BVA and BCVA response to Department for Environment Food and Rural Affairs consultation on bTB: proposal for Biosecure Rearing Unit

Who we are
BVA is the national representative body for the veterinary profession in the United Kingdom and has over 18,000 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.

Introduction
We welcome the opportunity to respond to this consultation on the introduction of Biosecure Rearing Units (BRU), as 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.

In writing this response we recognise the brevity of the consultation document and the limited detail provided with which to base a response. We would welcome further details being made available for comment prior to a final decision being taken on the viability of this proposal.

BVA and BCVA cautiously welcome the proposed development of Biosecure Rearing Units, where appropriate biosecurity measures are embedded to ensure the risk of transmission of the disease is minimised.

We welcome that BRU operators would be required to comply with existing AFU grazing terms and conditions with enhanced biosecurity controls. Consistency, where possible, in the application of conditions and rules provides clarity to farmers, vets and the potential operators of BRUs. We agree that additional safeguards are required given the level of risk associated with the proposal.

Other species
We welcome the application of additional biosecurity controls in the case of BRUs. We would ask for clarification on the restriction on other species of livestock using the
grazing areas. We would ask if this is intended to be an ongoing prohibition, or simply refers to co-grazing of the land.

If this is intended as an ongoing prohibition, consideration will need to be given to pasture management. Specifically, as there may be periods where grass will not be grazed, clarification will be needed on whether any grass that is collected from pasture will be available for distribution as silage to other units.

Ongoing assessment and advice
We strongly support the proposal for any potential BRU operator to participate in a TB Advisory Service visit and implement all biosecurity recommendations before approval and licensing by APHA. The TB Advisory Service carries out a significant role in advising on the biosecurity of all farm units. We agree that this role for TBAS should not lead a reduced role for APHA and ultimate responsibility for the assessment of risk and licencing should sit with APHA.

We would ask for further detail on how the current TB Advisory Service process will be adapted to meet the additional risk profile of BRUs. Guidance to TBAS advisors is to provide four key recommendations to the farmer. However, four changes may not be adequate to meet the level of biosecurity necessary for an APHA licence to operate a BRU.

Under the proposal each BRU will be required to undertake one visit. However, biosecurity risks are dynamic and change over time. We would ask that additional consideration to be given to this assessment, both on the date of implementation and in a process of ongoing evaluation. Given the novelty of the proposal and the risk associated, we would welcome provision for more ongoing assessment of risk and provision of biosecurity advice.

Contingency planning
Appropriate contingencies are vital to minimising the risk associated with this proposal and providing the assurance needed for BRUs to operate. Therefore, we welcome that the proposal includes a requirement for each BRU to hold a written contingency plan and biosecurity protocols which have been signed off by the operator’s private vet and approved by APHA.

We would ask for further clarification on how these contingency plans would operate and the standard they would be expected to meet to receive APHA approval.

Feeding of concentrates
We welcome proposals for all housing to be wildlife proof. Feeding of concentrates furthers the goal of maintaining a high level of nutrition with high growth rates and improved resilience which will support the economic viability and attractiveness of such units. This must be balanced with maintaining biosecurity and reducing any risks.
We would ask for clarification that the feeding of concentrates indoors will remain an option open to the operators of BRUs. We would ask for clarification on the decision that supplementary feeding of concentrates would be prohibited, for example an explicit recognition that such supplementation can be made during housing, with appropriate biosecurity applied.

**Age restrictions**
We welcome that BRUs would be able to source calves under 42 days old. Younger calves are understood in current literature to represent a lower risk than those of greater age. Clarification on how the 42-day age limit was reached would be appreciated to determine if this is the appropriate point to place an age restriction.

We would ask that this age restriction be kept under review as new evidence emerges on relative risk associated with the age of cattle.

**Testing**
We would welcome further clarification of the proposed testing regime to ensure freedom from bTB before allowing grazing, particularly as these animals will represent an increasing risk of spreading TB to wildlife in future years if current control measures in the HRA are progressively successful.

We welcome the proposal to test twice at severe interpretation, as the minimum level of assurance given the increased risk before cattle are permitted to graze. However, the young age of the animals may compromise detection of TB as the skin test is known to be most effective later in the course of disease. The use of the gamma test which can detect infection earlier may be a more appropriate approach to ensure BRUs remain free of disease and would more effectively minimise the risk of infection remaining undetected.

**Conversion of AFUs**
The consultation document notes that BRUs would only usually be approved on premises that are OTF. However, exceptions would be made for operators of AFUs with grazing that wish to convert their unit into a BRU. We would appreciate clarification on how these exemptions would operate, and the biosecurity measures that would be required before approval was granted.

**Batch System**
We welcome the batch system approach adopted, would seem to minimise bTB transmission between separate batches. It would be useful to have more clarification on the operation of the batch system. We would seek clarify on protocols when bTB is found within a batch, specifically how the risk of undetected infected calves in the remainder of the batch will be dealt with.
Conclusion
BVA and BCVA cautiously support the proposals outlined in the consultation document. This is a welcome development where appropriate biosecurity measures are embedded to ensure the risk of transmission of the disease is minimised. Unfortunately, the detail provided within the consultation documents outlining those additional biosecurity measures lack detail. Therefore, we would ask for clarification on the points raised above to provide assurance that appropriate safeguards will be in place.