established in 2008 there are three Regional Eradication Delivery Boards covering North Wales, South East Wales and South West Wales. The aim of the TB Eradication Boards is to monitor and understand the TB picture in their area, input into policy development, develop new ideas, and deliver a co-ordinated and concerted approach to eradicating TB from their region.

Sensitivity - the likelihood a test will identify an infected animal as positive to the test.

Severe interpretation - where a more strict interpretation of the skin test results has taken place in order to increase test sensitivity in herds where indications are that infection is present.

SICCT or skin test - the main test used in the UK for TB surveillance and control (breakdown) testing. It identifies a cell-mediated immune response to *M.bovis* infection. The test consists of injecting avian and bovine tuberculin in different sites

on the neck and comparing the size of the response. The test has been around for decades, but still remains a very good herd surveillance test, due to its high specificity.

Spatial unit - The TB Areas are an amalgamation of 58 spatial units. A spatial unit is made up of parishes, created using a similar approach to establishing statistical units for the UK censuses. The spatial units are compatible with the CPH system and each contains a similar number of herds.

Specificity - the likelihood a test will detect an uninfected animal as negative to the test.

Standard interpretation - where the normal interpretation of the skin test results has taken place due to no extenuating circumstances.

TB Eradication Programme - first established in 2008, latest document setting out overarching approach can be found [here](#).

TB restriction - Movement restrictions imposed on cattle and/or a holding as a result of finding evidence or on suspicion of TB.