BVA and BVA Welsh Branch Response to the Welsh Government Consultation on the Compulsory Bovine Viral Diarrhoea Eradication Scheme

Who we are
The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom’s veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues, and employment matters.

BVA Welsh Branch represents members in Wales, bringing together representatives of specialist and territorial divisions, government, academic institutions, and research organisations in Wales. The branch advises BVA on the consensus view of members in Wales on Welsh and UK issues.

Consultation Response

Bovine Viral Diarrhoea (BVD) Eradication

1. Do you agree that BVD presents a problem for the farming industry in Wales?
   Yes, BVD is a highly contagious viral disease of cattle and one of the biggest disease issues facing the UK cattle industry. The BVD virus produces immunosuppression and reproductive failure, making it difficult for cattle to become pregnant and making cases of pneumonia, diarrhoea and other diseases much worse, leading to both significant welfare and financial problems for an infected farm. Gwaredu BVD found that just over a quarter of herds tested received a positive result. This is a significant proportion of herds, and if no action is taken this proportion could increase exponentially due to the ease with which the disease is spread. Disease control and preventative healthcare is an essential part of the agricultural and food sector, where vets and farmers work collaboratively with others to protect animals, people and the environment they share.

2. Do you agree that BVD eradication will improve the health and welfare of Welsh cattle?
   Yes. Preventing the spread of an infectious disease clearly improves the health and welfare of animals. The effect of the BVD virus outlined above has a clear impact on animal welfare. Eradicating BVD will also reduce numbers of calves born as persistently infected (PI) animals, which suffer long term health impacts. It will also reduce the need for isolation, which can impact on welfare – even with mitigations in place such as those proposed for this scheme. In countries where BVD control and eradication has been established, an improvement has been seen in cattle health and fertility. Proactive monitoring and eradication of BVD also has potential benefits for preventive healthcare and treatment for livestock, health monitoring and disease surveillance, promoting good biosecurity, promoting high animal health and welfare, and optimising food productivity and sustainability.
3. Do you agree that the eradication of BVD will benefit Welsh cattle keepers?
   Yes. Although BVD does not prevent the animals entering the human food chain, it
does have an impact on productivity and growth, which ultimately affects income.
Control measures may mean that animals cannot be slaughtered at the optimum time.
or moved on in line with the overall plan for the herd. Eradicating BVD means, in the
long term, far less need for these measures, and far fewer instances of unhealthy
stock. Ultimately, anyone working with livestock wants their animals to be as healthy
and happy as possible. There would also be a positive impact on the reputation of the
Welsh cattle industry.

4. Do you agree with the introduction of legislation to support the eradication of
   BVD from Wales?
   Yes. Although uptake of the voluntary scheme has been positive, BVD is highly
contagious, so any non-participants could have a disproportionate effect on
neighbouring herds.

BVD Screening
5. Do you agree that legislation imposing requirements for mandatory regular BVD
   screening is necessary to eradicate the disease?
   Yes. Identification of asymptomatic PIs is essential to reducing the prevalence of BVD,
and regular testing will also reduce the numbers of calves that are born PI. It will also
provide reassurance to farmers introducing new stock to the herd, and allow them to
take action to reduce the spread within the herd. However, testing requirements must
be proportionate and affordable.

6. Do you agree that cattle from a herd with positive BVD status, that test positive,
   should have their movement restricted, unless that movement is to slaughter?
   Yes, to limit the spread of disease within that and neighbouring herds. Allowing
movement to slaughter limits the impact on the cattle keeper, and supports the
removal of infected cattle from the herd. However, decisions will need to be made
case-by-case on whether the appropriate action is swift removal to slaughter to
prevent further infection in the herd, or whether strict isolation is possible so that the
animal can be retested to demonstrate transient or persistent infection, and
vaccinated.

7. Do you agree that cattle from a herd with positive BVD status, that test negative
   for BVD via antigen test, should not be permitted to leave the holding where
   they are based unless they obtain a pre-movement negative antigen test within
   21 days of the move?
   Yes in principle. This is a sensible precaution to limit the spread of BVD to uninfected
herds, whilst minimising the impact on keepers by allowing them to continue with
normal herd management of uninfected animals. This also benefits welfare, by
preventing the build up of cattle which cannot be moved on, leading to overstocking of
the holding.

   However, we are concerned that 21 days is a long period to manage potential
infection risk. Negative antigen testing and vaccination may prove more practical and
lower risk to uninfected animals on the holding.
8. Cattle keepers may be required to pay for their herd screenings, PI hunts and pre-movement testing to move cattle from a BVD positive herd. Do you agree that, in principle, this is a fair expectation?

This is fair in principle, provided it is proportionate and affordable. Annual testing may not include young stock, who will need to be screened. To reduce the impact efforts should be made to co-ordinate BVD and TB testing where possible. We would welcome the availability of support to ensure keepers are not prevented from compliance for purely financial reasons.

PI management and isolation
9. Do you agree that legislation imposing requirements for mandatory PI isolations is necessary to eradicate the disease?

Yes. PIs are responsible for infecting others in the herd and also from field-to-field to unsuspecting neighbouring farms. The instant removal of PIs is a key factor in successful BVD control schemes.

BVD Data Management
10. Do you agree that farms should have the BVD status of their herds and individual animals (where the herd status is BVD positive) made securely available to other keepers via the Multi Species Wales online portal at the time of purchasing cattle?

Assuming usual data protection measures are in place, we support this as a reasonable measure to allow farmers to manage the risk of unwittingly introducing BVD into their herd. It would also reduce the financial impact on affected farmers, and welfare impact on infected animals, where they are still allowed to move on uninfected stock.

Enforcement
11. Do you agree that keepers who breach the requirements of the proposed compulsory scheme should be liable to penalties?

Yes. Some penalty is likely to be necessary to ensure wide compliance with the scheme. This protects the investment made by farmers and the wider cattle industry to eradicate the disease.

12. Are you involved with cattle keeping?

We represent the veterinary profession, which will be well-placed to advise and influence those implementing the proposed scheme, and play an essential role in safeguarding animal health and welfare. The veterinary profession is an integral part of the agricultural and food sector, working collaboratively with others to protect animals, people and the environment they share. Veterinary surgeons provide preventive healthcare and treatment for livestock, as well as carry out health monitoring and disease surveillance, promote good biosecurity, promote high animal health and welfare, undertake research and development, and optimise food productivity and sustainability.

13. We would like to know your views on the effects that a BVD eradication scheme for Wales 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?
BVA is aware of the Welsh language act and the importance of the Welsh language in Welsh communities, particularly in rural areas likely to be most affected by this scheme. Our high animal health and animal welfare standards rely on effective communication between farmers, their own vets and government vets, for example to enable effective disease surveillance to be carried out. Welsh language is an essential aspect of this communication and it is important for animal health and welfare that farmers in all parts of Wales are able to access schemes and veterinary services in their chosen first language.

14. Please also explain how you believe the proposed policy 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.

BVA are not well placed to comment on this issue.

15. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.