



Department
for Environment
Food & Rural Affairs

Enhanced bovine TB surveillance and controls in the High Risk and Edge Area of England

**A summary of responses to the
consultation exercise and the
Government's way forward**

16 December 2016



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1. Introduction

1.1 This document summarises responses to Defra's public consultation on new cattle measures to tackle Bovine TB, which ran from 30 August 2016 to 8 November 2016. Defra received a total of 70 written or online responses to the consultation: 61 were via the Citizen Space portal and 9 were e-mailed to the BTB Engage mailbox. Where agreement/disagreement was not completely clear in the written responses, they are included in the 'other' percentage breakdown for each proposal.

1.2 53 responses were received from individuals, including farmers and vets, and 17 were from organisations. The organisations are listed in Annex A.

1.3 The purposes of this document are to provide a summary of the responses received and set out the Government's plans going forward. Copies of responses (with the exception of those where the respondent requested that their response should not be released) can be obtained from:

Cattle Measures Team
Defra, Bovine TB Programme
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17 Smith Square
London SW1P 3JR

2. The Measures

2.1 The consultation was one in a series aimed at introducing proportionate TB control measures in cattle that will, when combined with measures to address the TB risk posed by badgers, increase the probability that the goal of national official TB freedom will be achieved by the target date of 2038.

2.2 The proposals set out in the consultation fell into two broad categories:

- Enhancing the TB control framework through more sensitive testing of cattle from TB breakdown herds.
- Making faster progress on the road to achieving official TB freedom for Counties in the Edge Area of England.

2.3 The proposed measures were:

- i. Increase the sensitivity of breakdown testing by making wider use of interferon-gamma parallel testing in TB breakdown cattle herds in the High Risk Area of England (HRA).

- ii. Increase the sensitivity of skin testing of cattle traced from infected herds by using the 'severe' interpretation.
- iii. Mitigate the risk posed by inconclusive skin test reactors that resolve upon retesting.
- iv. Introduce more effective controls on the movement of cattle between two TB breakdown herds.
- v. Harmonise the scheduling of Short Interval Tests in TB breakdown herds.
- vi. Re-define the Edge Area boundaries by incorporating as whole counties those that currently straddle the High Risk and Edge Areas of England.
- vii. Increase the sensitivity of surveillance testing by extending six-monthly testing or radial testing to all parts of the Edge Area.

2.4 We also requested views on three further potential measures:

- viii. To introduce powers to enforce herd biosecurity measures to reduce TB reinfection risks.
- ix. To restrict approval of slaughter sales ('red markets') of TB-restricted cattle to the HRA and Edge Area.
- x. Possible enhancements to the interactive map of TB breakdowns in England and Wales (ibTB).

3. Summary of responses

Wider use of interferon-gamma testing in TB breakdown herds in the HRA

The proposal

3.1 To introduce compulsory interferon-gamma blood tests (alongside skin testing) to help resolve TB breakdowns with lesion and/or culture positive animals in the HRA where any of the following 3 criteria are met:

- Criterion 1: the APHA veterinary investigation concludes that the most likely TB transmission route for the affected herd was contact with infected cattle and measures are in place to prevent further spread of disease from this source;
- Criterion 2: the infected herd is located in one of the areas where licensed badger population control is being conducted; and

- Criterion 3: there is clear evidence that repeated skin testing of the herd has failed to resolve a TB incident.

The responses

3.2 The breakdown of responses was as follows:

Agree – 61% Disagree – 11% Other – 28% Not Answered – 0%

Most respondents agreed with this proposal on the basis that it was a proportionate approach to a significant problem. They agreed that a more sensitive testing regime is needed to minimise the risk of leaving infected animals in TB affected herds after restrictions have been lifted.

3.3 The Country Land and Business Association (CLA) response summarised well the views of many of those who supported the proposal:

‘The CLA support the introduction of interferon-gamma testing based on the 3 criteria. This type of intense testing in the cull area will mean the TB is found, contained and those positive cattle culled quickly to stop further infection between cattle and the wildlife population.’

3.4 17 respondents agreed in principle with this proposal, though two elements caused some concern. The National Farmers’ Union (NFU) and others, while recognising the need to use more sensitive testing to get on top of the disease, suggested that using the interferon-gamma test in badger cull areas could affect the appetite of some cattle keepers to include their land in a cull area. The NFU recommended that Defra should not consider implementing this policy:

‘... until year 3 or 4 of a successful cull, or in support of a maintenance culling policy’.

3.5 The British Cattle Veterinary Association (BCVA) and the British Veterinary Association (BVA) agreed that wider use of the interferon gamma test would facilitate more complete removal of infected animals from breakdown herds. However, both took the view that where an uncontrolled reservoir of disease exists in the local wildlife as a source of reinfection, the use of the interferon gamma testing should be considered on a case by case basis. They suggested that the test should only be applied when all 3 criteria are met.

3.6 Some of those who disagreed with the proposal had concerns that the test would identify an unacceptable number of false positive cattle. This was also an issue for other respondents, though the NFU noted that:

‘... the test would only be used in lesion or culture positive breakdown herds, where the risk of taking out low numbers of false-positives is outweighed by the need to identify and remove all infected cattle quickly’.

The way forward

3.7 The Government intends to expand the use of interferon-gamma testing in TB breakdown herds in the HRA based on the three proposed criteria. For criterion 2 (the infected herd is located in one of the areas where licensed badger population control is being conducted) we have taken on board the recommendation from the NFU (and others) that government should delay using this more sensitive test until some years of culling have taken place. In badger population control areas we will start using the interferon-gamma test only after 2 successful years of culling. Further announcements, including on when the new policy will be rolled out, will be made on this in due course.

3.8 We will also publish, via the TB Hub (www.tbhub.co.uk), a note which summarises the results of using the interferon-gamma test in the high TB incidence parts of the Edge Area of England since its rollout in January 2014.

Increasing the sensitivity of skin testing of cattle traced from infected herds by using the ‘severe’ interpretation

The proposal

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

The responses

3.10 The breakdown of responses was as follows:

Agree – 84% **Disagree – 6%** **Other – 9%** **Not Answered – 1%**

3.11 The NFU stated that its members in the TB High Risk Area (HRA) wanted a testing regime that minimised the amount of skin-testing required. Nonetheless, it noted:

‘If no alternative testing regime was acceptable, then the NFU would support Defra’s need for a consistent policy by introducing the testing of trace animals under severe interpretation.’

The Born Free Foundation stated:

‘... testing of cattle traced from infected herds, and all cattle with which they have subsequently come into contact, should of course be conducted using severe interpretation, combined with gamma interferon testing in order to maximise the sensitivity of such testing.’

The National Beef Association (NBA) said that

'... to prevent the spread of TB we agree with the use of severe interpretation although it increases the likelihood of false positive test results, this is more than balanced by the consequences of missing infected animals going into the LRA.'

Westpoint Farm Vets included in their response:

'Tracers have the highest rate of disclosure of TB in the HRA of any test type at an animal level. As such using severe interpretation for this would be prudent.'

Way Forward

3.12 Given the level of support for this proposal, the Government will, from 1 April 2017, require spread tracing test results to be read using severe interpretation.

Mitigating the risk posed by inconclusive skin test reactors (IRs)

The proposal

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

The responses

3.14 The breakdown of responses was as follows:

Agree – 67% **Disagree – 11%** **Other – 21%** **Not Answered – 1%**

3.15 Although most respondents agreed with the proposal, a number of representative organisations expressed doubts. Of those who had concerns about the proposal, the NFU's view was that compulsory slaughter of inconclusive reactors would be a better option. It asked:

'... why Defra doesn't just remove the inconclusive animal as a reactor and pay the farmer compensation, instead of leaving the farmer with a potential disease reservoir which he is unable to remove, other than direct to slaughter or via a red market.'

3.16 Five other stakeholder groups shared the opinion most clearly expressed by the BVA 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.'

3.17 Some respondents focused on the additional costs and practicalities of keeping IRs on farms. Three individuals raised concerns about the disease risk posed to other cattle, whilst others highlighted a need for greater monitoring of provision of isolation units on farms.

3.18 Five representative organisations suggested that, if the proposal is implemented, IRs should be tagged so that they could not be sold or moved on at a later date. The BCVA, BVA, NFU and the National Animal Health and Welfare Panel, suggested the use of DNA tags.

Way forward

3.19 Currently, herd owners in England have the option (subject to some restrictions) of applying to APHA for permission to carry out at their own expense private interferon-gamma testing of IRs and skin test-negative cattle that do not qualify for a government-funded blood test. Defra pays compensation for any animals that react to a private interferon-gamma blood test and are compulsorily slaughtered as a result. The Government's intention is that resolved IRs subsequently subject to a private interferon-gamma test with negative results will not be restricted for life. In other cases, it will be proportionate and sensible to permanently restrict IRs that clear their skin re-test to the holding in which they were identified. This will take effect from 1 April 2017.

More effective control of the movement of cattle from one TB breakdown herd to another

The proposal

3.20 We should only allow movements of cattle between two TB-restricted holdings where the destination herd is due to have at least two short-interval tests (SITs) at severe interpretation. 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.

The responses

3.21 The breakdown of responses was as follows:

Agree – 57% **Disagree – 22%** **Other – 17%** **Not Answered 4%**

3.22 There was a range of views on the merits of the proposal. In support, Westpoint Farm Vets stated that:

'... reducing the risk of cattle moving bTB between holdings must be part of the control strategy, whilst recognising that this might be difficult for farms.'

The CLA noted:

‘... cattle should have at least two SIT at severe interpretation to make sure that no cattle are infected and pose a risk to the herd health of the holding they are moving to.’

The Born Free Foundation felt that the Government could go further and limit movement of cattle completely from restricted herds.

3.23 Of those who disagreed, BCVA, BVA, NFU and the Livestock Auctioneers’ Association (LAA) considered the proposal disproportionate to the disease risk. One HRA farmer felt that the proposal was complicated, suggesting:

‘... given the APHA vet risk assessment determines a licence to trade and move cattle between Farm 1 & 2, could Gamma Interferon be used on the moved cattle, in addition to the skin test, as well as isolation on farm pre and post movement. Could the additional cost be shared by Government, vendor and purchaser?’

Way forward

3.24 This is a complex proposal designed to ensure a more rational approach to the testing of cattle moving between herds under TB restrictions (and thereby of higher risk). The example included in the consultation document is the simplest way of explaining why change is necessary:

- Cattle are moved from farm 1, which will be released from TB restrictions if its next scheduled SIT gives a negative result.
- Farm 2 is in the same situation, i.e. one more negative test is needed to allow TB restrictions to be lifted.
- However, the SIT on farm 1 discloses test reactors with visible lesions of TB. As a result, that herd now needs at least two further SITs at severe interpretation.
- No reactors are disclosed on farm 2 following the SIT that included the cattle moved from farm 1. The holding reverts to OTF status (movement restrictions lifted) and all cattle – including those from farm 1 - can be sold onto the open market.

3.25 Given the risks of disease spread in the event of plausible circumstances such as those set out above, the Government’s view is that the proposal is necessary. It will, therefore, be put in place and take effect from 1 April 2017.

Harmonising the scheduling of Short Interval Tests in TB breakdown herds

The proposal

3.26 When reactors are identified in a TB breakdown herd, the next Short Interval Test (SIT) should take place at least 60 days after removal (rather than detection) of all of those reactors.'

The responses

3.27 The breakdown of responses was as follows:

Agree – 70% **Disagree – 10%** **Other - 17%** **Not Answered – 3%**

3.28 13 respondents, including 6 stakeholder groups, while agreeing in principle noted that in order to be acceptable the removal time of reactor cattle needed to be as short as possible. This was most clearly expressed by the Dartmoor Commoners' Council, which stated:

'The speedy removal of infected animals from the holding is an important factor in the control of this disease, there is room for improvement here.'

3.29 Some respondents were critical of current removal times, which they said varied considerably across the country. Dairy UK proposed a time limit (rather than target) while others suggested that 5 working days might be a suitable target.'

On the proposal, the NFU suggested that testing should take place:

'... 60 days from reading the previous test, not from removal.'

3 veterinary organisations referred to difficulties in scheduling tests. The BVA and BCVA suggested 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'.

Way forward

3.30 Given the importance of ensuring a consistent, logical and robust approach to management of the disease risks, the Government has concluded that the 60 day minimum period between SITs should, as proposed, begin from the date on which the last test reactor is removed from the affected holding. Any other approach risks affecting the probability of detecting infected cattle and is, therefore, undesirable. APHA will update its operational procedures so that this consistent approach is applied with effect from 1 April 2017. The Government acknowledges concerns about reactor removal times and will continue to closely monitor them in all areas of the country

All counties that straddle the High Risk and Edge Area of England to be incorporated completely into the Edge Area

The proposal

3.31 The counties of Oxfordshire, Warwickshire, Derbyshire, Cheshire and East Sussex, which are currently split between the Edge Area and the HRA, should in future fall wholly into the Edge Area.

The responses

3.32 The breakdown of responses was as follows:

Agree – 78%; Disagree – 9%; Other – 7%; Not answered – 6%.

3.33 The BVA and the BCVA supported the proposal on the basis of the associated benefits of increased surveillance and testing in these counties. So too did the NFU, for similar reasons. However, it sought assurance that farmers are included in the implementation of this policy and given ample time to put any new testing regimes into place. The NFU also sought assurance that badger culling in the Edge Area will remain a viable policy option if these proposals are implemented.

3.34 Also in support were Dairy UK, the National Animal Health and Welfare Panel, RSPCA, the CLA, the Tenant Farmers' Association (TFA) and the Born Free Foundation. The latter noted that where the Edge Area counties benefit from more frequent testing and greater use of gamma interferon it makes sense to include the whole of these counties in the Edge Area.

3.35 On the other hand, the NBA disagreed with the proposal, suggesting that the Edge Area does not really exist and that currently split counties should instead be designated as all HRA. A number of other respondents were critical of the proposal, arguing that it was irrelevant if the wildlife reservoir is not dealt with – one of them suggesting that it would be better to await the results of the current survey on road kill badgers before making any change.

Way forward

3.36 Most respondents supported the proposal and the Government intends to make the changes as soon as practically possible. The timetable for implementation will take account of the NFU's request that affected farmers are properly forewarned of the changes and given sufficient time to adapt to the new testing regimes.

Extension of 6-monthly surveillance testing to additional parts of the Edge Area, with radial testing applied in the rest of that Area

The proposal

3.37 Six monthly surveillance testing should apply to additional parts of the Edge Area. In the rest of the Edge Area, annual whole-herd testing would be supplemented with more frequent testing of herds situated within a 3km radius of a breakdown herd.

The responses

3.38 The breakdown of responses was as follows:

Agree – 76%; Disagree – 4%; Other – 11%; Not answered - 9%.

3.39 The NFU disagreed with the proposal, suggesting there should be just one testing regime in each county. The LAA made the same point. They argued that a split testing regime in one county could prove confusing and create trading and farming management issues, as well as accidental non-compliance. The NFU sought assurance that badger culling in the Edge Area will remain a viable policy option if these proposals are implemented.

3.40 Others also highlighted the importance of tackling wildlife vectors in the Edge counties. One veterinary practice suggested that regular monitoring for disease in badgers and effective culling is essential to local progress. Some were concerned about the cost and administrative burden to farmers.

3.41 The NBA supported the proposal, suggesting that:

‘Although there are additional costs to the introduction of a changed testing regime if it creates a barrier to TB creeping further north, then it will be a cost worth paying. Six-monthly herd testing where incidence of the disease is highest and where radial testing is not possible seems a reasonable approach and the use of radial testing around OTFW incidents in all other parts of the new Edge Area would make sense’.

3.42 The CLA supported the proposal, but with conditions. It stated:

‘The CLA agree with the proposal but it must be based on sound scientific evidence that increasing the testing interval to six months actually reduced TB incidents. The cost to farmers and industry must show value in the short term for it to be acceptable to implement’.

3.43 The BVA and BCVA also supported the proposal, the latter noting:

‘BCVA 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 ... This measure is in line with the principle that the most intensive control measures need to be applied in the Edge Area to ensure that

the disease does not spread into the Low Risk Area and with an objective to gradually drive infection back inwards towards the HRA.

3.44 The Born Free Foundation argued that these measures should be introduced alongside a strictly enforced risk-based trading approach to reduce the possibility of spread of undetected infection to holdings within the Edge Area. The Animal Welfare Group welcomed the suggestion of six-monthly testing, but had concerns about using the comparative skin test as the primary surveillance test.

Way forward

3.45 The Government recognises that increasing the frequency of testing throughout the Edge Area will have significant costs for herd owners, at least in the short-term (although the expectation is that it would find infected herds sooner, reducing the overall costs in the longer term). For that reason, decisions on whether, and if so how, to implement the proposal will be made on a county by county basis, involving representative organisations in that process.

A call for views on other possible measures to reduce re-infection risks

What we asked you to comment on

3.46 We invited your views on whether we should work up proposals for introduction of Veterinary Requirement Notices (VRNs), which would provide powers to require cattle keepers to take certain actions by a specified date to reduce the risk of TB spreading either within their own herd or to others.

The responses

3.47 The breakdown in responses was as follows:

Agree – 56% **Disagree - 23%** **Other – 17%** **Not Answered – 4%**

3.48 A small majority of respondents agreed with this proposal, one individual stating that the introduction of VRNs:

‘... would have a positive effect and would reinforce the requirements on farmers to take positive steps to prevent possible spread of infection.’

3.49 The RSPCA felt that stronger enforcement powers were necessary and that the VRN method:

‘... would ensure all producers had an obligation to improve biosecurity and doesn't just target those currently under TB restrictions.’

3.50 The BCVA acknowledged the need for additional measures to encourage the adoption of biosecurity measures but questioned whether VRNs would be the best way of

achieving this. Two other respondents had concerns about the effect these could have on the working relationship between vets and their farmer clients. Three respondents asked for an analysis of the costs and benefits of the use of VRNs in Wales.

3.51 The CLA suggested that measures:

'... should not be enforced without financial assistance as a holding under restrictions can also be under great financial constraint'

One individual suggested that farmers may need grants to implement biosecurity measures.

Way forward

3.52 A small majority of respondents indicated that they would like the Government to do further work in advance of a possible consultation on a specific proposal. We will, therefore, initiate the necessary work towards this, including preparation of an Impact Assessment.

Limiting approval of slaughter sales ('red markets') of TB-restricted cattle to the HRA and Edge Area

What we asked you to comment on

3.53 We invited your views on whether we should limit TB red markets in future to the HRA and Edge Area of England only.

The responses

3.54 The breakdown in responses was as:

Agree – 73% **Disagree - 16%** **Other – 7%** **Not Answered – 4%.**

3.55 The BVA noted that limiting red markets to the HRA and Edge Area of England:

'... would have a very limited impact on the industry and would provide further important support to the OTF status application for the LRA.'

3.56 On the other hand, the LAA and the NFU felt that the proposal was disproportionate to the disease risk. They suggested that, instead of withdrawing licenses, Defra should work with the red markets and their representative body to ensure that biosecurity standards are implemented in these units and that any concerns are addressed.

3.57 The NFU and CLA were concerned about the economic impact loss of red markets in the LRA. The CLA suggested that:

‘Alternative outlets for TB cattle in the LRA would have to be made available as the transport costs to a red market in the HRA or Edge Area may be uneconomical for farmers.’

3.58 On similar lines, the Animal Welfare Group, the NFU and one individual raised concerns about the possibility that animals might need to be transported greater distances as a result of closing red markets in the LRA, which could lead to animal welfare issues.

3.59 Three respondents thought that red markets were essential, one of them stating that:

‘... it is essential that farmers that are under restriction have an outlet to sale providing that there is only one way - direct to slaughter.’

Way forward

3.60 The Government will reflect further on this. Any specific proposal to limit approval of red sales would be subject to consultation.

Sharing TB breakdown information – ibTB

What we asked you to comment on

3.61 We invited your views on possible further enhancements to the Information bTB website. More specifically, we asked you:

- What additional information you want to see on ibTB.
- Whether ibTB should be extended to other cattle diseases.

The responses

3.62 We received a number of suggestions for further enhancements to ibTB, including adding:

- Breakdown locations for TB in non-bovine species (suggested by two respondents).
- Details of previous restrictions imposed on a herd.
- A history of TB breakdowns on holdings more than five years previously.
- Information on TB spoligotypes in breakdown herds.
- Badger cull areas to the electronic map.
- Details of movements of livestock
- The herd type (beef or dairy) of restricted herds.

3.63 Some respondents suggested we should avoid adding significantly to ibTB and not let the inclusion of other diseases detract from its primary purpose.

Way forward

3.64 From January 2017, a data refresh for ibTB will be carried out every two weeks (previously it was every four weeks). We are grateful for the suggestions received in this call for views and, although there are no immediate plans to update ibTB, all of the suggestions we have received will be considered in due course.

4. Annex A: List of organisations that responded to our consultation exercise

Animal Welfare Group

Born Free Foundation

British Cattle Veterinary Association (BCVA)

British Veterinary Association (BVA)

Chartered Trading Standards Institute

Country Land and Business Association (CLA)

Dairy UK

Dartmoor Commoners Council

HNV Associates Limited

JT Rural Office Services

Livestock Auctioneers' Association Ltd (LAA)

National Animal Health and Welfare Panel

National Beef Association (NBA)

National Farmers Union (NFU)

National Farmers Union Scotland (NFUS)

RSPCA

Tenant Farmers Association (TFA)