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

3) We were pleased to have been given the opportunity to respond to Welsh Government proposals on TB eradication. 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. We have previously stated that the control and eradication of bTB must be based on the application of sound scientific research coupled with the application of sound veterinary epidemiology. Comprehensive cost effective control and eradication of bTB from cattle and wildlife populations must be the ultimate aim.

4) We understand that TB incidence and prevalence are not uniformly distributed throughout Wales and that, following almost seven years of annually testing all cattle herds, Welsh Government now has an extensive dataset showing a detailed picture of disease in cattle across the country. For this reason, we fully support and welcome the principle of a regionalised approach to eliminating TB in Wales and are particularly heartened to see the focus on risk-based assessment and the targeting of chronically infected herds with individual action plans, to be developed in partnership with farmers, private vets with local knowledge, and the APHA.

We support the intention to explore and develop ways to break the transmission cycle between cattle and badgers where it can be demonstrated badgers are contributing to the problem in chronic herd breakdowns and therefore would welcome clearly presented specific figures in relation to the number of TB positive badgers found in the High TB Areas.

However, we are concerned that if badger culling by “cage trapping and humane killing” (as detailed in the Cabinet Secretary’s statement 18 October) is to be part of the refreshed eradication plan there needs to be much greater clarity with regard to the proposed method(s) of humane killing. From an animal welfare perspective the technical detail of how lethal injection might be carried out requires careful consideration, including the type of drug used, whether sedation would be required beforehand, and the technical skill of the operative. The variables for lethal injection must be tightly controlled and it may be that cage-trapping and shooting remains the preferable option. We would urge the Welsh Government to provide specific detail on the proposals.
The Cabinet Secretary’s statement alludes to the TVR approach taken in Northern Ireland. Although there are limitations in the diagnostic tests that are currently available we hope that the TVR study will provide some quantification and some validation for the deployment of these tests and that the results will help inform future eradication policy decisions. We support the principle of learning from the TVR study but would urge caution that it may yet be too early to draw conclusions.

We are concerned that there is currently no detail as to how any badger cull areas in Wales 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.

**TB incidence categories**

5) We are broadly supportive of the proposed TB incidence categories and the designations outlined in the consultation document. However, we would welcome further information in relation to the north-western edge of the area defined as High TB Area (Border), which appears to share a border with the Low TB Area of North-West Wales. We are unclear on whether the topography of the area includes natural or man-made barriers which would contribute to the reduction of wildlife movement and cattle to cattle contact between the areas. If that is not the case then consideration must be given to how the encroachment of disease from the High TB Area to the Low TB Area might be prevented, and monitoring in the area must be enhanced.

6) We fully support the four basic principles of infectious disease control as outlined in the consultation paper. Regarding the specific measures proposed:

**Low TB area** – we strongly support proposals to remove some PrMT exemptions in order to ensure that all animals moving into the area will be required to have a PrMT. We also strongly support proposals to require that cattle moved into the area from areas with a higher TB incidence are PoMT. With regard to routine testing, we support the continuation of annual testing plus the introduction of six monthly testing for high risk herds. The measures outlined appear to offer a pragmatic risk-based approach to protecting the favourable status of the area and working towards elimination. We believe that the intention to offer and encourage Cymorth TB visits for all keepers in the area will play an important role in engendering buy-in and fostering ownership of the disease situation. We would urge Welsh Government to provide sufficient notice to practices so that staffing levels can meet the demands of extra testing and Cymorth TB visits if the proposals are fully adopted.

**Intermediate TB areas** – as for the designated low TB area, we strongly support the proposed measures with regard to PrMT, PoMT, and routine testing.

We would question why there does not appear to be a proposal to expand Cymorth TB visits in the Intermediate Risk Area. We strongly suggest that wider roll out should form part of the strategy for this area, and that private vets can play a key role in managing TB risk on their own clients’ farms.

Regarding control in the wildlife reservoir, we note the proposal to encourage badger vaccination when the vaccine becomes available. Although it currently remains unclear when that will be, and production must be made an urgent priority, careful consideration must be given to where it might be most effectively deployed in future.
In December 2015 we expressed concern regarding the significant blow to the eradication programme as a result of the global shortage of the BCG vaccine and urged Welsh Government to reconsider its approach to eradication in the wildlife reservoir and identify an evidence-based solution to ensure that any potential progress that had been made was not lost.

In the Intermediate TB area of North-east Wales the evidence suggests that the majority of breakdowns are related to the movement of cattle into the area from endemic TB areas of Shropshire and Cheshire. However, this is not the case in the Intermediate TB Area of mid-Wales where evidence suggests that many new breakdowns are the result of direct or indirect contact with neighbouring cattle or wildlife. As the drivers for disease spread in the two Intermediate TB Areas are different we would suggest that approach to control in the wildlife reservoir should, at the very least, be tailored to the different circumstances identified in the consultation document and that priority should be given to the Intermediate TB Area of mid-Wales as soon as vaccine becomes available.

**High TB areas** – We strongly support the pragmatic proposals in relation to testing and movement restrictions, as well as the enforcement of compliance with Biosecurity Improvement Notices. Whilst we consider that it may be easier to encourage keepers to adopt robust biosecurity if there remains a continued focus on a science-led approach to the control of the disease in wildlife reservoirs, acceptance of full biosecurity measures cannot be predicated on the adoption of wildlife controls considered acceptable on the basis of keeper opinion.

The consultation document states that the badger found dead survey has confirmed the disease is present in a proportion of the local badger population. As stated in paragraph 4, we would welcome clearly presented specific figures to support this statement before the appropriateness of any interventions to break transmission routes of disease between cattle and wildlife can be assessed. It is critical that any badger interventions are fully justified and supported by sound scientific evidence.

We strongly support the intention to work towards the expansion of Cymorth TB to provide bespoke veterinary advice to all herds in the area. However, as Cymorth TB is a support tool, keepers should not be penalised on the basis of resulting advice.

**Testing**
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. However, where an uncontrolled reservoir of disease exists in the local wildlife as a source of reinfection the use of interferon gamma testing should be considered on a case by case basis to prevent ongoing losses. The loss of false positive animals removed from the herd in order to achieve free status while leaving an uncontrolled reservoir of disease in the local wildlife as a source of reinfection cannot be justified.

Effective communication with keepers with regard to this form of testing will be key, given the potential for the application of a retrospective severe interpretation.

We also have concerns regarding the potential for different interpretations across the different areas. It is essential that test interpretations are as consistent as possible across the regions and consideration must be given to how this will be facilitated (suggestions include the provision of case studies detailing the more complex situations; the testing matrix to be included as part of the material in SAM; Welsh Government to work with software companies to ensure that correct and consistent interpretations are generated every time, including in the High TB

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 restriction to holding of standard interpretation inconclusive reactors is proportionate to the risk of subsequent disease disclosure. We would request however that the risk basis for restriction to holding of severe only inconclusive reactors should be presented and considered before this is implemented.

Consideration should also be given to how any inconclusive reactors disclosed will be identified. There is potential for genuine confusion due to a greater likelihood of tag losses as a result of increased longevity. DNA tagging, by an OV, may present a solution. The Cattle Tracing System should also be utilised and the changed status of the animal recorded on its passport.

Other measures

7) Biosecurity
We strongly support the proposal to develop an online standardised biosecurity package. This should be done in close liaison with industry in order to achieve a set of standards that are realistic and achievable and therefore credible and supported by farmers. As the role of the vet is crucial in advising farmers and promoting best practice in biosecurity and as vets in Wales have been delivering the Cymorth TB programme, of which biosecurity is an important component, we see an opportunity for Cymorth TB to act as a benchmark.

8) Compensation
We have previously suggested that the Welsh Government should consider how it might incentivise farmers to engage with disease control through good biosecurity and risk based trading decisions, and we have also suggested that elements of “Cymorth TB” concepts and BCVA’s TB Plus could provide templates for this. As such we welcomed Welsh Government’s proposals to amend the TB (Wales) Order 2010 to offer increased incentives to keep disease out of herds and penalise those who undertook risky practices. In addition farmers now have the option of engaging in the CHeCS TB programme which could also facilitate earned recognition.

9) At the time we supported the proposed compensation cap of £15,000 per animal, but in light of the future loss of European Commission funding as a result of Brexit, we support the proposed reduction of that cap. However, we would welcome further detail regarding the rationale behind the proposed reduction to £5,000 per animal when the financial implications of Brexit on government agricultural funding are not yet known.

10) We support the proposal to extend the arrangements for reducing compensation paid for animals brought into a restricted herd under license to movements between units within the same herd where the breakdown has been open for 18 months or more, or has had recurrent infection. We support this 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. We would welcome further information in relation to how these arrangements will be interpreted when different parcels of land are in different risk areas, and would support the principle of treating all parcels of land according to the rules applied to the parcel identified as highest risk.
11) **Cross compliance**
We support the proposal to link compliance with CAP scheme subsidy payments and the suggestion that breaches of the TB (Wales) Order will attract percentage reductions, providing those reductions are proportionate. We would welcome further information on proposed protocols to ensure a follow up Cymorth TB visit/APHA vet visit when a Veterinary Improvement Notice has been issued.

12) **Finishing Units**
We support the intention to continue not to permit Approved Finishing Units in the Low Risk Area. We consider that the option to no longer permit Exempt Finishing Units in the Low Risk Area, and revoke the authorisation of existing EFUs, is preferable from a disease control point of view. Six monthly testing may not be sufficient to protect the status of the area should disease be introduced through this route. Every effort should be made to replace existing FUs that would lose their licence as this outlet is critical for many farms who cannot cope with increased stock numbers whilst under restriction, which can have serious welfare implications. Currently only indoor units are permissible in Wales and these must have adequate biosecurity to reduce risk of transmission via personnel, equipment, and from wildlife. We support this approach.

13) **Non bovines**
We note the Welsh Government intention to consider the possibility of extending the 2011 Order to cover other susceptible species such as pigs and sheep. We would strongly encourage such a review but would like to stress that this should only apply to “farmed non-bovines” in these species groups, not “pets”. BVZS believe that tighter definition is also required to specifically exclude zoo-captive wild species in these groups, managed in zoo scenarios, due to issues particularly of practicality; safe capture, handling and restraint of these animals in zoos, which may require general anaesthesia for the safety of personnel.

14) **Informed purchasing**
We support the principle of risk-based trading and as such have previously fully supported Welsh Government proposals on sharing the location of TB infected farms, with the necessary safeguards in place in relation to personal information about the farm or farmer. We support the principle of adoption of a risk-based trading system in the longer term, subject to appropriate consultation with stakeholders and industry. This is another area in which the CHeCS TB programme could play a role.

15) **Governance**
We support the principle of regional boards and believe that the involvement of private vets and working farmers are crucial to success.

16) **In conclusion,** we are supportive of the Welsh Government proposals for a refreshed TB eradication programme, in particular a targeted approach based on sound veterinary epidemiology and disease control principles. We support the intention to explore and develop ways to break the transmission cycle between cattle and badgers where it can be demonstrated badgers are contributing to the problem in chronic herd breakdowns, but it is critical that any badger interventions are fully justified and supported by sound scientific evidence.