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.

BVA is grateful for the opportunity to respond to this consultation, which we have formulated with input from our Policy Committee and specialist divisions, including British Cattle Veterinary Association (BCVA), the British Veterinary Zoological Society (BVZS), and the Association of Government Veterinarians (AGV). 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.

Part B: Enhancing TB control measures through more sensitive testing of cattle from TB breakdown herds

The proposal for wider use of interferon-gamma testing in TB breakdown herds in the HRA.

3. BVA believes that a proposal to introduce compulsory interferon gamma testing in a structured manner would enable more thorough identification and removal of infected animals from breakdown herds.

4. The proposal stipulates that compulsory testing would take place in the HRA when one of three criteria are met. Criterion 1 and 2 seem reasonable. However, BVA shares British Cattle Veterinary Association (BCVA)’s concerns that 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. This criterion may be more safely applied where there has been a demonstrable reduction in badger numbers due to licensed badger population control activity.

5. With regard to criterion 3, BVA supports the concerns of BCVA with regard to the use of compulsory testing where only criterion 3 is applied. 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, therefore criterion 1 or 2 should also apply before compulsory testing takes place. We also suggest that definition of what constitutes clear evidence is supplied.
6. When comparing the two diagnostics, BVA believe it would be useful for clarity regarding disagreement between tests. Specifically, as the G-IFN test detects earlier stage infections but also might raise the proportion of false positives. Furthermore, clearer explanation to vets regarding where G-IFN testing is used and why may improve policy awareness along the edge area.

The proposal to use the severe interpretation of the test for all spread tracings from TB breakdown herds to reduce the possibility of missing infected animals.

7. BVA broadly supports the proposal to use the severe interpretation of the test for all spread tracings from TB breakdown herds. However, we note and support BCVA’s concerns about the application of such testing in practice. In order to alleviate some of those concerns it may be necessary to place a herd under restriction once a test starts until the test has been completed.

The proposal that all inconclusive reactors in the HRA and Edge Areas (and in TB breakdown herds in the LRA) that have a negative result on re-testing remain restricted for the rest of their life to the holding in which they were identified. The only permitted off movements for such animals would be to slaughter (either directly or via an Approved Finishing Unit).

8. BVA agrees with this proposal to reduce the risk presented by movements of cattle with undisclosed infection. BVA understands that controls currently applied to Welsh IRs risk creating difficult scenarios and it may be beneficial to standardise the approach to IRs.

9. BVA supports BCVA’s suggestion that a mechanism is provided to release IRs from restriction either by passing a gamma test, a skin test interpreted to export standard or a specified number of skin tests. In addition to this, BVA supports BCVA’s suggestion for DNA tagging IRs. With regard to lost tags, the number of which may increase due to increased longevity of the IRs, there is the potential for confusion occurring when they are replaced. The risk of this occurring could be reduced by the work being undertaken by an Official Veterinarian.

The proposal to only allow movements of cattle between two TB-restricted holdings where the destination herd is due to have at least two Short Interval Tests at severe interpretation. That would mean that the moved cattle would be required to undergo those two skin tests at severe interpretation, the first of which should not take place until at least 60 days from the date of the arrival of the cattle from the TB restricted herd of origin. This proposal would not address the small risk described in paragraph 8.5 above on the basis that imposing further controls on the herd of origin would be dis-proportionate.

10. BVA supports BCVA’s concerns that these changes may be disproportionate to disease risk and raises the following issues in practice:
   - Testing 60 days from the date of arrival may not fit into the SIT pattern for the destination herd, resulting in a part test situation until all animals test clear.
Animals may get tested at a SIT in error. A potential solution to these issues is to delay the SIT until tracing tests are due.

The proposal that when reactors are identified in a TB breakdown herd, the next SIT should take place at least 60 days after removal (rather than detection) of all of those reactors.

11. BVA broadly supports this proposal although we support BCVA’s concerns that this proposal may cause difficulty scheduling tests with farmers due to uncertainty around removal times and animals kept under exceptional circumstance.

12. BVA supports BCVA’s suggestion for a set minimum period of 75 days, which allows 60 days post detection + 10 working days for removal with exceptions to allow for holiday periods. This will greatly facilitate test arrangements for OVs and farmers. It will also lengthen the inter-testing interval which may be desirable and fit into other future proposed changes for other reasons. If a 90 day SIT interval becomes standard within the HRA then this will be largely irrelevant.

Part C: Making faster progress towards official TB freedom for the Edge Area counties of England

The proposal that the five counties currently split between the Edge Area and HRA should in future fall wholly in the Edge Area.

13. BVA welcomes the aim to achieve OTF status for counties within the Edge area ahead of the 2038 target date for achieving national OTF status. BVA supports the proposal that all counties currently split between the Edge Area and HRA should in future fall wholly in the Edge Area, with the associated benefits of increased surveillance and testing options.

The proposal to extend 6 monthly surveillance testing (and radial testing) to additional parts of the Edge Area by mid-2017.

14. BVA supports this proposal on the basis that the cost-benefit analysis would provide a net benefit overall under the assumption that testing would revert to annual testing after five years. It may be useful to ensure that vets and the public are aware that measures to control bovine tuberculosis in the Edge area are not uniform and may vary from county to county.

Part D: A call for views on other possible measures

Views on whether introduction of Veterinary Requirement Notices (VRNs) in England is something that Defra work up further with a view to full consultation thereafter.

15. We support the principle of VRNs being used more widely to improve standards of husbandry and biosecurity on farms in relation to TB. The role of the vet is crucial in advising farmers and promoting best practice in biosecurity.
We suggest that guidance on biosecurity standards should be developed 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. However, we note and support BCVA’s concerns that measures must be of demonstrable value and provide a positive cost-benefit outcome. The imposition of management procedures with no proven benefit should not be a benchmark for compensation payments.

Views on whether we should limit TB red markets in future to the HRA and Edge Area of England only.

16. BVA supports this proposal, which we believe would have a very limited impact on the industry and would provide further important support to the OTF status application for the LRA.

Views on opportunities to further enhance ibTB:
- What additional information might you want to see on ibTB?
- Should ibTB be extended to other cattle diseases?

17. BVA is content with the information that is currently available on ibTB. Extension of ibTB to other cattle diseases may be useful for information and risk assessment, especially in light of the Government’s commitment to tackle antibiotic resistance. However, it should not be considered until such a point that the data related to other diseases is robust enough and in the short term would risk dilution of the bTB focus. This would be of less benefit to the non-bovine stakeholders who need to be incentivised to participate fully in bTB control.

18. BVZS considers the most useful development would be the extension of the ibTB tool to include all breakdowns of bovine TB in non-bovine species (e.g. camelids) into the mapping tool. This would be of more immediate specific benefit to bTB control, and likely be more straightforward to implement rapidly and effectively.