BVA SCOTTISH BRANCH RESPONSE TO BOVINE VIRAL DIARRHOEA (BVD)
CONSULTATION ON PHASE 5 OF THE ERADICATION SCHEME

1) 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.

2) BVA's Scottish Branch brings together representatives of the BVA's territorial and specialist divisions, government, academic institutions and research organisations in Scotland. The Branch advises BVA on the consensus view of Scottish members on Scottish and United Kingdom issues.

3) BVA strongly supports the Scottish BVD Eradication Scheme and its progress to date through the various phases of the scheme. We fully support the guiding principles of the scheme, which has been developed in partnership with key stakeholders in Scotland and encourages industry to lead from the front in the eradication of BVD.

4) We welcome the opportunity to comment on Phase 5 of the Eradication Scheme. We strongly support further restrictions on not-negative herds as a crucial end-step towards BVD eradication in Scotland. This will provide significant benefits to industry and recognise their efforts to eradicate BVD throughout the scheme so far.

5) Question 1: Do you think that keepers of cattle breeding herds that have recurring annual “not negative” BVD statuses should investigate the cause of BVD virus exposure in their herd?
We support the proposal to require keepers of cattle breeding herds that have recurring annual “not negative” BVD statuses to investigate the cause of BVD exposure in their herd. However, we would stress the need for measures, such as a comprehensive communications programme, to ensure that farmers are made aware of the proposals and the required processes to investigate the cause of BVD exposure before they are implemented.

6) Question 2: Should there be exemptions to the “sweeper test” where farms have a breeding herd but also buy stores for further fattening or finishing? If so, how would this work in practice?
We believe that farmers are sufficiently able to identify the status of bought in animals without necessitating additional testing of these animals. Therefore, we do not believe there should be exemptions.

7) Question 3: How long should affected herds be given to complete the “sweeper test”? Should it be completed relatively quickly?
There should be a period of no more than 3 months to complete testing of all cattle that
are on farm, however unborn cattle should not be part of this consideration. We would emphasise that keepers must be clearly informed of how long they have to complete the test and the exact expected date of completion for clarity.

8) **Question 4:** To take account of “Trojan cows” should the “sweeper test” include calf screening for 12 months following completion of the individual testing?
Yes. “Trojan cows” represent a significant way for BVD to be maintained on farm. We would recommend that that the status of new born animals should be reported within 2 months of birth or 1 month of registering with BCMS, and that failure to report should result in a non-negative status for the farm.

9) **Question 5:** Do you think that holdings that contain one or more live PIs should not be allowed to move cattle on to that holding? If so, what would you consider to be a reasonable time frame to allow the keeper to resample or remove the suspect PI/PI animal(s) from their holding? Should moves on to the holding be permitted, but limited to animals with an individual BVD negative status that have been vaccinated against BVD by a vet?
We welcome measures to move to protect animals moved on to holdings with one or more live PIs. We are concerned that it may not be economically viable to stop all purchasing of animals and movements on to holdings. However, in order to ensure that animals moved onto a holding are adequately protected, we would support that moves on to the holding are permitted, but limited to animals with an individual BVD negative status that have been vaccinated against BVD by a vet. The practicalities of vaccination should be considered when stipulating this requirement within a legislative framework – in order to ensure full protection from BVD the animal must have been vaccinated several weeks prior to movement on to the holding. In order to facilitate compliance with this recommendation, an additional field on ScotEID to reflect this vaccination requirement may be useful.

10) **Question 6:** Do you think that all virus positive cattle should be housed separately from animals with an unknown or negative BVD status?
We support the proposal for all virus positive cattle to be housed separately from animals with an unknown or negative BVD status.

11) **Question 7:** If virus positive animals must be housed, would inspection of these premises improve compliance?
We believe inspection of these premises would improve compliance, however this would have to be sufficiently enforced. There may be a role for the vet in inspecting these premises – this would depend on the level of inspection required and the provision of appropriate support and guidance for vets in this area.

12) **Question 8:** If virus positive animals must be housed, how could we prevent inadvertent spread of BVD virus to other cattle via clothing/footwear/equipment?
We would strongly recommend that keepers are encouraged to consult with their veterinary surgeon as to the appropriate biosecurity measures to take to prevent the inadvertent spread of BVD virus to other cattle in this scenario. Likewise, easily
accessible and digestible information as to the relevant biosecurity measures to implement would be useful and could be supported and disseminated through the main livestock and farming bodies in Scotland.

13) **Question 9:** Do you think that all tissue tag sampling should be carried out using only a primary/secondary tag?
   Yes – the use of these tags provides a robustness and confidence to the trading of cattle, as well as preventing the potential welfare compromise that could result from using several tags for tissue sampling.

14) **Question 9(b):** If not, do you agree that “not negative” herds are restricted to only using primary/secondary tags?
   As above, all tissue tag sampling should be from primary/secondary tags.

15) **Question 10:** The proposed restrictions to tissue tag sampling would limit tag testing to calves in the first 28 days of life. If keepers wish to test older animals, should they be permitted to use management tags for this purpose?
   No, there should be a requirement for these animals to be blood tested by a vet to prevent the need for further use of management tags and potential welfare compromise.

16) **Question 11:** An alternative to limiting tissue tag sampling to primary/secondary tags would be to require all tissue sampling tags to carry the animal’s official identification number. This approach would allow cattle keepers to continue to use 8 management tags for tissue sampling, provided that the tags were printed with the official identification number. Would you agree that management tags used for BVD tissue sampling must be printed with the animal’s official identification number?
   Yes – all BVD samples should carry the animal's official identification in order to prevent misidentification.

17) **Question 12:** Where the tissue tag has failed to produce a sample that is suitable for BVD testing, should management tags be allowed for retesting or should the animal be re-sampled by a private veterinarian i.e. blood tested?
   We would recommend that the animal should be re-sampled by a private veterinarian to prevent the potential welfare compromise that could result from using several tags for tissue sampling.

18) **Question 13:** Where a virus positive animal is retested to establish whether it is a PI or only transiently infected, should the retest sample be limited to a blood sample taken by the vet or is it acceptable for the keeper to re-sample using a management tag?
   We would recommend that the re-test sample should be limited to a blood sample taken by the vet to ensure traceability.

19) **Question 14(a):** Do you think that the check test should be amended to make it more effective? One possibility is to increase the number of samples submitted for
a breeding herd check test to a number equivalent to at least 10% of the number of calves born on that holding in the past 12 months, in addition to meeting the requirement for sampling 5 animals from each management group (10 animals in the case of the dairy check test).

We would welcome an amended test to make it more effective. However, any amendment would also need to be agreed in consultation with the CHeCS scheme to avoid inconsistency and a situation where a keeper could be negative according to the Scottish BVD eradication scheme but require additional testing to maintain CHeCS accreditation.

20) **Question 14(b): Do you agree that increasing the minimum number of samples taken at a check test would result in a more robust test?**

It is important to consider that the more samples taken on any farm the higher the probability that tests will find evidence of BVD. Any decision to increase the minimum number of samples taken at a check test must be balanced against cost benefit to the scheme and compliance by the farming community.

21) **Question 15: Do you think that the timescale for a BVD approved laboratory to report the result of a sample be reduced to 5 working days?**

We support reducing the timescale for a BVD approved laboratory to report the result of a sample to 5 working days where there is appropriate resource and capacity for laboratories to realistically achieve this.

22) **Question 16: Should the holding where the dam was resident on days 18-120 of pregnancy and the holding of birth be automatically given a “not negative” status as soon as the PI is identified? If so, what would we need to consider in order to avoid penalising holdings that have already carried out BVD investigations?**

Yes – however Scot EID should be adapted to be able to recognise and demonstrate that testing (particularly on the farm of origin) has already been carried out and all other PI animals have been identified and removed.

23) **Question 17(a): When tracking a PI back to their herd of birth, should this be restricted to confirmed PIs (i.e. those that have had a second positive antigen result at least 3 weeks after the first sample)?**

No – we would support tracing of all PI animals back to the herd of birth. In addition, if there is a PI animal on the holding, keepers should consult with their vet to assess the effectiveness of existing biosecurity measures and possible improvements to their biosecurity practices.

24) **Question 18: When tracking a PI back to their herd of birth, would this be better handled as an advisory matter, e.g. by sending a letter to the holding(s) concerned, possibly copied to their vet?**

At this stage we would recommend that this would be best handled as an advisory matter, where a letter to the holding concerned must be copied to their vet.
25) **Question 19:** Do you agree with the proposal to restrict the movement of untested animals off a holding until the results of the annual beef check test have been received?

We would strongly support the proposal to restrict the movement of untested animals off a holding until the results of the annual beef check have been received. All untested animals should be restricted to their farm of origin by default. However, to avoid unfairly penalising those who have consistently demonstrated freedom from BVD, restrictions should be risk-based and consideration should be given to exemption from this proposal for those who are demonstrated to have been consistently BVD-free.

26) **Question 20:** Could imposition of movement restrictions encourage cattle keepers to delay their annual check test until after young stock sales, with possible loss of eligible age animals?

Yes – we understand that this has occurred in some instances in Wales with regard to TB testing, whereby some animals are sold prior to the point of where TB testing becomes mandatory so as to avoid any potential movement restrictions.

27) **Question 21:** Should more use of ScotEID be encouraged, e.g. through guidance or at road shows rather than via legislation?

We would strongly support further encouragement of the use of ScotEID. Encouragement could be promoted through guidance, information campaigns and road shows.

28) **Question 22:** Does this proposal unfairly penalise beef breeding herds that have had a BVD negative status for several years?

As outlined in question 19, to mitigate unfairly penalising beef breeding herds that have had a negative status for several years, the proposal to restrict the movement of any animals off the holding that do not have an individual BVD status until the result of the annual check is uploaded to ScotEID should be risk-based, based on an assessment by the veterinary surgeon as to the herd in question, with consideration given to exempting those farms who have demonstrated a consistent freedom from BVD.

29) **Question 23:** Do you think that the Scottish Government should publish location details of virus-positive cattle?

We support the proposal to publish location details of virus-positive cattle. However, we would stress the need to ensure that all farmers are fully aware of the proposals before they are implemented. The information regarding virus-positive cattle would raise awareness amongst other farmers in the locality of increased risk of BVD. This awareness has the potential to increase the implementation of boundary biosecurity and vaccination of vulnerable stock to prevent the further spread of the virus.

30) **Question 23(a):** If you answered yes to question 23, how long should cattle keepers be given between first disclosure of a virus positive animal and publication of its location?

Cattle keepers should be given two months between first disclosure of a positive animals and publication of its location to allow time for retesting.
31) **Question 23(b): If you answered yes to question 23, what format would you like to see for publication of PI location? Examples could include: a list of CPHs published on ScotEID; an interactive map; written notification to neighbours.**

Virus-positive cattle should be identified online both in list form and on an interactive map, although care should be taken to ensure that no personal information about the farm or farmer is divulged. We would also recommend that local vets in the area are notified so that they can proactively work with other clients in the locality to take risk-based measures to prevent the transmission of BVD.