



Department
for Environment
Food & Rural Affairs

www.gov.uk/defra

Draft Strategy for achieving ‘Officially bovine Tuberculosis-Free’ Status for England

Summary of Responses

April 2014

© Crown copyright 2014

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit www.nationalarchives.gov.uk/doc/open-government-licence/ or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or e-mail: psi@nationalarchives.gsi.gov.uk

This document/publication is also available on our website at:

www.gov.uk/defra

Any enquiries regarding this document/publication should be sent to us at:

E-mail: bTBengage@defra.gsi.gov.uk

Post:

TB Strategy Consultation

Defra

Area 5D, Nobel House

17 Smith Square

London

SW1P 3JR

PB 14077

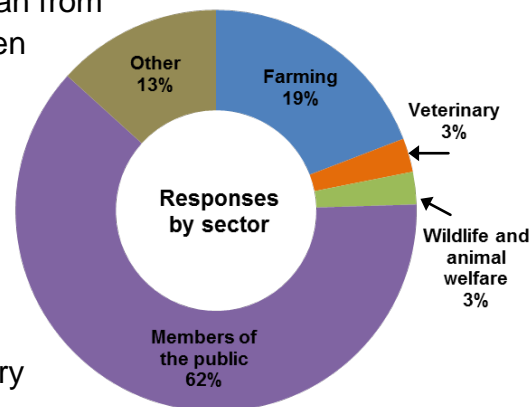
Contents

Introduction	1
Background.....	1
Raising awareness of the consultation	2
Handling responses	3
Overview of responses	3
Broad issues raised.....	3
Cattle industry issues raised	3
Veterinary views raised	5
Public / other interest views raised	5
Responses to specific questions.....	6
Aim of the draft Strategy	7
Q1. Do you agree with the stated aim?	7
Drawing from the experiences of others	8
Q2. Are you aware of any other examples of approaches to tackling bTB that you think could help inform the policy?	8
Q3. Should any of the examples that have been included in the draft Strategy be disregarded?	9
Core aspects of the draft Strategy's approach.....	9
Q4. Do you agree with the draft Strategy's overall approach?	9
Developing a "risk-based approach"	11
Q5. Do you agree in principle with the "risk-based approach" proposed under the draft Strategy i.e. that a sub-strategy is developed and implemented for the High Risk Area, Low Risk Area and Edge area; that the sub-strategies are tailored to the situation in each area and work together to achieve the draft Strategy's aim?.....	11
Q6. Do you agree with the objectives for each draft sub-strategy (e.g. the objectives for each of the High Risk Area, Low Risk Area and Edge area)?	12
Q7. Do you agree with the proposed package of measures for each risk area and proposed cross cutting measures that will apply everywhere?.....	13

Developing new tools.....	15
Q8. To what extent do you agree with our proposals for developing new tools?.....	15
Responsibility for policy and oversight.....	16
Q9. To what extent do you agree or disagree with the statements below?	16
Q10. How do you foresee governance (e.g. policy responsibility and oversight) arrangements for bTB changing?.....	18
Delivery arrangements.....	20
Q11. To what extent do you agree that – in principle – the current delivery arrangements for bTB should be reviewed and alternatives considered?	20
Q12. To what extent do you agree that the specific areas of delivery identified in the draft Strategy should be reviewed?	21
Funding.....	23
Q13. Do you agree that a more sustainable funding model should be taken forward under the Strategy?	23
Q14. Do you think the following potential funding options should be explored further?	23
Q15. Should any other funding-related options be explored?	25
Monitoring and evaluation.....	25
Q16. Do you agree with the proposed approach to monitoring and evaluation?	25
Other comments	26
Stakeholder engagement workshops: Defra Citizen Dialogue on bovine TB.....	27
Public workshops and online public engagement: Defra Citizen Dialogue on bovine TB	27
Next steps.....	28
Annex A: List of organisations who responded to the consultation	29

Introduction

1. This document provides a summary of responses to Defra's public consultation exercise on a draft Strategy for achieving "Officially Bovine Tuberculosis-Free (OTF) Status" for England within 25 years. The consultation ran from 4 July to 26 September 2013. Defra received 918 written or online responses to the consultation, of which 62% were from members of the public, 19% were from farmers or farming organisations, 3% were from vets or veterinary organisations, 3% were from wildlife or welfare organisations and 13% were from other interests.
2. The aim of this document is to provide a broad summary of the responses received.



Background

3. Bovine tuberculosis (bTB) is one of the most significant problems affecting animal health and sustainable farming in England. It is a chronic infectious disease of cattle and can present a risk to human health to those who are in close contact with infected animals or people who drink unpasteurised milk.
4. The draft Strategy sets out how the Government envisages tackling the disease. The ambition is to make steady progress toward achieving OTF status for England. This will take time. As progress is made, the Government hopes to be able to gain OTF Status for individual counties - or groups of counties - as early as practicable.
5. "OTF Status" is defined in European Union (EU) law. For a region to be considered to have OTF status at least 99.9% of the herds within it must have remained officially free from bTB for at least six consecutive years.
6. Achieving OTF status for England will require a joined-up and thorough approach. The draft Strategy emphasises the need for a comprehensive, risk-based and staged approach that encourages partnership working, establishes a fair balance of costs and responsibility, and adequately supports farmers.
7. In refining what a better risk-based approach will look like, the draft Strategy defines three geographical areas of England on the basis of bTB risk. These are called the Low Risk Area (LRA), the High Risk Area (HRA) and the Edge Area. The latter represents the boundary between the Low and High Risk Areas. Each area has a sub-strategy tailored to it. Each of these includes its own objectives that support the Strategy's overarching aim, and each has a set of measures to deliver the objectives.

8. The draft Strategy acknowledges the need to fill gaps in understanding about bTB and its spread. It considers ongoing work to develop new tools to combat the disease such as diagnostic tests, vaccination and badger population control methods.
9. The draft Strategy considers options for governance, delivery and funding, and whether alternative and innovative approaches can support progress toward achieving OTF status for England.

Raising awareness of the consultation

10. The consultation exercise sought to engage all those with an interest in the policy on bTB. The Government was particularly interested to hear views from those who could be directly affected by the proposals.
11. Whilst it would be impossible to reach directly all individuals who have an interest, Defra took steps to raise awareness of the consultation launch as far as practicable. This included alerting by email around 250 stakeholders considered to have cattle sector farming and welfare interests or those registered on Defra's distribution lists; and placing articles/notifications in relevant media (e.g. the Defra website, coverage in the farming and national press; coverage on social media). The high profile campaigns run by wildlife groups opposed to the pilot badger culls in Somerset and Gloucestershire in summer/autumn 2013 also served to raise awareness and the level of responses received indicates a high level of stakeholder coverage and interest. In addition, Defra organised and participated in stakeholder engagement events to raise awareness of the Strategy and obtain views:
 - Defra and AHVLA hosted three launch events at Exeter, Bakewell and Carlisle livestock markets on 12, 15 and 29 July 2013 respectively
 - Defra hosted a science workshop for wildlife and animal welfare non-government organisations (NGOs) on 22 July 2013.
 - Defra and AHVLA officials and Animal Health and Welfare Board for England (AHWBE) and TB Eradication Advisory Group (TBEAG) members addressed various stakeholder meetings including local NFU meetings and local bTB Eradication Board meetings in Cheshire, Derbyshire and Cumbria.
 - Defra and AHVLA supported ten independently facilitated stakeholder workshops in Devon, Dorset, Worcestershire, East Sussex, Oxfordshire, Leicestershire, Staffordshire, Norfolk, Cumbria, North Yorkshire between 3 - 19 September 2013 as

part of a Citizen Dialogue project (SE3049) co-funded by Defra and Sciencewise-ERC¹.

Handling responses

12. The consultation closed on 26 September 2013, although a small number of late responses received were also considered. Around 100 responses came in within the first week of the consultation and around 500 responses were received in the final two-weeks. Around 75% of online responses were received after the badger culling pilots in Somerset and Gloucestershire had started.
13. The following analysis reflects only the views of individuals and organisations that responded to the consultation or participated in stakeholder engagement events.

Overview of responses

Broad issues raised

14. The broad issues raised by a number of stakeholders are described below. The list is not intended to be exhaustive nor in any particular order and the absence of a particular issue does not indicate that it has been ignored or that it is of lesser importance. All responses will be considered in taking final decisions and developing specific proposals.

Cattle industry issues raised

- There was general support received for badger culling amongst farming stakeholders who responded, including calls for area-based wildlife control plans, although some disagreed with badger culling.
- Badger culling should be rolled out and no more cattle based measures should be introduced before this happens. For many, the ability to control the wildlife vector was seen as key to the success of the Strategy, both in delivering a reduction in bTB and in farmer support.

¹ The Sciencewise Expert Resource Centre (Sciencewise-ERC) is funded by the Department for Business, Innovation and Skills (www.sciencewise-erc.org.uk). More details on the Defra Citizen Dialogue project (SE3049) are here <http://randd.defra.gov.uk/>.

- There were many references to the ‘countryman way’ which was cited as an alternative approach to local identification and removal of badgers infected with bTB. There were calls for reactive badger culling in some areas.
- The control framework needs to allow farmers to operate profitably.
- Farmers should not bear the costs or more costs because the government has failed to control the disease and pressures on farm incomes, although there was some support for greater cost-sharing if farmers could control badgers and / or once the disease is under control. There was qualified support for new levies (‘disease levy’) which should have supply chain and retail contribution, and some support for diverting some of the existing Agriculture and Horticulture Development Board (AHDB) levy funds towards bTB disease control.
- Other parts of the food chain should also contribute towards cost-sharing, or we could look use Pillar 2 subsidy payments (money from the Common Agricultural Policy (CAP) that funds rural development programmes).
- There was little support for insurance but some for a mutual fund.
- A 25 year timeframe is too long. Some suggested that we should be aiming for 4-5 years
- There were issues highlighted about the skin test, including some confusion around the disease status of non-lesioned, test-positive cattle. There were often misconceptions from farmer respondents, as well as other groups.
- Some support was expressed for providing more information on the location of TB breakdowns and mapping disease prevalence in wildlife.
- Some support was indicated for making risk-based trading mandatory. There was strong support for a national database collating information on cattle movements and risk ratings including herd health status.
- On risk generally: many responses indicated either an unwillingness to take on responsibility for bTB risk management in their business, feeling that either Government should take on full responsibility because bTB is a notifiable disease, or because of the perception that Government has caused the rise in disease levels through inaction.
- On governance, there were mixed responses. Many thought farmers should have more say (especially if they were to pay more) and many that the industry should be left to get on with it. There was general support for greater vet involvement. Some argued though that Government should still retain overall control.
- There were mixed responses about the use of lay testers – many want to retain the relationship that exists with their vets.

- There was some support for looking at salvage contracts to get better rates but concern about wholesale changes to the system.
- Some issues were noted about risk areas – the possible impact on trade (creating two-tier markets) or that some pockets within areas are a different risk but that this won't be recognised. Some thought that the whole of England should be an HRA.
- There were calls for compulsory identification and control of non-bovine species, particularly camelids.

Veterinary views raised

- Veterinary stakeholders, who responded, said that there was a need to address cattle movements – there were too many of them at present.
- Better biosecurity is needed.
- Veterinary stakeholders who responded mostly support badger culling but some think it is not scientifically based and that other species also need to be looked at.
- There is a need to look at less intensive / alternative farming practices.
- There were some negative comments about the move to alternative vet contracts, although support for greater involvement of vets in breakdown management / prevention.
- Some support for greater auditing of bTB testing was highlighted.
- There is a need for better monitoring of testing to build a better epidemiological picture.

Public / other interest views raised

- Comments showed that members of the public, who responded, opposed badger culling and wanted to see cattle and badger vaccination. There are lots of volunteers to help carry out badger vaccination.
- Many people could support the strategy as a whole, with the exception of badger culling.
- Many people did not want to see comparisons made with other countries, as the disease situations and wildlife vectors are different (e.g. New Zealand was not dealing with an indigenous wildlife vector in possums), and control programs are different (exports, cost burdens). Often, this was juxtaposed with the call to look at other countries such as Wales, Scotland and Northern Ireland.

- There is a need to challenge the EU on timescales for cattle bTB vaccine development.
- Many felt that biosecurity standards needed to be improved on farms and that 100% compensation provided disincentives to improvements. Some calls for better enforcement of biosecurity standards.
- Many were against intensive farming practices and blamed this for the rise in bTB.
- Protection of wildlife needs to be one of the aims of the Strategy. Some felt that ecological and environmental frameworks were missing from the Strategy.
- Farmers should pay more (e.g. as they are already subsidised)
- NGOs or wildlife organisations should be better funded to carry out badger vaccination. Government should coordinate this on a national scale as well as pay for it.
- There were some misconceptions – e.g. that the ‘test, vaccinate, remove’ (TVR) approach for badger control was already in place in Northern Ireland. There were also misconceptions about disease transmission.
- Risk based trading should be compulsory. There are too many cattle movements.
- On governance – many thought that Government should not be involved in bTB eradication given its position on badger culling and belief that government is too close to industry. The National Farmers Union (NFU) is seen as having too much of a vested financial interest. Many believed that wildlife groups should be more / exclusively responsible for the eradication strategy, or that a more science-led body, more independent of government should be set up.
- The quality of testing needs to be improved / better audited.
- Some commented that there are some disease issues that are more important than bTB, so we should be looking at that as a higher priority, especially if there is no significant human health risk.
- There was criticism of the lack of monitoring for the pilot badger culls.
- Some points around better genetics / use of DNA testing were raised.

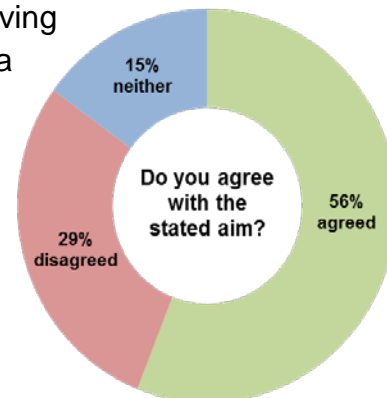
Responses to specific questions

15. The responses to the consultation were assessed on the basis of the following categories of respondents – food and farming; public; veterinary surgeons; welfare and wildlife groups; and other interests. There were also a small number of respondents in the ‘undisclosed’ category.

Aim of the draft Strategy

Q1. Do you agree with the stated aim?

16. The aim of the draft Strategy was 'to eradicate bTB, achieving OTF Status for England incrementally, whilst maintaining a sustainable livestock industry.' The draft Strategy set out how the aim would be achieved through greater partnership working, increasing industry-led implementation and a fair sharing of the associated costs. The majority of respondents (56%) agreed with the aim of the draft Strategy, whilst 29% disagreed.



17. Comments from the public and those with other interests showed that they opposed badger culling; they noted that other countries such as Scotland had achieved bTB freedom without the need for culling wildlife. Some farmers also disagreed with badger culling. There was broad support for the vaccination of both badgers and cattle. Many though could support the aim if badger culling was removed from the equation, arguing that Defra had disregarded scientific advice in taking forward the culling policy and was pandering to industry in doing so. A few respondents questioned whether badgers did indeed spread bTB to cattle.

18. Many put the current problems with bTB down to the intensification of farming compared to the 1960s when the disease was almost eradicated and that meat consumption should be reduced. There were many calls for farmers to tighten their biosecurity arrangements, including restricting the numbers of cattle movements and improving compliance with existing controls. Some vets and farmers also agreed with this. There was some sympathy for farmers and the situation they find themselves in.

19. In terms of the aim itself, a number of respondents also wanted to see specific reference to the health and protection of wildlife as part of the aim and some also wanted further clarification on what was meant by 'sustainable' livestock industry. Some respondents questioned the need to eradicate either because the public health risks were minimal and that there were other more pressing animal health issues to address (e.g. mastitis), or because eradication is not truly possible.

20. Farmers supported the aim of controlling and eradicating bTB, highlighting the spread of the disease and the economic loss and emotional strain on the industry. More help and support was needed for farmers affected by the disease. Given the current economic constraints, farmers did not want to bear more of the costs and the control framework still needed the industry to be able to work profitably. There was some support for looking at other badger culling techniques.

21. There were comments from both the public and vets that other species also needed to be included in the Strategy as they are affected by bTB. Some members of the public and farmers thought that the 25 year aim was too long, and that it was important to communicate the potential for reductions in disease over shorter timescales.

Drawing from the experiences of others

Q2. Are you aware of any other examples of approaches to tackling bTB that you think could help inform the policy?

22. There were a number of approaches in other areas or countries that were cited. Members of the public and those with other interests suggested approaches taken where culling of wildlife was not used (e.g. in the Isle of Man, Switzerland, Ethiopia, Wales, Northern Ireland and the approach taken historically in England). There was mention of the eradication of trypanosomiasis in some parts of Africa. Farmers made references to other examples where culling of wildlife had provided benefits (such as France, Bath, Thornbury and Anglesey). There was also mention of using 'countryman skills' to identify infected badger setts. There were some additional suggestions from vets, including the approaches taken in the Netherlands, Mexico (using cattle vaccines) as well as Latvia, Spain and Italy.
23. A number of suggestions were put forward by the public, many of which had already been included in the draft Strategy. Other suggestions included looking at animal nutrition (for example provision of mineral licks, also suggested by farmers); making improvements in cattle housing management and reducing cattle densities; vaccination of wildlife species released back into the wild; hedgerow management to offer badger latrines away from grazing areas; removing all cattle from the Edge Area; DNA testing rather than skin testing; and lime replacement in soil to reduce iron.
24. Additional suggestions from farmers included the isolation of pre-movement tested cattle before they move off-farm; annual testing across the whole country; repealing the Protection of Badgers Act (POBA); removing all inconclusive reactors at the first test; a need for cross-party political consensus on taking the Strategy forward; and looking at the impact of maize production on bTB spread.
25. Veterinary suggestions also included looking at the 'supermarket stranglehold on retail sectors'; looking at using the caudal fold test as this was less onerous and cheaper, and using an enzyme-linked immunosorbent assay (ELISA) test.
26. There were some misconceptions. For example some members of the public thought that the 'test, vaccinate, remove' (TVR) badger control approach was

already in place in Northern Ireland, and some farmers thought that there was little evidence for cattle-to-cattle transmission.

Q3. Should any of the examples that have been included in the draft Strategy be disregarded?

27. The draft Strategy outlined examples of strategies carried out in countries where bTB eradication / free status have either been achieved or where significant progress has been achieved. These were: Australia; Scotland; Michigan in the United States of America; New Zealand; and the Republic of Ireland.
28. Again the majority of respondents (79%) said that they were aware of other examples of approaches to tackling bTB. The same percentage said that they thought that some of the examples should be excluded.
29. Members of the public and those with other interests opposed badger culling and said that citing examples of successful eradication programmes that involved culling of wildlife was not appropriate, as the wildlife vectors were different (in some cases the culled species were not indigenous) and there were differences in the wider bTB control framework (e.g. tighter movement controls). Some highlighted cultural differences in the approach to wildlife in other countries, and that paying 100% compensation encouraged poor farming practices.
30. Some farmers commented on the need to protect wildlife but many did not want to see additional cattle controls imposed before there was wider implementation of wildlife controls; the prevailing view was that this should be badger culling rather than vaccination. Some farmers approved of the risk-based area approach.

Core aspects of the draft Strategy's approach

Q4. Do you agree with the draft Strategy's overall approach?

31. The draft Strategy outlined that the overall approach will be:
 - Comprehensive, tackling *M. bovis* infection in cattle, other farmed animals and wildlife, making use of all available tools whilst funding research to address evidence gaps;
 - Risk-based, with controls targeted according to risk of infection and based on scientific and veterinary advice; and
 - Staged, to provide the means to stop the spread of infection, bring it under control, and bear down on it to achieve and maintain OTF.

32. The draft Strategy embraced:
- Supporting farmers: Government will work with those at the forefront of disease to support farm businesses in taking more responsibility for disease control
 - Partnership working: Those groups with an interest will need to collaborate effectively to deliver the Strategy's aims.
 - Fair balance of costs and supported responsibility: government will ensure that farmers have the right incentives for tackling TB and will explore innovative governance and delivery arrangements.
 - Working effectively in the EU: complying with EU legislation and pushing for a more flexible, risk-based EU legal framework.
33. The draft Strategy also set out disease outcome targets and a tentative timeline for deployment of measures until 2025.
34. Overall, 64% of respondents disagreed with the draft Strategy's overall approach, whilst 22% agreed. The figures were largely dominated by the public response, 73% of whom (399 out of 544) disagreed, as did those registered as other interests. Those registered as welfare / wildlife groups were less conclusive, with 9 of the 20 responses disagreeing with the approach and 6 in favour. Those with veterinary interests largely agreed (13 out of 19), as were those with farming interests (66 out of 127 respondents agreeing, with 45 disagreeing).
35. In agreeing in general with the overall approach and welcoming the aim of achieving OTF status, comments received from farmers also highlighted some concerns about the need to work with industry and that the cattle industry needs to remain profitable in order for the Strategy to work. Given the long timescales for achieving OTF status, the Strategy needed to de-politicise bTB control to ensure continued of the agreed policies by any future Governments. For those that disagreed, there were concerns that the risk area approach would lead to a two-tier market and stigmatise those in the HRA. Some farmers wanted to see the POBA repealed and to look at other methods of culling (e.g. gassing). There were also concerns around cost sharing; with some blaming the Government for failing to act previously and that therefore farmers should not be paying extra as a result.
36. Many vets agreed with the approach, recognising that there needed to be stricter controls on cattle and wildlife, as well as other non-bovine species. Some were concerned that previous strategies had made no real headway because proposals had either ignored key problems or had been 'politically watered down'. Some vets thought that the statements on the approach were too vague to be meaningful.
37. Members of the public and stakeholder groups opposed to the policy on badger culling thought that there should be more support for vaccination. Some thought

that all wildlife, not just badgers, should be included in the scope of the Strategy and agreed that there must be mandatory controls in place to tackle bTB, although the risk-based approach needed to be proportionate. Other comments wanted to see the term 'partnership working' made clearer, whilst another stated that paying farmers to do the right thing was not the right way forward.

Developing a “risk-based approach”

Q5. Do you agree in principle with the “risk-based approach” proposed under the draft Strategy i.e. that a sub-strategy is developed and implemented for the High Risk Area, Low Risk Area and Edge area; that the sub-strategies are tailored to the situation in each area and work together to achieve the draft Strategy’s aim?

- (i) Having sub-strategies that represent packages of measures that are tailored to the level of risk and needs of the High Risk and, Low Risk and Edge Areas**
- (ii) Identifying and applying cross-cutting measures to be applied elsewhere**

38. Since January 2013, geographical areas of England have been assigned one of three bTB risk-based classifications: Low Risk, High Risk or Edge of High Risk (“Edge”)
39. The Low Risk Area (LRA) is demarcated by the four-yearly cattle herd testing counties in the North and East of England. The annual cattle herd testing zone includes the High Risk Area (HRA) and the Edge. The aim of the draft Strategy was incrementally to extend the LRA to the whole of England and eventually to achieve OTF status.
40. The draft Strategy proposed sub-strategies for each area. Cross-cutting tools such as biosecurity, advice, compliance and enforcement would underpin the approaches. The underlying approach was common for all risk areas, i.e. prevent bTB breakdowns, detect bTB breakdowns early, and deal with bTB breakdowns rigorously. Whilst some control measures would apply across all risk areas, others would be tailored as part of individual packages.
41. Overall the percentage of those agreeing and disagreeing with having sub-strategies tailored to the different risk areas was similar (39% agreeing and 42% disagreeing). Around half of those responding as members of the public disagreed with the principle (261 out of 526 respondents, with 153 agreeing) whilst there was almost full support from veterinary surgeons (only 1 out of 19 disagreeing). Those with food and farming interests were largely in favour (84 out of 127 respondents) and around half of welfare / wildlife groups were in favour (11 of 21 respondents, with 4 disagreeing). Those with other interests were fairly balanced in terms of

agreement and disagreement. Similar trends were also apparent for the question about identifying and applying cross cutting measures.

42. Comments from members of the public showed a lack of support for badger culling, preferring instead badger and cattle vaccination. Some thought that the risk-based approach made sense, others that there were too many risk areas. Some felt that a flexible use of measures was needed within each strand, others that all options should apply in all areas. Others felt that bTB needed to be dealt with wherever it was found and that farmers in the LRA need to remain vigilant and not become complacent. There were comments that better biosecurity and farming practices were needed otherwise the measures would not work. This included reducing the numbers of cattle movements. There was some confusion as to what 'cross-cutting measures' means, whilst some thought that the options weren't detailed enough. Some additional comments from those with other interests suggested that cross-cutting measures bring benefits wider than just to bTB controls, that undetected infection was an issue that needed resolving, and that better control at markets was needed.
43. Comments from farmers included recognition of the need for good biosecurity and wanting to see more local accountability. Some felt that the testing regime is burdensome and that changes to compensation risk encouraging non-compliance. There was a suggestion that there should be post-movement testing for moves into the LRA or pre-movement testing of cattle that had spent any time in the HRA. There should be some further restrictions of movements out of the HRA, although there was recognition that, because of the structure of the industry, movements would continue from the HRA into the LRA. There were some concerns around defining risk, with some comments that all measures should apply in all areas (including annual testing) whereas others felt that risk should be classified on a parish rather than county basis, or individual animal level rather than herd level. Some felt that there should be exemptions for herds which had a long history of not having bTB or that each farm's risk could be evaluated. It was felt that Government-held data should be shared to allow informed decisions on risk.
44. Vets also echoed the need for better biosecurity and suggested that risk-based trading should be made mandatory (as did those with other interests and some farmers). Some vets noted that more vet training on bTB could be beneficial.

Q6. Do you agree with the objectives for each draft sub-strategy (e.g. the objectives for each of the High Risk Area, Low Risk Area and Edge area)?

45. The draft Strategy set out a number of high-level short, medium and long term objectives for the HRA, LRA and the Edge area. The ultimate aim of each area was to achieve OTF status. In the LRA the objective was to continue to protect the current area, whereas the intermediate objectives in the HRA and Edge Area

included reducing overall incidence rates or stopping geographical spread of disease.

46. Veterinary surgeons were very strongly in favour of the proposed objectives for each area and the majority of those with food and farming interests were in favour with the objectives (around 60%). Members of the public were largely opposed to the objectives for each area, although a greater proportion (68%) disagreed with the objectives for the HRA than for the other areas 54% and 56% for the LRA and Edge Areas respectively. Welfare and wildlife groups and those with other interests were positively in favour with the objectives for the Edge Area and LRA but disagreed with the objectives for the HRA. Overall 56% of respondents disagreed with the objectives for the HRA (most strongly disagreeing), whereas slightly less than half disagreed with the LRA and Edge Area.
47. Comments received were similar to those for the previous questions. Additional points from members of the public were that cattle moving into the LRA should be vaccinated and some questioned the stated rise in incidence in the HRA. Additional comments from those with other interests included a suspicion about the inclusion of badger research in the Edge Area; that the high risk areas of Sussex could benefit from having the Edge Area measures applied; and that there should be no reduction in the levels of surveillance in the LRA.
48. Some additional comments from farmers about the objectives questioned why there was an aim to stabilise, rather than just reduce, incidence in the HRA, as well as why wildlife control was a medium term option in the HRA. Some called for a road traffic accident (RTA) badger infection map and there was a suggestion that farmers in the LRA should pay for annual testing of their own herd and that of contiguous herds if they bring in cattle from the HRA. There were also some comments that the skin test is flawed, as well as there being little evidence of cattle-to-cattle spread.

Q7. Do you agree with the proposed package of measures for each risk area and proposed cross cutting measures that will apply everywhere?

49. The draft Strategy outlined a number of possible additional measures tailored to each of the areas, such as additional interferon-gamma testing in the edge area; post-movement testing for movements from the HRA to the LRA; and extending the time between short interval tests in the HRA. There were also a number of suggested cross-cutting measures that could apply in all areas. These included risk-based trading; on-farm biosecurity; using compensation to reward good practice on biosecurity; improved advice to farmers including rolling out nationally the South West TB Farm Advisory Service; improved compliance and enforcement; and tackling bTB in non-bovine species.

50. 52% of respondents disagreed with the proposed cross-cutting measures, again mostly disagreeing strongly, with 27% agreeing. Members of the public were again the majority in disagreeing (317 out of 512 respondents), whereas welfare and wildlife groups had a more balanced opinion (8 out of 20 respondents agreeing, with 4 disagreeing). Those with other interests were not in favour (30 out of 65 disagreeing, with 21 agreeing). Veterinary surgeons and those with food and farming interests were largely in favour (70% and 57% respectively).
51. The majority of respondents disagreed with the package of measures for the HRA (70%), whereas this fell to around half for the Edge Area and LRA (with a quarter agreeing). The majority of the public, wildlife groups and those with other interests disagreed with the HRA proposals, whereas the food and farming interests and vets were supportive. Most sectors were in favour of the package for the LRA (except the public, which was still largely opposed to the package for this and the Edge Area). There was more support for the Edge Area strategy from welfare and wildlife groups (50% in favour, although those with other interests remained largely against (29 out of 63 disagreeing).
52. Again, many of the responses were similar to those in the previous two questions. Some additional points made by the public were that compensation payments could be linked to vaccination of cattle and wildlife, Defra should continue to remove Cattle Tracing System (CTS) links between cattle holdings, and that interferon-gamma testing should be used as a parallel test. There were some queries about what was meant by risk-based surveillance and what local eradication boards would be able to choose to do. Those with other interests commented that there should be severe interpretation of post-movement testing, that herds in the LRA should not be able to restock from herds in the HRA, and that further details on the costs of measures, and who pays, should be included in the Strategy.
53. Farmers wanted to see no further trade restrictions in the HRA and recognised that Approved Finishing Units were useful for those under bTB restrictions. There were concerns about the use of whole herd depopulations in such areas without dealing with the wildlife reservoir. There was a suggestion of a one-off annual test for all herds in the country and twice-yearly testing for those herds with access to common land, as well as the need to draw up clear protocols for addressing breakdowns on common land. There was some support for having better information about the location of bTB breakdowns. There were suggestions that Defra funding could be used to help with biosecurity measures in breakdown herds, that short interval tests should still be eligible as pre-movement tests, and that there should be exemptions from radial testing for those herds that have good biosecurity. There was one comment that part of the cost of annual testing should be borne by the farmers. There calls for wildlife surveillance in the Edge Area to establish disease levels.
54. Some vets wanted to see greater emphasis on husbandry factors that needed to be addressed in the Edge Area and the LRA, although one comment stated that the

only foolproof method of ensuring biosecurity (namely permanent housing of cattle in secure buildings with no grazing) 'would be anathema to the public'.

Developing new tools

Q8. To what extent do you agree with our proposals for developing new tools?

55. This question asked respondents to consider two issues. The first was whether the research and development (R&D) proposals were comprehensive or whether any items were missing, as well as whether the multi-disciplinary approach (e.g. bringing together different areas of expertise to develop innovative and integrated approaches was the right way forward. The second question asked respondents to consider whether research and development should focus on specific areas (i.e. test for bTB in cattle; in badgers; vaccines for cattle; and badgers; or whether there were other tools or approaches not included in the Strategy. Other issues outlined in the Strategy include researching into alternative badger control strategies; and research into genetic resistance of cattle to bTB.
56. Nearly half disagreed that the R&D proposals were comprehensive, with a quarter agreeing. The majority of the public disagreed (55%), as did those with other interests, whereas the majority of vets and food and farming interests agreed. Welfare and wildlife groups had mixed support (7 and 6 out of 18 agreeing and disagreeing respectively).
57. Around 56% of respondents felt that items were missing from the R&D proposals but 30% neither agreed nor disagreed. This was consistent across all the sectors except veterinary surgeons, where the highest number neither agreed nor disagreed. The majority (61%) thought that a multi-disciplinary approach was the right thing to do and in all groups the majority of respondents agreed.
58. The vast majority of respondents across all sectors agreed with all four of the detailed options (92% and 78% support for tests in cattle and badgers respectively, and 93% and 86% in favour of continuing vaccine development for cattle and badgers respectively). A higher proportion of the public did not want to see tests to detect bTB in badgers (55 out of 521) than improving tests for cattle (16 out of 532). More farmers would prefer to see a vaccine for cattle (95 out of 129 agree) than a vaccine for badgers (64 out of 124 agree).
59. More than half of respondents (54%) thought that there were other tools not included, whereas 37% neither agreed nor disagreed. A majority in all categories agreed.

60. Comments from farmers wanted to see research on infected badger setts prioritised and more RTA badger surveys. There was some support for looking at other factors such as cattle immunity and why many farms had not had bTB. Some felt that there needed to be more communication on the limitations of vaccines and their deployment, although some wanted to see cattle vaccines developed quickly. Some commented that EU funding might also be used to develop better cattle diagnostics. Some felt though that the multi-disciplinary approach would not lead to improved outcomes and would add extra expense.
61. Vets agreed that they needed to be involved in research and development, although some vets also had concerns about the multi-disciplinary approach. Some commented that we must also learn from the experiences in other countries.
62. Those with other interests expressed a range of views similar to those of farmers and vets, although those with wildlife group interests wanted to see more of a scientific, multi-disciplinary approach but did not want to see research on culling. Some also questioned whether Defra listened to scientific advice as a result of the decision on badger culling.
63. In terms of additional research, farmers were supportive of looking at alternative wildlife control methods (including sett based testing) and population analysis, as well as research into improved diagnostics for all species including a more rapid test for cattle. Research into cattle immunity and susceptibility would also be welcomed. Vets wanted to see further research into the attitudes and barriers to deploying injectable badger vaccines, as well as having an open and ethical review of the current testing regime. Badger contraception to reduce the population was also considered worthwhile by vets and those with other interests, as was more research into disease transmission routes. However many wildlife and animal welfare groups opposed any badger population controls. There were also general calls for more research into farming methods generally and animal nutrition. Those with wildlife group interests wanted to see more research on vaccination and research on cattle movements and environmental factors on bTB, as well as a farm biosecurity rating system. There was a suggestion that there could be more international collaboration on research.

Responsibility for policy and oversight

Q9. To what extent do you agree or disagree with the statements below?

64. This question asked respondents to consider four statements: whether there should be a change in who oversees management of bTB; whether the Government should be solely responsible; whether industry should have more control; and whether other interest groups should have more control.

65. In all categories, respondents thought that there should be changes. Overall, 74% respondents agreed, of these 75% agreed strongly. Only 8% disagreed.
66. Only 12% agreed that the Government should be solely responsible for deciding how to deal with bTB, with 79% disagreeing. Of these, the public and vets were proportionately less in favour of Government deciding than the other sectors.
67. The majority of respondents disagreed that industry should have more control over policy for eradicating bTB (69%) with 18% agreeing. The vast majority (80%) of the public, wildlife groups and other interests respondents opposed this, whereas 70% of farmers and 60% of vets agreed that industry should have more say.
68. Overall, 78% of respondents felt that other interest groups should have more control over bTB policy. The public and wildlife groups were strongly in favour of this, whereas the farming industry and vets (both 63%) disagreed.
69. Members of the public wanted to see more scientific input into policy development. Many felt that the role of Government in bTB control should be reduced as they did not consider the Government to be impartial or trustworthy. There was also the impression that Government was too close to the farming industry and was seen as appeasing farmers by introducing the badger culling policy. Many felt that the industry had too much of a financial vested interest to make objective decisions and that the NFU did not represent the majority of farmers. Instead, wildlife groups should be more heavily involved as they would bring a more objective view and would listen to the public, although some disagreed, arguing that such groups focussed too much on protecting badgers rather than having a healthy badger population. However some felt that all interests needed to be represented on an independent group and that policy needed to be able to survive changes of Government; local eradication boards could also be set up or the AHWBE² or local councils should be responsible. There were other concerns that the 'Badger Welfare Association' was not interested in welfare at all.
70. There were some comments that only those that pay should have a say in bTB controls. Farmers also wanted to have more say if there were to be greater cost sharing. Some farmers wanted to see Government retain control but others thought that farmers themselves would be in a better position to take control by devolving responsibility and money to local groups. There was a suggestion that certain sectors could be responsible for specific issues (e.g. farmers on compensation and wildlife groups on vaccination) and that scientists needed to be more involved. There was general agreement that vets needed to be involved and some views that all groups that are affected should have a say, possibly on an independent board,

² The AHWBE is part of Defra <https://www.gov.uk/government/policy-advisory-groups/animal-health-and-welfare-board-for-england-ahwbe>.

although some felt that the public may be too uninformed. There were some examples of recent good engagement between the Government and industry.

71. Vets felt that the Government must retain overall control, with industry support and possibly through a separate body answerable to Defra.

Q10. How do you foresee governance (e.g. policy responsibility and oversight) arrangements for bTB changing?

72. The draft Strategy outlined the current governance arrangements, which included the AHWBE as the principle source of advice to Ministers on all strategic animal health and welfare matters. An example of arrangements in New Zealand was offered as alternative model. It noted that any changes to governance would need to comply with legal requirements and take account of wider impacts on the Government's capability to respond to animal disease outbreaks.
73. Key farming and veterinary stakeholder organisations were generally in favour of reforming governance structures, with variations on the type of structure or representation. The NFU proposed establishing a Non-Departmental Public Body (NDPB) which should be accountable to Ministers but free from political interference, and be focused on delivering OTF status. They called for real progress to be made on developing a partnership governance structure, noting that discussions have been on-going for over a decade.
74. The British Veterinary Association (BVA) and British Cattle Veterinary Association (BCVA) called for more integrated endemic disease management in the national herd, and more direct formal strategic policy input from industry. They proposed setting up a new not-for-profit industry body called 'Animal Health England' which would have responsibility for all endemic diseases in cattle.
75. The Royal Association of British Dairy Farmers fully supported the BVA-BCVA proposal for 'Animal Health England', seeing links with other bodies such as the Cattle Health and Welfare Group (CHAWG) and Cattle Health Certification Standards UK (CHeCS).
76. The Tenant Farmers Association stressed the importance of having a focused delivery program and making sure bTB control is free from political changes. The Livestock Auctioneers Association called for a partnership governance board with a wide range of industry representation and full control.
77. Some respondents did not support governance reform. The National Trust saw the overall policy responsibility remaining with Government due to the sensitivity of the issues involved and to ensure democratically accountable leadership, which they believe would be at risk with an industry-led approach. The RSPCA disagreed with most of the proposals although they supported the involvement of a wider range of

stakeholder groups in bTB policy development, a position echoed by The Badger Trust.

78. Both the Country Land and Business Association and Association of Independent Meat Suppliers felt strongly that other interest groups should not have a greater say in policy development, while industry should have a genuine dialogue and shared responsibility with Government.
79. Farmers and vets proffered a range of views, many in support of some form of governance change. Some felt that Government must take the lead to ensure strong central leadership but that farmers and vets have a bigger role to play in delivery and input to policy development. Many felt that an industry-led body would deliver better outcomes as farmers were the group most affected by bTB and have the most to gain by the success of the Strategy. There were calls for full veterinary representation and limited wildlife group representation in an industry-led structure.
80. Some vets suggested that a veterinary body should have sole responsibility, led by the UK Chief Veterinary Officer (CVO) and supported by regional panels of vets, and which should be time-limited until England achieves OTF status. Many reiterated that local vets and practices are trusted much more than Government, and are best placed to understand and advise on the local disease risk. Similar proposals were put forward by some for more regional oversight involving local boards which are action-oriented to drive delivery of policy.
81. Some specific suggestions from vets include 'an interim time-limited bTB council operating across the whole of the UK, respecting devolved decision making but truly pulling together best practice and unity across all stakeholders and consumers' and 'a neutral lead panel to work with all interested stakeholders and representatives from each political party'.
82. Public responses often mentioned the need to take a holistic approach beyond purely financial drivers, and that bTB strategy should encompass environmental and ecological groups into policy development. Many public responses felt that there were too many vested interests in the current structure which needed balancing or removing.
83. Wildlife groups and public responses called for a coalition approach to bTB and for closer working across a wider range of interested parties. Some called for constructive action from charity organisations, working positively to address the wider issues around bTB control and help move things forward. Some called for groups such as The Wildlife Trusts and RSPCA to be in sole charge of bTB policy. Some felt that governance should be with an independent Arms Length Body to remove political interference.
84. There were many calls across all groups to remove bTB from political changes, and to reduce political control and lobby group influence. One specific suggestion called

for control to be in the hands of a 'truly independent scientific body with nothing to gain politically or financially by favouring one solution over another'.

85. Overall and across all groups, regardless of differing positions on specific issues, there was support for a consensual, partnership governing and delivery body which is above short term changes whether politically or cost driven.

Delivery arrangements

Q11. To what extent do you agree that – in principle – the current delivery arrangements for bTB should be reviewed and alternatives considered?

86. The majority (83%) agreed that current delivery arrangements should be reviewed and alternatives should be considered, with 518 of the 785 respondents agreeing strongly, although proportionately fewer farmers (61%) than the other categories (ranging from 76% to 89%).
87. Farmers felt that delivery should be made more locally accountable, and that better advice was needed for both farmer and vets, particularly in the LRA. There were some calls for deploying more lay bTB testers, although balanced with others who disagreed with their use in principle, or foresaw potential problems. Farmers felt there was room for improvement on finding better ways to utilise vets and existing farming network organisations, improving salvage prices and making sure delivery was more farmer-focussed. Some farmers felt that the current arrangements should be maintained.
88. Veterinary responses in favour of delivery reform emphasised the need to do more audits and controls around bTB testing, and that it was the delivery side of bTB controls which needed review rather than the overarching framework or strategy. Some vets were in favour of using lay bTB testers, although the key stakeholders were cautious about proper oversight and training. There were calls for flexibility in the rules and devolution of decision making on delivery to the local level. Some vets commented that current delivery is 'chaotic' therefore reform is needed, while others felt that the current set up does operate well.
89. Public responses in favour of reform called for more use of lay bTB testers, and commented that vets could have vested interests in bTB testing delivery. Some felt that delivery should be taken out of Government hands, and removed from EU interference. There were calls to widen delivery, and to focus on enhancing the role of the veterinary surgeon. There was support from the public for the BVA-BCVA 'TB Plus' type of delivery model, with vets taking on more services currently provided by Government. Public responses which were not in favour of reform, felt that there would be issues if delivery was taken away from AHVLA and were opposed to using

lay bTB testers. Other respondees were worried about private companies being involved as their main interest was profit. Some emphasised the importance of maintaining the quality of testing and that vets should provide advice alongside testing services.

90. The key relationship in bTB delivery was succinctly put by one farmer: 'we should never lose sight of the importance of our local veterinary practices and the information they bring.'

Q12. To what extent do you agree that the specific areas of delivery identified in the draft Strategy should be reviewed?

91. The draft Strategy included alternative arrangements for re-tendering of salvage contracts and introducing more competition for bTB testing. There was also a question on whether veterinary businesses should play an enhanced role in provision of bTB services (the 'TB Plus' option) and whether the use of non-veterinarians ('lay testers') to carry out bTB testing should be extended.
92. On re-tendering salvage contracts, the majority neither agreed nor disagreed (53%) and this was the prevailing view for most of the categories, except for vets (where responses were evenly split between each choice). About a third in each category agreed that the contracts should be changed.
93. Farmers voiced concern that re-negotiating the salvage contracts would lead to reduced compensation levels. Others felt that contract tendering has worked well although there were calls for a review as they act as a 'subsidy for abattoirs'.
94. Public views on re-tendering included being against contract tendering in principle, and not believing that tendering helps reduce costs. Some were worried that re-tendering could be counter-productive and, more generally, that that bTB reactor meat enters the food chain.
95. On increasing competition for bTB testing, around a half of all respondents agreed and a third neither agreed nor disagreed. The public mostly agreed with this (53%) but this fell to around a third of farmers and only 11% of vets agreed.
96. Farmers felt that increasing competition would not work as there were not enough vet practices to compete, and voiced concerns that competitive tendering 'would reduce the number of English vets'. They also felt that it would risk undermining their relationship with their local vets. This was echoed by vets, who were also worried that 'big companies will Hoover up the contracts'. Some public responses were also worried that increased competition only leads to cutting corners, and called for only non-profit making organisations to be involved.

97. On an enhanced role for veterinary businesses, 60% of respondents agreed, including the public, vets and farmers. Around half of wildlife groups and other interests agreed. Only 10% of all respondents disagreed.
98. Farmers called for a greater role for vets, although conversely some vets stated that they already provide advice and additional services, implying greater enhancement is not required. Public responses showed support for vets taking on a wider role, and for the 'Cymorth TB' veterinary advice approach piloted by the Welsh Government. An interesting suggestion was for small farmer consultancy services. Some respondents did, however, feel that vets were too close to farmers and that they should not have a bigger say.
99. On extending the use of approved lay bTB testers, 55% of all respondents agreed. Support was greatest amongst the public and wildlife groups, whereas there was slightly less support from farmers (42%) and vets (33%). A third of vet respondents disagreed with the proposal although both the BVA and BCVA supported it.
100. Both farmers and vets provided a range of views from supporting lay bTB testing to disagreeing strongly. Some farmers stated that they would not have confidence in lay testers, and some vets were worried about lay testers signing off test charts which state that the health of the herd has been assessed (i.e. that other cattle diseases have been checked). Vets also felt that blood testing should only be carried out by qualified professionals.
101. Specific concerns also appeared in the public's responses: such as the need to ensure the quality of testing done by lay staff and questions on how they would be monitored.
102. About two-thirds of respondents thought that there were other options that should be explored, whereas farmers were more inclined to neither agree nor disagree, as were vets.
103. Some options put forward by farmers were that vets should be allowed immediately to lift movement restrictions on the day of the relevant clear test, and that the passports of inconclusive reactor cattle should be marked and not sold on. Public suggestions ranged from more biosecurity monitoring and re-opening AHVLA veterinary labs, to more rapid DNA testing.

Funding

Q13. Do you agree that a more sustainable funding model should be taken forward under the Strategy?

104. The draft Strategy looked at the funding responsibilities for bTB controls. It highlighted future pressures on Government finances and the need for a more sustainable funding basis for the future control framework.
105. Around half of farmers agreed that a more sustainable funding model should be taken forward. This increased to around 60% for the public and slightly higher still for wildlife groups. Vets were most in favour (14 out of 19 responses – 73%).

Q14. Do you think the following potential funding options should be explored further?

106. The draft Strategy outlined four possible funding models. These were: stakeholders paying more for bTB measures (e.g. farmers paying their Official Veterinarians (OVs) for bTB testing or stakeholders paying for the deployment of cattle and badger vaccination); Government reducing its intervention in the market (e.g. by encouraging the increase in private slaughter of reactors by reducing compensation); developing insurance options; and the establishment of a mutual bTB control fund co-financed by Government.
107. 60% of respondents said that stakeholders should pay more for bTB measures, 45% agreed with reducing Government intervention in the market and nearly 60% agreed that options for both insurance and a mutual fund should be explored further. Whilst the majority of farmers did not want to see stakeholders paying more for bTB measures (64%), more would be inclined to explore a mutual fund (37%) than reducing government intervention (17%) or exploring insurance (28%). The other categories of respondents agreed that stakeholders should pay more towards bTB controls. Around half of vets disagreed that Government should reduce its intervention in the market, whereas a half of wildlife groups neither agreed nor disagreed. Vets, the public and other interests were also in favour of exploring further options for insurance and a mutual fund.
108. Of those farmers who supported exploring funding options, many called for EU CAP Pillar 2 (rural development) subsidy payments to help pay for bTB control and in particular biosecurity improvements. The need for more transparency about where Government money is spent was also mentioned. Of those who disagreed with looking at other funding options, many felt that Government should pay because of the impact of previous policies and because bTB is a notifiable disease therefore Government has a statutory responsibility to pay.

109. On stakeholders paying more towards bTB controls, there was qualified support from farmers, many of whom called for a correlation between contributing more and having more say in policy development and control over the wildlife vector. Some felt farmers should only pay more once the disease was reduced and only if it funded a stakeholder body focused on delivery. Some stressed the principle of fairness, and that all stakeholder groups should contribute including wildlife and retailer bodies or that a disease levy would share the cost burden. Some vets and many public responses commented that if farmers paid more it could lead to improved biosecurity and risk management.
110. On reducing Government intervention some farmers disagreed stating that it would disincentivise Government as their risk would be reduced, and that Government has a role in removing and paying for bTB reactors. Some felt it could be feasible if Government underwrote condemned carcasses. Some public responses called for removing compensation altogether, or reducing it linked to farm practices.
111. On insurance, many farmers felt commercial insurance would be financially prohibitive and unavailable to those in the HRA unless there was Government underpinning. They also felt that it was an unrealistic option until the wildlife risk was reduced, and that insurance companies would not engage until this had happened. Vets called for bTB to be included in existing farm assurance schemes which could help in defining the insurance risk. Public responses called for a Government insurance scheme or a compulsory scheme with premiums based on farming practices.
112. On a mutual fund, some farmers felt that this would be viable but only once the disease was under control, but it could offer a 'self-insure' option through a farmer mutual fund. Conversely, other farmers felt that spending decisions would be dominated by vested interest and would be a waste of money. Vet comments included the call for badger groups to pay a levy towards a mutual fund, and public responses suggested establishing an international global bTB fund. Some public respondees also called for profits from higher-priced meat and dairy products to help pay for bTB controls, and called into question retailers' policies on driving farm-gate prices lower which have added pressure to lower production standards
113. There were warnings from farmers that added costs could result in more intensive, large-scale farming as small-scale farmers sell up. Many public responses commented that farmers should pay the same as any other industry would be expected to and highlighted the subsidies which farmers received. One public comment sums up this position: 'I have great sympathy for farmers but no other business gets compensated if hit by something outside its control.'

Q15. Should any other funding-related options be explored?

114. A total of 83% of respondents (345 of 415) said that there were other options that should be explored.
115. Proposals from farmers included dairy and beef levies on the big supermarkets and large dairy/beef processors, increasing existing levies to cover bTB controls, and wildlife groups paying for wildlife measures. Some farmers called for a proportion of their EU CAP subsidy payments to go towards bTB control (both Pillar 1 - direct payments and Pillar 2 - rural development) and a tax on maize crops. Other options put forward were to use funding models used for other livestock diseases and establish an investment-offsetting pooled fund which is used in Australia. One farmer commented: 'We are the dirty farm of Europe. We need a revolution in our current cosy world of animal health.'
116. Vets felt that existing levies could pay for farmer education schemes, and called for a levy on dead stock assessed by the numbers of returned cattle passports. They also felt that landowners and wildlife groups should pay more.
117. Public responses included a call for the EU to pay more because they block trade in vaccinated cattle, and that the NFU should pay for bTB compensation. There were calls for an increase in Defra's budget and a reduction in other Government department budgets to pay for this, and for a public-private partnership for badger vaccination.

Monitoring and evaluation

Q16. Do you agree with the proposed approach to monitoring and evaluation?

118. The draft Strategy provided suggestions on ways for monitoring the effectiveness of the Strategy as a whole. This included better use of epidemiological information, use of statistics and how to use media and social coverage.
119. The responses were fairly even between the three options, with 29% agreeing, 39% disagreeing and 32% neither agreeing nor disagreeing. A larger proportion of the public tended to disagree (46%) whereas the other categories of respondent tended to agree (46% of farmers, 68% of vets, 67% of wildlife groups and 37% other interests).
120. Farmer views from those who did not agree ranged from concerns that monitoring and evaluation would be used as a delaying tactic, to it being too complicated and that media and social media coverage do not have anything to do with bTB control. Farmers who supported the approach felt that this should already be in place, and that as a public health matter proper monitoring is critical. They felt that monitoring

would hold the ‘target setters’ to account, and that a national database was needed to help evaluation and farmers should be told about disease levels in local wildlife.

121. Vets supportive of the approach called for better monitoring of testing, biosecurity and isolation units, and that epidemiological data should be used instead of modelling. Some vets felt the money would be better spent on funding OVVs.
122. Public responses agreeing with the approach ranged from the need to include ecological analysis, that levels and geographic areas of infection should be publicly available, and that other livestock diseases should be included. Others felt that the Strategy was so flawed it could not be assessed, and asked whether the media and social media element should be included. There were directly opposing views on who should carry out monitoring and evaluation: some felt only Government could do this, while others called for an independent analytical group. Others also felt the approach was not tailored enough to evaluate specific interventions.

Other comments

123. Farmer comments covered areas such as extending the Strategy to Scotland and Wales, questioning whether bTB is in fact the most pressing animal disease problem, concerns that agricultural shows or animal gatherings were weren’t included, and that the full costs to farmers aren’t taken into account. Some also felt that bTB disease control in non-bovines was not discussed enough.
124. Vet responses indicated some scepticism about whether new ideas are properly considered or taken seriously, that the Strategy is deregulatory, and that the health risk to humans and animals is overstated. One comment, however, proposed that farmers should put up notices on footpaths warning of the risk of bTB infection.
125. Public responses showed concerns that the Strategy was just about moving costs away from Government, and that the proposals were too bureaucratic. Some felt that bTB ‘doesn’t have to be controlled at all’, and many comments recorded dissatisfaction with no direct question on badger culling³. Some respondents felt that the impacts of TB control on nature and conservation strategies had been underrepresented.
126. Farming industry and public attitudes are important to any evolution of bTB control in England. One farmer commented that ‘many farmers are now in the position where they are happy to do more than the absolute minimum of testing to keep bTB

³ A consultation on badger control policy was held in 2010 and the report is available at <http://webarchive.nationalarchives.gov.uk/20110203030352/http://www.defra.gov.uk/corporate/consult/tb-control-measures/index.htm>

away from their farms. Defra should research how to tap into the goodwill of farmers so that we can all be seen to be on the same side.'

Stakeholder engagement workshops: Defra Citizen Dialogue on bovine TB

127. As part of the consultation, the OPM[®] Group⁴ delivered ten independently facilitated stakeholder workshops involving approximately 250 people across England in September 2013 as part of the Citizen Dialogue project⁵ co-funded by Defra and Sciencewise-ERC⁶. An overarching report covering all ten workshops will be published on the Defra website.

Public workshops and online public engagement: Defra Citizen Dialogue on bovine TB

128. Although not part of the public consultation, the OPM[®] Group also delivered three independently facilitated public workshops and an online public engagement on the future of bTB policy between September and December 2013 as part of the Citizen Dialogue project. The findings will contribute to the development of future policy.
129. The public workshops in September and October were held in three locations across England: Birmingham, Exeter and Newcastle. Each workshop was reconvened in the same location two weeks later. Approximately 40 participants attended each workshop. Participants were recruited to broadly reflect the diversity of the local population. At the first meetings, participants were informed about bTB via information sheets and a bespoke animation developed specifically for the project and which covered the main points in the draft Strategy as well as illustrating the background and epidemiology of the disease.
130. At the second meetings participants were asked to consider in more detail areas such as governance, funding and disease control options. Participants used interactive voting at a number of points during the workshops. This enabled them to express their views as individuals in addition to contributing to group discussions.
131. The online public engagement involving 65 recruited members of the public was carried out in November and December 2013.

⁴ <http://www.opm.co.uk/our-work/>

⁵ Defra Citizen Dialogue on Bovine TB research and development project SE3049: <http://randd.defra.gov.uk/>.

⁶ <http://www.sciencewise-erc.org.uk/>

132. A full analytical report of the Citizen Dialogue project with findings from the stakeholder and public workshops, and the online public engagement, will be published on Defra's website.

Next steps

133. Defra is very grateful for all those who took the time to respond to the consultation or to attend the stakeholder or public engagement events. Defra will publish the final bTB Strategy in early 2014 and this will be the Government's official response to this consultation.

Annex A: List of organisations who responded to the consultation

Animal Welfare Enforcement Agency	National Farmers Union
Association of Independent Meat Suppliers	National Trust
Association of Show and Agricultural Organisations	Noah's Ark Zoo Farm
Badgerland	Northern Farmers and Landowners Group
Badger Trust	RASE
Badger Trust - Sussex	Rethink bTB
Badger Welfare Association	Royal Association of British Dairy Farmers
Brent Lodge Wildlife Hospital	Royal Society for the Prevention of Cruelty to Animals
British Cattle Veterinary	Scottish Badgers
British Llama Society	Secret World Wildlife Rescue
British Veterinary Association	Shepton Farms Ltd
Cheshire East Council	Stapeley Veterinary Practice Ltd
Chillingham Wild Cattle Association	Stop the Badger Cull
Country Land and Business Association	Strutt & Parker
Deer Initiative	TB Busters
DJ Cocks and S Child (partnership)	TB Free England
Fairfield Farm	Tenant Farmers Association
Farm Animal Genetic Resources (FAnGR) expert committee	Trading Standards Institute
Garston Veterinary Group	Upperstone Farm
Humane Urban Wildlife Deterrence	The Wildlife Trusts
HW ME Teague and son	
International Fund for Animal Welfare	
K J Bragg & partners	
K Jerseys	
Leicestershire and Rutland Badger Group	
LionAid	
Livestock Auctioneers Association	
National Beef Association	