BVA Northern Ireland Branch response to the Interim Report Consultation by the TB Strategic Partnership Group

Background & Introduction

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. BVA’s Northern Ireland Branch brings together representatives of local veterinary associations, BVA’s specialist divisions, government, and research organisations in Northern Ireland. The Branch advises BVA on the consensus view of the Northern Ireland members on local and United Kingdom issues.

3. BVA is pleased to have been invited to contribute to this consultation. We are liaising with the British Cattle Veterinary Association (BCVA), one of our specialist divisions, who are also submitting a response. The eradication of bovine tuberculosis (bTB) presents a significant challenge due to the complexity of the disease and the large number of factors involved in its spread. The control and eradication of bTB from cattle and other susceptible farmed species is the only way to minimise the impact on the farming industry and so reduce cost. Measures taken to achieve eradication must be based on the application of both sound scientific research and veterinary epidemiology. Intervention measures in farmed species must be accompanied by simultaneous and coordinated measures in badgers and other wildlife for the success of the eradication programme.

Culture and communication

4. We consider the main barriers to bTB eradication facing all stakeholders to be the decreasing amount of animal health expenditure, the challenge of addressing bTB in Northern Ireland (NI) within the epidemiological unit of the island of Ireland, and the need to address the disease in both farmed species and known wildlife reservoirs of bTB. A further barrier may be acceptance of and resignation to an endemic disease situation and control strategy with which stakeholders are not fully engaged.

5. We fully support the development of a local partnership approach involving farmers, vets, Department for Agriculture and Rural Development (DARD) officers and other appropriate stakeholders (e.g. hauliers, auctioneers and environmentalists) as a strategy to develop constructive engagement and ensure that bTB strategy is unified and appropriate to the local area.

6. In the recent Welsh Government consultation, we have suggested that information on the location of bTB breakdown herds should be shared both in list and map format. However, we would stress the need to ensure all farmers are fully aware of such a proposal before their implementation and urge caution that no personal information about the farm or the farmer is divulged.

7. We believe the local veterinary surgeon has an integral role in providing timely and appropriate bTB risk mitigation, sound biosecurity advice, and support to the wider
bTB programme. It is important that degradation of veterinary infrastructure should be avoided and instead existing local relationships and knowledge should be exploited. BVA has previously expressed concern about diminished local veterinary contact on surveillance, control programmes and cattle welfare. We understand that veterinary surgeons are well placed to relay DARD information to farmers and we would support strong veterinary involvement within all of the options discussed in Chapter 4 Governance and Delivery.

8. We think a publicity campaign aimed at all stakeholders (including vets) and time spent as part of the bTB testing programme talking farmers through best-practice could result in better engagement, awareness and a proactive culture around bTB eradication. Straightforward, educated communication from veterinary service briefed private veterinary practitioners (PVPs) to farmers has been anecdotally effective in the Test, Vaccinate, Release (TWR) areas. This approach would be facilitated by development of a programme in conjunction with stakeholders to foster a sense of ownership.

Governance and delivery

9. BVA, in conjunction with BCVA, have supported a joint initiative by the farming industry and the veterinary profession to lobby the government on the best approach to bTB and other cattle diseases in England. The initiative, similar to the New Zealand board, will include:
   - the creation of a TB Eradication Board for England, comprising suitably qualified representatives from the farming industry, the veterinary profession and government, charged with strategic leadership, communication, technical capability and oversight of delivery, reporting directly to the Secretary of State
   - a nationwide TB Advisory Service as part of the Rural Development Programme, giving advice and training to farmers on how to deal with consequences of the disease, or help them remain disease free

10. We acknowledge that with an increased level of industry involvement at strategic level there are grounds to share cost and responsibility with government. However, we would reiterate that shifting the responsibility of who pays for disease control or surveillance will not achieve the long term goal of bTB eradication on its own. Furthermore, it would be unacceptable for costs to be shared if the agreed strategy did not address all reservoirs of disease.

Existing tools and processes

11. BVA supports a review of the use of the Interferon Gamma (IFNG) test to explore test combination protocols offering maximum benefit with acceptable cost/benefit ratios. In the interim we support strategic use of the IFNG test; the benefit of using the IFNG test in herds in high prevalence areas is questionable. 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.

12. We support the introduction of the DNA tagging of positive reactors by the veterinary surgeon reading the test results at TT2, to reduce the risk of inadvertent or deliberate substitution as part of the comprehensive bTB strategy.
13. Our position on bTB testing in NI is that it should be carried out by veterinary surgeons wherever possible in order to maintain the extensive export market that NI enjoys successfully. However, there may be a role for lay bTB testers as part of a veterinary-led team under veterinary direction. How and whether that role is utilised should be a matter of choice for practices and would be based on individual circumstances and business plans. All lay bTB testers must be appropriately trained, regulated, and subject to standards of quality assurance, which are all functions that we believe should remain the responsibility of veterinary surgeons.

14. We support the designation of herds on the basis of risk to facilitate the decision making process those buying and selling cattle (risk-based trading). Risk-based trading can only work if measures are put in place such as greater targeting of surveillance or links to compensation, to underpin the process and mitigate the risks taken by farmers. BVA has previously proposed that the CHeCS Johnes module is an excellent example for assigning a risk-rating or disease status in a herd. Communication of information on risk-based trading to those purchasing cattle, including how to improve their risk rating (e.g. through the adoption of good biosecurity practices or post-movement testing) should be covered in the best practice buyer and seller guidelines, alongside discussions with their local, veterinary service briefed private veterinary practitioner.

15. We support the proposal to introduce a system of pre-movement testing as a logical disease control measure. However, we suggest a cost-benefit analysis be undertaken for different groups of cattle that may be affected by the proposal (e.g. those under 6 weeks or in very low risk areas).

16. BVA agree that the agricultural industry should pay for pre-movement testing. However, similar to animals kept on common land in England, animal movements to and from conacre land may require special consideration due to the increased likelihood that it is insecure and poses an increased risk. If animals cannot be tested on conacre land there may be necessity to keep them in isolation at their holding of origin for a post-movement test at the earliest opportunity.

17. We support the inspection of animal testing being carried out to international inspection standards and believe there is a high value in ensuring that testing is carried out to the highest possible levels.

**Wildlife**

18. In order to reduce the reservoir of bTB infected badgers and thus prevent exchange of bTB between cattle and badger populations we support the tried and tested methodology of culling badgers using cage trapping and shooting based on evidence from the RBCT. A wider roll-out of culling should take place using cage trapping and shooting only, to carefully selected areas where badgers are regarded as a significant contributor to the high incidence of bTB in cattle. Vaccination could be carried out alongside a targeted cull in carefully selected areas.

19. We continue to support research that seeks to reduce the number of infected badgers in the environment and welcome the test, vaccinate or remove (TVR) wildlife intervention research project. However, we remain concerned about the lack of sensitivity of the trapside diagnostic tests currently available for evaluating the status of the badger, the risk of perturbation of the badger population and the need to
manage stakeholder expectations. Nonetheless, we hope the TVR project will provide information which can inform bTB policy across the UK, in particular by helping us better understand field-based diagnostics in badgers and how their correct deployment can contribute to a comprehensive bovine TB control programme.

20. Our strong support for research into alternative humane sett-based culling methods and non-lethal methods of population control (such as contraceptives) continues and we urge ongoing review and support of the current research programme.

**Vaccination**

21. We consider that should badger vaccination be included in the NI bTB strategy it should take place alongside a targeted cull and only in carefully selected areas. It is unlikely to be a useful resource in areas with a high prevalence of infection.

22. BVA believes that in the long term, vaccination of both badgers and cattle can and should play a role as part of a comprehensive bTB eradication strategy. In England we have supported deployment of the existing injectable badger vaccine at the edge of endemic bTB areas to mitigate the spread of the disease into low risk areas and would support this approach in NI. As with the TVR project, we remain concerned about the risk of perturbation of the badger population with this approach.

**Farm practice and biosecurity**

23. Improving on-farm biosecurity is essential to the bTB eradication strategy and we think it is important that provision and implementation of advice is as evidence-based as possible. We note that AFBI are working on a DARD-funded study investigating herd-owner understanding of and attitudes toward biosecurity principles. We would support further research in this area and recommend the results are incorporated into enhanced guidance for farmers. BVA would urge that PVPs are provided with the latest advice and training in relation to biosecurity because they will be in the best position to advise farmers.

24. We support the proposal to share information on bTB infected herds in NI, which would facilitate the introduction of risk-based precautionary measures, such as improvements to biosecurity, thereby helping to prevent the introduction of bTB. The highest priority biosecurity measures include preventing contact between cattle on neighbouring farms, protecting cattle feed and feed stores from wildlife, pre-movement testing, and risk-based trading practices. As reactors will occur in cattle grazing away from the main holding, consideration should also be given to publishing the location of the grazing ground.

25. We believe that herds under restriction should be identified although care should be taken to ensure that no personal information about the farm or farmer is divulged. Data regarding breakdowns should be available for a period of five years as knowledge of how long a herd has been free from bTB would be useful when making purchasing decisions as the risk of a herd suffering a further breakdown decreases with time.

26. BVA support the use of improvement notices and we understand the Welsh Government has already adopted the principle of reducing compensation should farmers continue with unacceptable high-risk practices or if they fail to adopt recommendations within ‘improvement notices’. Where these have been used,
farmers have complied such that there has been no reduced compensation as a consequence of non-compliance.

27. We support the use of longer-term leases for conacre land with the aim of reducing the number of cattle movements.

Research and policy development

28. BVA would urge DARD to continue to support bTB research and ensure it is adaptable to changing circumstances. Research into the best use of current diagnostics, development of new diagnostics, and further development and deployment of vaccines for the control of bTB in both cattle and badgers is of the utmost importance. We also support investigations into alternative sett-based humane culling methods, non-lethal methods of population control (contraceptives), PCR technology, sett-side diagnostics and research into selection of cattle for genetic resistance to bTB.

Funding TB eradication

29. BVA believes that if an animal or group of animals is compulsorily slaughtered for the purposes of disease control, compensation should be paid. 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.

30. We support the principle of a reduction in compensation where there is lack of compliance on the part of the keeper with statutory bio-security guidance (e.g. appropriate handling of animal by-products, pre-movement testing, isolation of reactors etc.) However, in some circumstances failure to comply with statutory bio-security guidance may be unavoidable. An appeals process must be in place to protect those keepers whose lack of compliance is as a result of circumstances out with their control.

31. We take the view that where there is a demonstrable link with the risk of disease spread we support the use of compensation to reward risk reduction and to penalise risky practices in relation to compliance with statutory obligations, or in time, association with best practice on evidence-based biosecurity. We understand the Welsh Government has already adopted the principle of reducing compensation should farmers continue with unacceptable high-risk practices or if they fail to adopt recommendations within ‘improvement notices’ with a degree of success.

32. Farmers must meet their responsibility to take measures to prevent the spread of infection and be prepared to share some of the industry costs with respect to bTB control and eradication. The introduction of pre-movement testing in England has been borne largely by the farming industry, but the imposition of additional financial costs on the farming industry without the application of improved bTB control measures in wildlife, in particular the badger population, is counterproductive to industry acceptance of responsibility of cost-sharing alongside the government. Irrespective of an alternative funding model the fact remains that the only way the cost of bTB control will decrease is with decreased incidence of disease.

33. We believe that a decision regarding payment for one annual herd test, which may increase the sense of ownership of the bTB strategy, is something that a future NI industry-government board may wish to consider.