BVA response to Defra consultation: Bovine TB in non-bovine farmed animals a call for views

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. This is a joint response in consultation with our Veterinary Policy Group, which includes representatives from the British Cattle Veterinary Association, Pig Veterinary Society, Sheep Veterinary Society, Veterinary Deer Society, and British Veterinary Zoological Society. We have also consulted our specialist division, the Goat Veterinary Society (logos from left to right above).

3. We appreciate the opportunity to contribute to this consultation. We have previously stated the need for a comprehensive approach to effectively tackle bovine TB, and our position states that 'control measures in cattle must be accompanied by simultaneous and co-ordinated measure in badgers and other wildlife and susceptible farmed species including deer and camelids...'

4. We are pleased that Defra is reviewing measures to tackle TB in non-bovine farmed species. More work is needed to improve diagnostic tests for TB in non-bovines, and we urge Defra to work with other UK administrations to develop these tools.

5. We are particularly concerned about the potential risk of disease transmission from South American Camelids to humans due to the extensive and aggressive pathology of the disease in these animals. We accept that in the few cases where there has been camelid to human transmission there has been regular and prolonged contact between the human and the affected animal. However, these cases demonstrate that a clear zoonotic risk exists. Furthermore, these animals are increasingly seen out at pasture in high risk areas for bovine TB where they are used as sentinel animals for flocks of sheep and poultry, and at petting zoos where they present a heightened zoonotic risk as the human contacts could include vulnerable individuals such as immunosuppressed individuals and small children whose understanding of hygienic precautions is limited.

6. It should be noted that a proportion of non-bovine species are kept as companion animals, and consideration should be given to the wording of any legislation/guidance to ensure that it is clear to what extent legislation refers to them,
and that if it does, the terminology used does not alienate companion animal owners (e.g. euthanasia rather than slaughter). This consideration must take into account animals such as pigs, when kept as companion animals, and be robust enough to withstand any legal challenge.

7. BVA would like to underline that this response is directed at bovine TB in non-bovine farmed animals. BVZS has emphasised that answers to these specific questions about farmed animals should not be taken as cross-applicable to bovine TB affecting non-bovines in zoological collections, and that further consultation would be required. This is clarified further in our response to question 9.

Question 1: Are these the right principles?

8. BVA believes the primary responsibility for the control of bovine tuberculosis (TB) rests with the state and where disease is known or suspected the state must act to control spread. However, BVA supports the continued responsibility for TB surveillance in live non-bovines resting with the keepers of the animals and TB reporting from both private veterinarians and animal owners, supplemented for meat producing animals by statutory post-mortem examination. In circumstances where suspicion of disease is high, for example when a camelid herd is surrounded by bovine herds with ongoing breakdowns, statutory testing paid for by the government should be an option.

9. We support the introduction of statutory powers for the testing and removal of TB reactors alongside statutory compensation, which should be developed in consultation with the relevant sector. It is important that reactors can be removed quickly to stop disease spread. BVA supports 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 bio-security practice within the particular livestock sector (e.g. appropriate handling of animal by-products, pre-movement testing, isolation of reactors etc.) However, an appeals process must be in place to protect those keepers whose lack of compliance with statutory disease control or accepted best bio-security practice is as a result of circumstances outside their control.

10. Although it is currently believed that the incidence and risk of transferring infection from non-bovine species to cattle is low, we support a minimum of regulation on non-bovine farm businesses and allied sectors at the current time, and suggest that resources should focus on the problem in cattle. Instead, we endorse a risk-based approach to testing, supported where appropriate by post-mortem monitoring. This approach should be kept under review to ensure that the government can respond if circumstances change.

11. With regards deer, the Veterinary Deer Society have advised us that any testing needs to take into account routine management practices and the ability to handle deer safely and with regard to their welfare.

12. It is interesting to note that the recent Scottish government rules regarding control of bovine TB in non-bovine farmed animals included a requirement for the identification of camelids and deer and prohibition of treatment or vaccination against bovine TB without written consent. BVA supports the view that these measures should be included for non-bovine farmed animals in England.

Question 2: Do you think the duty to report suspicion of TB in a bovine animal should also apply to non-bovine animals?
13. BVA supports the extension of the statutory duty to report suspicion of bovine TB infection from captive deer to all live non-bovine farmed animals as a sensible accompaniment to the introduction of statutory powers for the testing and removal of TB reactors alongside statutory compensation.

14. Point three of the policy principles outlines the potential sequelae upon report of suspicion of bovine TB. It would be beneficial to clarify the action that would be taken following such a report including the type of test to be used for the particular species, whether a single animal, single cohort or the whole herd would be tested, and the action that would be taken in the case of an inconclusive result. A lack of clarity in this area may lead to under-reporting due to fears of future business viability. Furthermore, BVA would like to express concern about the reduced access to post-mortem services in England and Wales, which may result in many potentially infected non-bovine farmed animals being sent for local disposal with no examination.

**Question 3: How could Defra facilitate the development of voluntary surveillance and testing schemes for non-bovine animals?**

15. We note that in England, the camelid industry has developed a voluntary health surveillance scheme including pre and post movement testing and recording of camelid movements. Defra has said that they will continue to monitor options for statutory surveillance if the voluntary scheme does not deliver the desired results.

16. If voluntary surveillance and testing schemes for non-bovine farmed animals are to prove effective they must have enough sign up. To that end, it is essential that schemes include species-specific statutory compensation, relevant protocols and criteria are agreed with each species sector and concerted promotional activity to raise and maintain awareness.

17. The Veterinary Deer Society (VDS), a specialist division of BVA, informs us there is an opportunity for a new voluntary deer health scheme to be established using an ELISA test in deer primed by the Single Intradermal Comparative Cervical Tuberculin (SICCT) test. By working with the deer farming industry, their veterinarians and researchers, APHA have the opportunity for a partnership approach to validate this scheme, allied with realistic compensation for compulsorily slaughtered animals. VDS in particular would welcome further discussion on the issue; including whether the standard SICCT test interpretation (along with the ELISA) could be used rather than the severe interpretation. Application of severe interpretation SICCT testing is difficult in practice and potentially renders herds permanently subject to movement restrictions.

18. The Goat Veterinary Society (GVS), a specialist division of BVA, supports the development of voluntary surveillance and testing schemes. Where very large goat units are to be tested they propose the use of statistical sampling protocols, which are widely used in other disease control situations. Furthermore, they support the use of government funding to explore other tests for bovine TB in goats and their sensitivity/specificity and potential value as tools for surveillance.

19. In light of the increasing number of post mortems likely to be carried out by private veterinary surgeons following the roll out of Surveillance 2014, the GVS raised concerns about the knowledge of bovine TB pathology in goats and other non-bovine farmed species. It may be beneficial to consider an awareness campaign or government funded CPD.
Question 4: Should the provisions introduced in October 2014 for camelids requiring consent for TB testing and notification of results apply to all farmed non-bovine species?

20. It seems a logical extension that the provisions should extend to all non-bovine farmed species and this information should be readily available due to the monitoring of tuberculin supply by APHA. However, BVA believes that the statutory obligation should be to report any positive result to APHA. In some cases where a test is required at short notice, the need to seek consent may be an impediment to testing. We would appreciate clarification on what grounds might consent to test for bovine TB be denied.

Question 5: Who should pay for statutory TB surveillance testing of non-bovine animals, and why?

21. If testing became 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. BVA recognises that the handling and testing of deer poses particular challenges with regards their safety, health and welfare.

Question 6: Should statutory compensation for compulsory slaughter be extended to all non-bovine farmed animals and, if so, how should the amounts be set?

22. Yes, BVA believes that if an animal or group of animals is compulsorily slaughtered for the purposes of statutory disease control, compensation should be paid. Compensation should be paid for a recognisable and discrete epidemiological unit. Reimbursement for losses suffered by the animal keeper should be equitable and reflect the market value of the animal slaughtered or where insufficient market trade exists be defined in agreement with the species sector. 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 are firmly of the view that a level playing field should be established for all livestock species.

23. For goats, a scale of compensation is already agreed with the Wales devolved administration and any compensation agreed in England should be consistent with this. BVA understands that camelid compensation is different in England and Wales and urges that the two are brought into line to ensure consistency across the United Kingdom.

Question 7: Should keepers of meat producing non-bovine farmed animals have the opportunity to secure for themselves a salvage value individually negotiated with a slaughterhouse operator for compulsorily slaughtered animals?

24. In principle, yes, if there is salvage value available it would be sensible for this to feed into the process to reduce the overall cost. It is important that this facility did not delay the process leading to reactors being held on farm for a prolonged period. However, considering the variability in the severity of pathology seen across different non-bovine farmed species it may not be practical where carcass value is not much greater than compensation value.
Question 8: Should Government vary compensation for compulsorily slaughtered non-bovines, to reward good behaviours or penalise bad practices? If so, how?

25. Yes, BVA supports the principle of a reduction in compensation where there is lack of compliance on the part of the keeper with statutory disease control or inadequate biosecurity (e.g. appropriate handling of animal by-products, pre-movement testing, isolation of reactors etc.) However, an appeals process must be in place to protect those keepers whose lack of compliance is as a result of circumstances outside their control. It is important to note that compliance is influenced by the confidence animal keepers have in the tests applied.

Question 9: Do stakeholders agree that the approach to non-bovine (companion and zoo) animals is proportionate and targeted to the risk?

26. BVA considers that whilst the approach is proportional there remains a lack of clarity regarding the ways in which companion, zoo and exotic animal collections will be treated during confirmed incidents, and in certifying freedom of disease. It has not always been clear that this response is regionally coherent across England, and members of the British Veterinary Zoological Society (BVZS), a specialist division of the BVA, have reported unhappiness with the degree of proportionality in different areas and the cost of the response to confirmed incidents.

27. The circumstances surrounding/implications of bovine TB confirmations in non-farmed exotic companion non-bovines, and in non-farmed zoo non-bovines are very different from those applicable to farmed species. Differences include rarity and difficulties of replacement of endangered species in stable breeding programmes, ease of handling, management scenarios and degree of access to other species and humans, availability and validation of TB testing, inconsistency in approach between different Animal Health regions and PHE and APHA laboratories to different species (particularly primates), and concurrent regulation of relevance such as zoo licencing requirements and BALAI status.

28. Therefore, BVA wishes to make it completely clear that should any alterations be proposed to the testing, surveillance and control regimes for bovine TB in non-farmed non-bovines in zoos, exotic companion animals, or companion animals generally that we would expect there to be a completely separate consultation on this issue with the appropriate stakeholders.

Question 10: Do you have further information/evidence that can help inform the development of any/all of these veterinary risk assessments?

29. We are aware that several of our species specialist divisions have made submission to this consultation, which go into some detail on the veterinary risk assessments and as relevant species experts we support their views.

30. With regards to deer, the Veterinary Deer Society believes that veterinary risk assessments would improve primarily with the development and adoption of an improved live animal test, especially when deer are moved from high risk areas to low risk areas.