September 2017

Bovine TB: BVA and BCVA response to Defra consultation on proposals to simplify surveillance testing in the High Risk Area of England and other disease control measures

BVA is the national representative body for the veterinary profession in the United Kingdom and has over 16,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and 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 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.

We are grateful for the opportunity to respond to this consultation. We understand that the proposals are intended to strike a balance between robust disease control and supporting a sustainable livestock industry, in line with the principles of the Strategy for achieving Officially Bovine Tuberculosis Free status for England. Having previously stated that the control and eradication of bTB must be based on the application of sound scientific research and the application of sound veterinary epidemiology, with comprehensive cost effective control and eradication of bTB from cattle and wildlife populations the aim, we broadly support the principle of rationalising the testing regime and other measures outlined in the paper.

Streamlining and simplifying TB testing in the High Risk Area based on default six-monthly routine herd testing with less frequent testing for lower risk herds

Q1. Do you agree that the default surveillance testing interval should be six months in the High Risk Area?

We believe this would be a sensible measure. The introduction of default six-monthly testing in the High Risk Area will, first and foremost, permit the earlier identification of the disease. Additionally, adding more regularity to the dates of the testing regime will provide more certainty to farmers.

We support the proposal to recognise the efforts that some herd owners have made to increase their resilience to bTB by allowing them to remain on annual testing.

We support the proposal to review the eligibility of herds for annual testing on an annual basis. We have concerns regarding two-yearly testing in the High Risk Area (detailed below)

It may be useful to ensure that vets and the public are aware that measures to control bovine tuberculosis will not be uniform and may vary from farm to farm, because of this proposal.

Q2. Do you agree that the minimum 60-day period between Short Interval Tests should be replaced by a minimum 90-day period in TB breakdown herds?
We broadly support this proposal as a pragmatic measure. This 90-day minimum period should be the time from test to test and not 90 days from reactor removal, otherwise the six-monthly testing windows will inevitably move. We acknowledge, this will increase the minimum time that some breakdown herds would remain under restrictions. However, on balance, this proposal complements 6 monthly routine surveillance testing, increasing the likelihood of detecting infected cattle at 90 days.

This proposal will greatly facilitate test arrangements for OVs and farmers. It will also lengthen the inter-testing interval which may be desirable and fit into other future proposed changes for other reasons.

Q3. Do you agree with our suggested criteria for annual or biennial surveillance testing for herds in the High Risk Area?
A proven track record of compliance with low risk trading guidelines and steps to increase resilience should be linked to a reduced burden of testing and regulation. In particular, we welcome the value assigned to CHeCS accreditation, which provides a holistic assessment of risk and demonstrates a proactive responsible approach on the part of the owner.

Any assessment that will result in the reduction in the testing regime must take purchase history into consideration. Consequently, we are unable to support the criteria “The herd has been in existence for at least 10 years and has never had a TB breakdown” as a standalone determinant.

We do not support the introduction of two yearly testing in the HRA. The risk of undetected infection attached to two-yearly surveillance testing in the HRA outweighs the convenience for the farmer. Consequently, assessment criteria for this purpose are inappropriate.

Compensation

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. As such, we welcome Government proposals to use incentives to keep disease out of herds and not reward those who undertake risky practices. In addition, farmers now have the option of engaging in the CHeCS TB programme which could also facilitate earned recognition.

Q4. Do you agree that 50% compensation should be paid for animals introduced into a TB breakdown herd that become test reactors before the breakdown is resolved?
We support a reduced rate of compensation for any animals brought into a TB breakdown herd after the service of movement restrictions which are removed as reactors to a TB test or as direct contacts before the breakdown is resolved. This support is on the basis that the overall aim is to encourage the keeper to alter his or her business practices to minimise movement and apply appropriate risk reduction measures. However, any reductions should be considered on a case by case basis, recognising that some movements may take place on welfare grounds.
To encourage good practice and to incentivise further take up of the CHeCS scheme there should be consideration given to limiting the reduction to 25% for CHeCS registered farms. Otherwise the application of a 50% reduction is appropriate to synchronise regimes between England and Wales.

Q5. Do you agree that 50% compensation should be paid for cattle that cannot be processed (for human consumption) at a slaughterhouse because they are unclean? We support proposals to limit compensation for cattle that cannot be processed (for human consumption) at a slaughterhouse because they are unclean.

Q6. Do you agree that a £5,000 cap on compensation should be introduced for any single animal? We support the principle of synchronising regimes between England and Wales. However, as we asked in our submission to the recent Welsh consultation, we would welcome further detail regarding the rationale behind the proposed £5,000 figure.

We would seek clarification on the operation of the compensation cap, and how this will interact with the penalties that have been proposed. Specifically, we would ask for clarification on the sequencing of the cap and penalties. In a small number of cases (for example with pedigree bulls) the variance between applying the £5,000 cap before a penalty or after the penalty could be thousands of pounds for the owner.

**TB Testing costs for certain types of herds subject to more frequent testing**

We believe if testing is a statutory requirement (for example if there was a considered risk that a herd may be infected) it would seem sensible that the government pay for this and ensure that testing is carried out in a risk-based, coordinated manner.

There are situations where responsibility for payment should rest with the animal owner.

Q7. Do you think the costs of the additional surveillance testing in Approved Finishing Units with grazing should in future be met by the operators? We note the value of the service provided by AFUs to the owners of some TB restricted herds. Under the proposals each AFU will receive one Government funded routine test a year (or two in the High Risk Area). Further testing should then be paid for by the AFU with grazing operator, in line with the principle of shared cost between government and operator.

Q8. Do you agree that Businesses in the Low Risk Area producing raw cows drinking milk and unpasteurised dairy products for human consumption should benefit from just one routine herd test every four years, with additional testing over and above this paid for by the business? We support the proposal for business producing raw cow’s drinking milk and unpasteurised dairy products to benefit from just one routine herd test every four years, with additional testing over and above this paid for by the business. This is on the basis that it reflects that it is a business decision to offer raw milk or unpasteurised products. As such, the cost associated with the additional risk attached to this practice should be borne by the business.
Q9-Q11. Extending the role of private vets to improve TB control
We support an extension in the role of private vets to improve TB control. This applies to the three cases specified in the consultation document:

- Suitably trained and accredited private vets should be required to provide evidence to APHA in order for the Agency to take a decision on the approval of candidate Approved Finishing Units and applications for TB-restricted markets.
- Once approved, Approved Finishing Units and TB restricted markets should be required to appoint an accredited private vet to provide regular reports to APHA confirming that to the best of his/her knowledge the premises continues to meet approval criteria.
- Re-stocking decisions made by APHA should be informed by an on-farm assessment carried out by a suitably qualified private vet.

In each case, we would ask that proposals around training and accreditation are clarified.

There must be clarity in the role of each vet to ensure all efforts are properly co-ordinated. Where a vet is appointed from a panel, and is not the unit’s normal private vet, the responsibilities of the private veterinary surgeon and the panel vet should be specified very clearly. Guidance that clearly communicates roles will be essential, specifically that the panel vet is responsible for monitoring of the unit to ensure it meets criteria while the private veterinary surgeon continues to be responsible for treatment and advice on unit generally. Ideally the panel vet and private vet will be the same person, if this is not the case, both vets should try and meet at least once a year.

Delayed slaughter of in-calf TB test reactor cattle
Q12/Q13. Do you agree that, subject to compliance with basic biocontainment/isolation requirements cattle keepers should be permitted to retain in calf TB test positive animals for up to 60 days to allow them to calve?

We are unable to support this proposal. There is a significant risk of transmission to healthy livestock attached to retaining an infected animal on a farm for up to 60 days. There is further risk for the farm staff. Additionally, allowing up to 60 days to calve would confuse the SIT timing and therefore every subsequent timing. As such, we are unable to support this measure at present.

Slaughter sales of TB restricted cattle in the Low Risk Area
Q14. Do you agree that sales in the Low Risk Area of TB restricted cattle intended for slaughter should not be permitted from 1 January 2018?

We support this proposal, which we believe would have a very limited impact on the industry and would provide further important support to the OTF status application for the LRA.

This proposal should be balanced against any welfare implications of transporting greater distances to slaughter.

Q15. Reducing the risks from the spreading of slurry and manure from TB restricted herds
We believe that the recommendation that slurry is stored for at least six months, should remain a recommendation. Placing a requirement on farmers for 6-month storage could lead to unintended consequences, such as an overflowing slurry lagoon. Farmers will require the flexibility to respond quickly to emergencies that may threaten the local environment or biosecurity. This would not be possible if farmers were required to apply to APHA for a specific licence.

**Q16. Minor changes to the Tuberculosis (England) Order 2014**
We agree with the proposal that owners of cattle that are compulsorily slaughtered because they are wild and untestable should be responsible for the costs of slaughter.