January 2019

Dear Sir/Madam

**BOVINE TB: PROPOSAL FOR A NEW TYPE OF TB UNIT - BIOSECURE REARING UNIT (BRU)**

1. We are writing to invite you to comment on Defra’s proposal to support owners of TB restricted herds by supporting the establishment of a secure outlet for their surplus calves through licensing a new type of approved TB unit - a Biosecure Rearing Unit.

Any responses to this proposal should be submitted to bTBengage@defra.gov.uk no later than 22nd February 2019.

You can also post your response to:

Defra TB Programme
Area 2D Nobel House
17 Smith Square
London SW1P 3JR

**Background**

2. Approved Finishing Units (AFUs), licensed to operate by APHA, provide an outlet for the fattening and/or finishing of clear tested cattle from TB restricted holdings, which lack such facilities.

3. There are two types of AFUs: those which include double fenced grazing land (AFUs with grazing) and those where cattle are housed in wildlife-proofed accommodation (non-grazing AFUs).

4. AFUs with grazing can only be licensed in parts of England’s High Risk Area (HRA) where infected wildlife is a significant cause of TB breakdowns in cattle herds. This is because in such areas there is a low risk of AFUs with grazing exacerbating the disease problem in badgers. Where badger culling has been carried out, the number of TB incidents caused by wildlife is expected to drop, therefore in cull areas, licences for AFUs with grazing are revoked after two seasons of badger culling to remove the risk of
undermining the expected benefits of culling. As a consequence the number of AFUs with grazing has dropped in recent years, that trend is expected to continue as the number of badger culling areas increases.

5. Many owners of TB restricted herds keep their stock to finish for slaughter, or sell them once the herd has regained officially TB free (OTF) status. Only a very small proportion of the cattle moved off holdings in the HRA move to AFUs and most of those are moved to housed AFUs.

6. We do recognise, however, that for some TB affected businesses, finding a local outlet for their surplus calves can be a significant problem. Similarly, we know that some UK retailers require ‘their’ cattle to be grazed for a period of time. Added to this we know that it can be economically unviable to keep calves housed until fattened. For these reasons we are proposing to introduce a new type of approved TB unit called a Biosecure Rearing Unit (BRU). These would be similar to AFUs with grazing though would have tighter bio-security controls, and BRU operators would only be able to source calves under a certain age.

**Our proposal**

7. The BRU model we propose would provide a secure outlet for the rearing, fattening and/or finishing of clear tested calves from single or multiple TB restricted holdings from any area of England, Scotland and Wales. Units would only be approved in the High Risk Area of England.

8. BRUs would operate on a ‘batch system’, whereby calves are moved into the unit (and processed) in defined batches and finished right through to slaughter while under the same ownership.

9. BRU operators would have to comply with existing AFU with grazing [terms and conditions](#) plus enhanced biosecurity controls. The key additional controls are:

   - BRUs would only be able to source calves under 42 days old. Sourcing of older animals would not be permitted. This is because the likelihood of *M. bovis* infection in calves is lower than in adult cattle and so limiting the model to young calves reduces the risk of undetected TB-infected animals moving from TB-restricted herds into BRUs.

   - On arrival at the BRU, calves would first be held in a housed rearing unit and would have to complete two tuberculin skin tests read under severe interpretation (at 60 day intervals) with negative results before being permitted to graze.

   - BRUs would be approved for cattle only. No other species of livestock would be permitted in the unit, including the grazing areas.
- In addition to satisfying the BRU terms and conditions, the BRU operator would have to participate in a TB Advisory Service visit and implement all biosecurity recommendations made in the visit report before the BRU could be approved and licensed by APHA.

- BFU operators would be required to have a written contingency plan and biosecurity protocols in place, both of which would need to be signed off by the operator’s private vet and approved by APHA. Any breaches of operating rules would result in sanctions being applied, including the revocation of licences.

- All housing would need to be wildlife proof, and at pasture supplementary feeding of concentrates would be prohibited

10. Whilst BRUs would only usually be approved on a premises that is OTF at the time of approval, exceptions would be made for operators of AFUs with grazing that wish to convert their unit into a BRU.

**Next steps**

11. Subject to the outcome of this consultation, we would hope to deliver this change by summer 2019 (exact date to be agreed).

12. In accordance with existing protocols we will continue to revoke AFU with grazing operating approvals in badger control areas 24 months after culling has started.

We look forward to your response.

**Defra TB Programme**