BVA response to Defra consultation: Improving TB cattle controls, including a proposal for statutory post-movement testing

Introduction and background

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom and has over 15,000 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. We appreciate the opportunity to contribute to this consultation. We support the use of strengthened cattle measures, but stress that these must be used alongside measures to tackle bovine tuberculosis (bTB) in wildlife. In order to reflect regional differences in the prevalence of the disease we continue to support a local, risk-based approach.

Proposal to amend The Tuberculosis (England) Order 2014 to require post-movement testing of cattle entering (directly or via a market) the low risk area (LRA) of England from herds in England on annual (or more frequent) surveillance testing and from herds in designated counties in Wales.

3. BVA supports the proposal to introduce strategic post-movement testing of cattle entering (directly or via a market) the low risk area (LRA) of England from a high risk area (HRA) in England or Wales. This is a sensible measure to reduce spread of disease within and between cattle herds and may start to pave the way for parts of the country to be declared bTB Free along with Scotland. It is also consistent with the Risk-Based Trading Board proposals and with the probable CHeCs guidelines. We assume that cattle movements from a HRA in England or Wales to a LRA in Wales would also be subject to post-movement testing.

Proposed post-movement test type

4. It is our understanding that the single intradermal comparative cervical tuberculin (SICCT) test is currently used alongside the IFN-γ blood test in all lesion- or culture-positive TB breakdown herds in the LRA and Edge Area (EA) in order to maximise the detection of infected cattle and we remain in favour of this strategic approach\(^1\). The reasoning behind the introduction of post-movement testing is to improve the early detection of infected cattle moved to the LRA, but the SICCT test is weakest when used to test small groups and takes longer to return results. According to the figures provided in the Economic Assessment, for every 100,000 animals tested the compulsory use of the IFN-γ test would result in the identification of 100 times more false positives than the SICCT test, even when calculated using the highest specificity estimate, 98%, for the IFN-γ blood test. Consequently, BVA is not currently

\(^1\) 2011 BVA Policy Brief - Bovine tuberculosis
supportive of the introduction of IFN-\(\gamma\) blood testing for compulsory post-movement testing.

5. We understand that the support for post-movement testing in the 2014 Defra cattle controls consultation was based on Scotland’s example, which uses the SICCT test only and consequently the issue of increased cost if the SICCT and IFN-\(\gamma\) tests were both used may be a barrier to this proposal.

6. BVA would urge flexibility and dialogue with local vets to better target use of the SICCT test alongside the IFN-\(\gamma\) test in HRA in order to mitigate the risk of adverse impacts on business viability and consequential health issues where a high percentage of the herd has been removed and re-stocking is required.

Proposed exceptions to post-movement testing

7. We support the proposal to include the listed exemptions to post-movement testing provided they are not associated with any substantive increase in the risk of disease translocation. With regards to the requirements for show animals we are keen that Defra provide further information on what would constitute ‘housed’ as the current wording is not clear.

Proposal for a more robust approach to dealing with breakdowns in the HRA

8. We support the extension of the EA testing policy to the HRA and the inclusion of herds in the LRA under this testing regime where their specific circumstances warrant a more robust approach. However, we believe in a comprehensive approach to the control of bTB and we are keen to reiterate that more stringent testing in the HRA should occur alongside control of bTB in wildlife reservoirs.

9. If the proposal to extend the EA policy to the HRA goes ahead, BVA would support the proposal to no longer distinguish between Officially TB Free Suspended (OTFS) and Officially TB Free Withdrawn (OTFW) breakdowns in official correspondence. It is a logical sequel to the disregard of post-mortem or laboratory culture results.

Proposal to allow cattle movements to/from rented grazing within a 10mile radius of the herd owner’s home premises without pre-movement testing.

10. We broadly support this proposal in line with the findings of the MacDonald report. Therefore, we agree with the proposal to limit movements to a maximum distance of 10 miles from the herd owner’s home premises. However, we believe that careful consideration must be given to the way in which such a limit could be audited and enforced. It should be noted that some movements within a 10 mile maximum distance limit could still result in the movement of high risk animals to areas of lower TB prevalence and therefore appropriate risk assessments and restrictions would need to be applied, particularly with reference to movements from a HRA into an EA, an EA into the LRA or cross border movements between England and Wales or England and Scotland.
Proposal to phase out exempt finishing units in the LRA

11. BVA believes that the movement of cattle to exempt finishing units in the LRA without a pre-movement test risks undermining the efforts to secure OTF status for the LRA. The move to permit the seven existing exempt finishing units within the LRA to apply to instead become ‘Licensed Finishing Units’ should help to mitigate this risk whilst facilitating ongoing trade.

Proposal to reduce bTB risks from Approved Finishing Units (AFU)

12. In order to help minimise the risk of transmission of bTB between herds and between species it would be sensible for AFUs within the HRA to be discrete, self-contained units comprising contiguous parcels of grazing land.

Proposal to reduce TB risks from the sale of cattle originating from 4-yearly testing herds.

- Pilot a voluntary scheme to mitigate risk of TB transmission via dispersal sales (and other sales of large groups of cattle from a single herd) from 4 yearly herds by offering a Defra-funded TB herd check test before presenting animals for sale.
  - Eligibility criteria: lot size, type of animal, time since last negative TB herd test on the farm of origin.
  - Identify how best to encourage uptake
  - Decide how success should be measured, length of pilot and how to modify scheme in response to uptake.

13. BVA would support such a pilot scheme, which may help to mitigate the risk of unidentified infected cattle from LRA herds with no recent history of bTB. However, historically, voluntary schemes have had little uptake amongst herd owners and it may be more pragmatic to introduce a requirement for pre-movement testing where LRA herds are planning to disperse or sell to multiple buyers. We are in favour of purchasing advice including a recommendation for pre-movement testing as a condition of sale.

Proposal to enhance TB surveillance in the Edge Area (EA)

- 6 monthly testing in the parts of the EA where there has been the greatest increase in the number of new infected herds.

14. BVA is of the opinion that the introduction of six-monthly or radial testing in EAs where there has been the greatest increase in the number of newly infected herds would be a sensible measure, which would permit both the earlier identification of the disease and more accurately define the limits of the edge area and add some regularity to the testing regime.

Proposal to define situations in which private interferon-gamma (IFN-γ) blood testing could be permitted, e.g.:

- Supplementary pre or post-movement TB testing of cattle that are not subject to (or have passed) a compulsory pre-movement skin test;
- TB screening of animals joining ‘high value’ herds, including pedigree bulls entering semen collection centres;
- A marketing tool for herds/animals intended for sale;
- Ad hoc testing of herds/animals following a negative routine or tracing skin test;
- Private rapid re-testing of inconclusive reactors (IRs) to a skin test;
- Supplementary testing of non-reactor cattle in TB breakdown herds (i.e. animals that have passed a short interval skin test and do not qualify for a government-funded parallel IFN-\(\gamma\) test).

15. We understand that the IFN-\(\gamma\) test has been applied as a supplementary test in specific situations and we support the use of privately funded additional IFN-\(\gamma\) testing in situations where there is a need to remove all infected animals as quickly as possible, even at the expense of losing some uninfected animals as false positive reactions. However, we would be cautious about the use of IFN-\(\gamma\) as a screening test in HRA herds because 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. Consequently, we would support its use in the following circumstances and under the assumption that test positive animals are compensated at normal values and the herd enters the control/testing cycle as with normal routine testing:
   a. TB screening of animals joining ‘high value’ herds, including pedigree bulls entering semen collection centres;
   b. Ad hoc testing of herds/animals following a negative routine or tracing skin test.
   c. For farms wanting extra security when buying in animals.