Consultation on the Department’s Response to the TB Strategic Partnership Group’s Recommendations to Eradicate Bovine Tuberculosis (bTB) in Northern Ireland

Who we are
The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 17,000 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.

The BVA's Northern Ireland Branch brings together representatives of local veterinary associations, BVA's specialist divisions, government, and research organisations in Northern Ireland. The Branch advises BVA on the consensus view of the Northern Ireland members on local and United Kingdom issues.

Our response has been formulated with the British Cattle Veterinary Association (BCVA), and the British Veterinary Zoological Society (BVZS) who support this response, and with input from our Policy Committee.

The British Cattle Veterinary Association (BCVA) is a specialist cattle division of the BVA comprising 1,250 members, of whom approximately 950 are practising veterinary surgeons working with cattle in farm animal veterinary practice.

The British Veterinary Zoological Society (BVZS) is the specialist division of the BVA recognised as having responsibility for exotic pets, companion avian species, zoo animals and wildlife.

Introduction
We are grateful for the opportunity to submit a response to this consultation on the Department’s Response to the TB Strategic Partnership Group’s Recommendations to Eradicate Bovine Tuberculosis (bTB) in Northern Ireland. The eradication of bTB presents a significant challenge due to the complexity of the disease and the large number of factors involved in its spread. The control and eradication of bTB from cattle
and other susceptible farmed species is the only way to minimise the impact on animal health and welfare and on the farming industry, and so reduce cost.

Measures taken to achieve eradication must be based on the application of both sound scientific research and veterinary epidemiology. Intervention measures in farmed species must be accompanied by simultaneous and coordinated measures in badgers and other wildlife for the success of the eradication programme.

A New Approach to Management, Oversight and Partnership Working

G1 Do you agree with the proposal for new partnership structures to oversee the bTB Programme and to help both stakeholders and Government work together to eradicate the disease?
G2 Do you agree with the three tiered approach at a national, regional and local level?
G3 Do you agree with the membership of each tier as proposed?

We fully support the development of a local partnership approach involving farmers, vets, DAERA officers and other appropriate stakeholders (food processors, conservationists, scientists) as a strategy to develop constructive engagement and ensure that bTB eradication strategy is unified and appropriate to the local area.

We welcome the structures that have been proposed to manage and oversee partnership working. Veterinary expertise and input at every level is a necessity, we therefore strongly support this inclusion. Veterinary Officers and private veterinary practitioners (PVPs) bring clinical expertise as well as a wealth of local knowledge to the process of eradicating bovine Tuberculosis, working in partnership with farmers to provide biosecurity advice, surveillance expertise and farm health planning.

We support appropriate payment for members of the proposed TB Eradication Partnership (TBEP) to do otherwise may limit those who are able to take part. We note that Regional Eradication Partnerships (REPs) members will not receive payment for their role as it is at an operational and sub-regional level rather than at a strategic and regional level. We are concerned this will deter candidates from applying for these roles which will carry significant commitment and responsibility. As the role of Disease Response Teams (DRTs) will be ad hoc, it will be appropriate in this case that members should not receive payment.

Tools and Processes

T1 Do you agree that there should be a mandatory requirement for herd-keepers to have their animals undergo gamma interferon testing where DAERA considers it necessary and that all animals which test positive to the gamma interferon test should be removed?

We support the use of interferon gamma testing in a structured manner to enable more thorough identification and removal of infected animals from breakdown herds. Effective communication with keepers regarding this form of testing will be key, given
the potential for the application of a retrospective severe interpretation. Poor communication around testing regimes can lead to frustration from all stakeholders, at farm and government/veterinary levels.

It is essential that test interpretations are as consistent as possible across Northern Ireland and consideration must be given to how this will be facilitated (suggestions include the provision of case studies detailing the more complex situations; DAERA to work with software companies to ensure that correct and consistent interpretations are generated every time).

Any inconsistencies in interpretation make it extremely difficult for the tester to inform the keeper at the end of the test which animals are to be taken and which retained on farm. This could lead to some animals not being tagged and isolated as reactors, creating stress for all concerned. Serious consideration must be given to how this will be addressed.

The removal of animals which test positive is sensible. Where a test proves inconclusive, restricting the animal to the holding would be proportionate to the risk of subsequent disease disclosure. Again, effective communication with the farmer is extremely important.

**T2 Do you agree that ‘chronic herds’ should be recognised as a distinct entity for action and that there should be a renewed approach to dealing with chronic herds as outlined based on the likelihood that intervention will have a positive impact?**

We understand that interventions and available resources should be targeted where the impact is most likely to result in positive outcomes. We are therefore heartened to see the focus on risk-based assessment and the targeting of chronically infected herds. We support the development of individual action plans by Veterinary Officers applying their professional judgement in specific circumstances. This should be done in partnership with farmers and private veterinary practitioners (PVPs) with local knowledge.

Consideration should be given to establishing an agreed definition of chronic herd, to provide certainty for farmers and veterinary surgeons. For example, the Welsh Government definition of a chronic herd breakdown is a cattle herd that has had its Officially TB Free Status Withdrawn (OTFW) and:

- Has been OTFW for a duration of 18 months or more (i.e. a persistent breakdown); OR
- Became OTFW at or before the 12-month check test, following an earlier OTFW breakdown (i.e. a recurrent breakdown), but excluding recurrent breakdowns where all reactors are animals brought in since the close of the previous incident, unless subsequent molecular typing information does not support a purchased origin.
T3 Do you agree that the Department should introduce measures to prevent restocking of breakdown herds through a phased approach?

T4 Do you agree that the Department should introduce an interim transition stage where no movements will be permitted following a bTB breakdown until at least one further full herd test has been completed (whether clear or not) and reactors have been removed?

T5 Do you agree that, in the medium-term, the Department should prevent restocking of herds that do not test clear at the first retest (subject to epidemiological assessment)?

T6 Do you agree that, in the long-term, the Department should require a negative full herd test before allowing movement onto a farm following any disclosure episode?

We accept that restocking herds which have lost their OTF status has been identified as a risk to disease control. However, this risk has not yet been quantified and any policy on restocking should take this into account. Any policy should also consider the impact of restricting restocking on the viability of many farms, particularly dairy farms.

BVA and BCVA have supported the procedure used in England, Scotland and Wales. Here, the farmer may apply for a licence enabling the movement of cattle from unrestricted premises on to restricted premises. It is necessary to complete at least one short interval test (SIT) before any consideration to issue a licence to allow restocking can take place. A general licence will only be issued in low risk situations. It will allow multiple movements and will last the duration of a breakdown, unless the TB disease risk increases significantly or testing becomes overdue by more than one month. The general licence can only be issued after a satisfactory risk assessment by APHA and may be subject to additional conditions. A specific licence may be issued when a general licence is inappropriate. It will specify which animals can move, only allows a single movement and is valid for a defined period.

We would ask for clarification behind the rationale of a phased approach, and would seek detail on when the Department considers to be the short, medium and long term. It is possible that introducing changes in three separate stages will further complicate the process and introduce confusion for farmers, veterinary surgeons and other stakeholders.

T7 Do you agree that moves should be permitted from bTB breakdown herds to approved rearing/finishing herds which are 100% housed and which meet defined, strict biosecurity conditions?

Finishing Units can provide a critical function for many farms who cannot cope with increased stock numbers whilst under restriction, which can have serious welfare implications. We would support indoor units which meet strict biosecurity to reduce risk of transmission via personnel, equipment, to and from wildlife.

T8 Do you agree that legislation should be introduced to authorise PVPs to apply DNA tags to reactors when reading the test?

We support the introduction of the DNA tagging of positive reactors by the PVP reading the test results at TT2, to reduce the risk of inadvertent or deliberate substitution as
part of the comprehensive bTB strategy. We agree with this proposal to change legislation to enable existing bTB testing contracts which already includes provision for PVPs to apply DNA tags.

T9 Do you agree that, in the event that the pilot scheme demonstrates that there is value in doing so, the Department should undertake reactor quality assurance checks as appropriate?
We await the findings of the pilot scheme that is currently underway before providing comment. When an evidence base is available, this should be shared with stakeholders and due consultation should be undertaken by the Department.

T10 Do you agree that the Department should expand the use of molecular techniques in order to support its strategy to eradicate bTB?
We support the expanded use of molecular techniques. We believe this will provide useful information on the epidemiology of the disease which will provide useful evidence on which to make decisions in future.

Wildlife

W1 Do you agree with the Department’s proposals for wildlife intervention - that is, culling in a central zone, and complementary actions to mitigate perturbation or reinfection as appropriate?
W2 Do you agree with the TBSPG’s and the Department’s assessment that stand-alone vaccination is better utilised as part of a longer-term badger intervention strategy?
W3 Do you agree that vaccination is better utilised in combination with badger removal to first reduce infection in badgers in the short-term?
We note that this section of the consultation is seeking views on a badger intervention policy at a strategic level and as such the level of detail available is limited. We note the intention to undertake a subsequent and more detailed consultation once proposals have been developed by the Department, including views on any proposed legislation changes related to badger intervention. We would welcome the opportunity to engage further at that point and help shape the detail of badger intervention policy in Northern Ireland.

To reduce the reservoir of bTB infected badgers and thus prevent exchange of bTB between cattle and badger, we support badger culling as part of a wider bTB eradication strategy. This support is predicated on a cull being delivered humanely, effectively and safely, in carefully selected areas where badgers are regarded as a significant contributor to the high incidence of bTB in cattle.

We note there is currently no detail as to how any badger cull areas will be delineated and assessed, how population estimates will be achieved or monitored, or whether the proposals would attempt to follow the RBCT methodology. A methodology no less robust than that based on the evidence from the RBCT would be required in order for us to give our support.
We understand that TB incidence and prevalence are not uniformly distributed throughout Northern Ireland and that DAERA holds an extensive dataset showing a detailed picture of disease in cattle and badgers across the province. For this reason, we support and welcome an area-based approach to eliminating TB within the badger population.

Vaccination could be carried out alongside a targeted cull in carefully selected areas. We have supported the Badger Edge Vaccination Scheme in England, which acts as ‘firebreak’ to mitigate the spread of the disease from high to low risk areas. We have welcomed the test, vaccinate or remove (TVR) method as a means to provide data which can inform bTB policy. However, we remain concerned about the lack of sensitivity of the trapside diagnostic tests currently available for evaluating the status of the badger, the risk of perturbation of the badger population and the need to manage stakeholder expectations. We await the completed findings of the TVR study before drawing conclusions on the effectiveness of this process.

W4 Do you agree that the role that other species might play in the spread of bTB to cattle should be kept under review and that further research should be carried out if resources allow?

W5 Do you agree that there is merit in continuing, expanding and enhancing the badger RTA Survey?
We agree that it is important to continue to invest in research into wildlife, be that badgers, deer or any other species, where appropriate. We discuss research further below in response to questions R1 and R2.

There will be continued merit in the RTA survey as an essential data source to evidence future badger control measures.

Preventing Disease - Herd Health Management

H1 Do you agree that Statutory Improvement Notices should be used where it is shown that good herd health management is not being applied and is creating a risk to other neighbouring herds despite advice being provided?
BVA support the use of improvement notices and we understand the Welsh Government has already adopted the principle of reducing compensation should farmers continue with unacceptable high-risk practices or if they fail to adopt recommendations within ‘improvement notices’. Where these have been used, farmers have complied such that there has been no reduced compensation because of non-compliance.

H2 Do you agree that herd-keepers should be proactively encouraged to improve herd health management and take responsibility for herd health management on individual holdings?
Improving on-farm biosecurity is essential to the bTB eradication strategy. Therefore, we agree with this proposal. To facilitate this aim it is important that provision and implementation of advice is based on the available evidence. We note that AFBI are
working on a DARD-funded study investigating herd-owner understanding of and attitudes toward biosecurity principles. We would support further research in this area and recommend the results are incorporated into enhanced guidance for farmers.

PVPs play an essential role in enabling herd-keepers in herd health management. We urge that PVPs are provided with the latest advice and training in relation to biosecurity because they will be in the best position to advise farmers.

H3 Do you agree that the farming industry should lead in the adoption of an ‘informed purchasing’ approach for farmers bringing in stock to their farms? We support the principle of informed purchasing and we welcome sharing information, where there are necessary safeguards in place in relation to personal information about the farm or farmer. The Cattle Health Certification Standards (CHeCS) scheme can provide a useful model of industry led action in this area.

H4 Do you agree that segregation notices should be introduced to protect those herds that are at risk of disease spread from high-risk groups within bTB breakdown herds? We agree with this proposal. The risk of disease transmission exists as much within fragmented herds as it does between herds with separate owners. We welcome the Department’s offer to work with the farming industry to ‘develop and introduce’ the proposal. We would ask that PVPs are also included within this engagement.

H5 Do you agree with the Department’s assessment that, given the high levels of bTB within Northern Ireland, it is not currently feasible to introduce herd classification and purchasing based on herd bTB history? We support the principle of industry led risk-based trading system. This should be a long-term goal, subject to appropriate consultation with stakeholders and industry. This is an area in which the CHeCS TB programme could play a role or provide useful lessons for Northern Ireland.

H6 Do you agree with the Department’s assessment that industry, with support, should proactively encourage farmers to select bTB resistance in the selection of breeding material? We agree this is a sensible approach to reducing bTB prevalence in future.

H7 Do you agree that industry should have a lead role to play ensuring that the legislative requirement, to clean and disinfect vehicles each time they are used to transport animals, is met? We agree this is a sensible approach.
Finance and Funding

F1 Do you agree to the principle that there should be a reduction in the compensation rate from the current level of 100% of an animal’s market value?

F2 Do you agree that the compensation rate paid should be set at 90% of market value in year one, reducing to 75% of market value in year two, subject to the compensation cap also being applied?

F3 Do you agree to the principle that there should be a cap on the level of compensation paid per animal?

F4 Do you agree that, if a compensation cap is introduced, it should be set at £1,500 for a non-pedigree animal, £1,800 for a pedigree animal, and £3,500 for the removal of one pedigree stock bull per herd-keeper each year?

If an animal or group of animals is compulsorily slaughtered for the purposes of statutory disease control, compensation should be paid. Compensation provides reimbursement for losses suffered by the animal keeper and as such compensation should be equitable and reflect the market value of the animal slaughtered. If the compensation paid is below market value the risk of keepers concealing animals suspected of infection will be heightened and the incentive to co-operate with authorities will be reduced, contributing to further disease spread.

We support the principle of a reduction in compensation where there is lack of compliance on the part of the keeper with statutory disease control or accepted best biosecurity practice. We note that unlike recent changes to compensation in Scotland, Wales and England there has been no movement to link reductions in compensation with poor biosecurity or failure to meet legal requirements.

The proposed cap in compensation is significantly less than the £5,000 cap proposed elsewhere in the United Kingdom. When the Scottish Government issued a recent consultation document, it noted there should be equity in compensation with England and Wales to ensure Scotland was ‘not seen by some as a more favourable option in terms of moving high risk cattle to Scotland or indirectly to other low risk areas in England.’ We would therefore have concerns that there may be unintended incentives to move infected animals to higher compensation jurisdictions as a result.

F5 Do you agree with the Department’s approach to keep the introduction of a specific levy for the bTB programme under review but not to introduce one at this time?

F6 Do you agree that each herd-keeper should pay for one herd test per year?

Farmers must meet their responsibility to take measures to prevent the spread of infection and be prepared to share some of the industry costs with respect to bTB control and eradication. The introduction of pre-movement testing in England has been borne largely by the farming industry. We support the decision regarding payment for one annual herd test, which should increase the sense of ownership of the bTB strategy. We agree that a levy should continue to be considered.
Research

R1 Do you agree that the TBEP should be recognised as a significant stakeholder in the research agenda and should be able to input into the identification of gaps and the research commissioning process?

R2 Do you agree that a representative(s) from the TBEP should sit on the steering group which will oversee the proposed new programme of bTB research?

BVA would urge DAERA to continue to support bTB research and ensure it is adaptable to changing circumstances. Research into the best use of current diagnostics, development of new diagnostics, and further development and deployment of vaccines for the control of bTB in both cattle and badgers is of the utmost importance. We also support investigations into alternative sett-based humane culling methods where badgers have been shown to be significantly infected, non-lethal methods of population control (contraceptives), sett-side diagnostics and research into selection of cattle for genetic resistance to bTB.

We support a continued role for the TBEP, providing direction and scrutiny for government and other stakeholders.

February 2018