Introduction and background

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 16,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. 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 have previously stated the need for a comprehensive approach to effectively tackle bovine TB, and our position states that successful 'control measures in cattle must be accompanied by simultaneous and co-ordinated measures in badgers and other wildlife and susceptible farmed species including deer and camelids...'

3. In producing this consultation response, we have consulted with the Pig Veterinary Society (PVS), Sheep Veterinary Society (SVS), Veterinary Deer Society (VDS), British Veterinary Zoological Society (BVZS) and British Cattle Veterinary Association (BCVA) and we are also aware of the British Goat Association's response.

4. BVA and BVZS wish to emphasise that whilst this consultation is appropriate for "farmed non-bovines" in these species groups it may not be appropriate for "pets", which may be found in some of these groups. However, BVZS believe that tighter definition is 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; safety of personnel. BVZS wish to reiterate our desire for and willingness to cooperate with a specific consultation on TB measures in zoo animals, and would ask that the response to this consultation clearly defines the relevant populations as not including those in zoos.

5. BVA and VDS wish to emphasise that 'captive deer' would realistically only mean 'red deer' and this should be made clear.

Q1. Do you agree that we should apply the duty to report suspicion of TB in live bovine animals to all non-bovine species?

6. BVA supports the extension of the statutory duty to report suspicion of bovine TB infection 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. We concur that this approach would bring the arrangements for non-bovine animals in line with those for cattle and would reflect the RCVS Code of Professional Conduct.

7. We consider that it would need to be made clear at which point such a report should be made, particularly given the non-specific clinical signs of TB in non-bovines such as goats.
It would also 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.

We note that there are significant limitations of ante-mortem tests in these species, particularly with respect to validation in non-bovine species. We would urge strongly that if “required tests” are to be specified for individual species groups, that the validation data for these tests in these species is available on an Open Access basis, and beyond reasonable scientific challenge, particularly if there is a likelihood such a test may be applied to individual “pet” species, or to non-domestic populations of suids, ovines, caprines, deer and camelids of particular conservation significance.

8. Furthermore, we would like to express concern that the reduced access to post-mortem services in England, may result in many potentially infected non-bovine farmed animals being sent for local disposal with no examination.

Q2. Do you agree that we should apply to all non-bovine species the duty on veterinary inspectors to carry out a veterinary inquiry where he or she has reason to believe that there is on any premises a live non-bovine animal or carcase affected by, or suspected of being affected by, TB?

9. We support the proposal that there should be a duty on veterinary inspectors to carry out a veterinary inquiry where they have reason to suspect a non-bovine animal(s) or carcase is affected by TB. This arrangement would again reflect those already in place for controlling TB in cattle. A risk assessment may be used to inform the need for restrictions to be applied until testing is complete.

Q3 Do you agree that we should apply to all non-bovine species the powers that require a keeper to have any animal tested for tuberculosis with a relevant test by a specified date?

10. We agree that powers should be available to have any animal tested (by a specified date) for TB, using a relevant test (ie unequivocally and publicly validated in specific non-domestic species, as discussed above). For example, the assumption that test validation in one deer species is applicable to another is inappropriate. In the deer sector there has been work on the validation of an ELISA following priming through the SICCT and the VDS would wish to see this explored further as it is being established in the near future at the Moredun Research Institute. Using the severe interpretation of the SICCT may mean that if this test is used alone, deer herds may never escape from restrictions.

11. A clear and consistent policy for dealing with any suspected outbreak of TB will need to be in place upon implementation of any new rules, which is cognisant of the practicalities of large herd testing.

Q4. Do you agree that government mandated testing of captive deer should be funded by Government, in line with the arrangements for other non-bovine species?

12. We agree that it would be sensible to standardise funding for TB testing for all non-bovine species. However, this needs to be tightly species and context-specific, and considerations would differ between a population of farmed deer of a similar species, and a naturalistic zoo exhibit in which deer, non-domestic sheep or possibly camelid species might be mixed. Therefore, we reiterate the need for specific exclusion /recognition of “non-farmed” or “zoo-captive” species from the final regulations.
13. 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. Defra would need to take into account that the handling and testing of deer at certain times of year poses particular challenges with regards their safety, health and welfare.

Q5. Do you agree we should apply to all non-bovine species the prohibitions and consent requirements relating to testing, treatment and vaccination that currently apply to bovines?

14. We support this proposal in principle. The existing arrangements for keeping APHA informed and APHA being responsible for coordinating TB testing, vaccination and treatment, should apply to non-bovine animals. It is essential to recognise that there may be different species specific considerations and there should be a clear aim to establish a mutually agreeable testing protocol for relevant species as, in relation to red deer, the testing requirements seem to lag behind those of other countries in Europe and New Zealand. There should be scope for producers to use validated alternative tests to facilitate TB assurance schemes. A clear statement about the desirability or otherwise of movement restrictions during the treatment period should be made.

15. BVA notes that PVS do not agree with this proposal with regard to testing on the assumption that it refers to testing of live pigs not under restriction.

Q6 Do you agree that we should apply to all non-bovine species powers that enable an inspector to require the isolation of specific animals and prohibit the movement of some or all animals on to or off of premises, except under licence?

16. We agree with the proposal to extend the existing powers (relating to bovids, deer and camelids) to restrict movement or require isolation of pigs, sheep and goats. This will ensure that there is a clear and consistent procedure to follow if TB is confirmed or suspected.

Q7. Do you agree we should apply to all non-bovine species the powers for a veterinary inspector to require steps to be taken by the operators of markets, shows etc. to manage the risks posed by animals affected by, or exposed to, TB and, if necessary, remove specified animals from such premises?

17. We agree with the proposal to extend the existing powers (relating to bovines, deer and camelids) to restrict movement or require isolation of pigs, sheep and goats at a market or show. This will ensure that there is a management procedure to follow if TB is confirmed or suspected and will make the rules clearer and more consistent for all concerned (keepers, market or show operators, veterinary practices, local authorities and APHA). BVA notes that consideration should be given to the risk posed by dead end hosts as restrictions may jeopardise exports from abattoirs and cause practical problems for the movement of finished animals (eg pigs).

18. Show societies may require guidance as to the disease risks, such as moving animals between areas with different levels of TB risk.

Q8. Do you agree the proposed compensation rates in the Annex are appropriate?
19. 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.

20. BVA notes that the proposed compensation rates apply to a farmed scenario in which the economic considerations can be in some measure quantified. This is largely irrelevant to the zoo sector where there may be no feasible replacement value for animals. Therefore, again, this response should highlight the group affected as being “farmed non-bovines” and/or make specific provision for zoos following a distinct consultation.

21. BVA’s position statement on compensation for compulsorily slaughtered food producing animals, states:

’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.

Compensation provides reimbursement for losses suffered by the animal keeper and as such compensation should be equitable and reflect the market value of the animal slaughtered. 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.

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.)

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 outwith their control’.

22. We note that the Goat Veterinary Society has concerns that the value of goats (and ability to purchase replacement animals) varies between different sectors, such as the meat, dairy, showing and cashmere sectors. Therefore, Defra may wish to engage with the various sectors to agree suitable compensation rates.