



Department
for Environment
Food & Rural Affairs

Bovine TB: a call for views on potential improvement and simplification of the TB testing regime in the High Risk Area of England

A summary of responses to the call for views and the Government's way forward

16 December 2016



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1. Introduction

1.1 This document summarises responses to Defra’s call for views on options for simplifying the TB testing regime in the High Risk Area (HRA) of England, which ran from 30 August 2016 to 8 November 2016. Defra received 48 responses to the consultation, of which 35 were from individuals, including farmers and vets, and 11 were from organisations. The organisations are listed in Annex A.

1.2 Copies of responses (with the exception of those where the respondent has requested that their response is not released) can be obtained from:

Cattle Measures Team
Defra, Bovine TB Programme
Area 5D Nobel House
17 Smith Square
London SW1P 3JR

2. Purpose of the call for views

2.1 This call for views was an invitation to help Defra determine whether there would be merit in developing, for consultation, detailed proposals for a simpler and more effective TB testing regime in the High Risk Area (HRA) – built around a default position of six-monthly routine surveillance testing.

3. Proposed policy principles

3.1 The TB testing landscape has become more and more complex over the last few years; the main catalyst for this has been the Government’s aim of achieving Officially TB Free (OTF) status for the whole of England by 2038. New cattle controls have been introduced and combined with the existing rigorous testing regimes for herds contiguous to TB breakdowns, cattle traced from infected herds, check tests and other risk-based testing arrangements.

3.2 We said in the call for views document that a simplified TB testing regime in the HRA could include:

A. Default six-monthly surveillance testing, with some flexibility around timing to reflect keepers’ business operations.

B. Annual testing in herds which are deemed to be low risk, based on criteria such as local epidemiological situation, the herd TB history, purchasing record and/or CHeCS herd accreditation.

C. Replacement of 60-day Short Interval Tests by three-monthly testing in TB breakdown herds.

D. Adjustment of testing windows for most risk based tests, such as contiguous, post breakdown check tests and trace tests, to reduce the need for these tests outside the six-monthly testing routine.

E. Maintenance of pre-movement testing requirements.

3.3 The rationale for considering the possible changes outlined in the call for views document (see below) is that we believe they could have a positive impact on disease control. They would also provide greater clarity to cattle keepers on their TB testing obligations and could enable a more efficient use of Government resources for tackling the bovine TB epidemic.

3.4 On the other hand, Government acknowledges that more frequent TB surveillance testing would increase the associated costs for some herd owners. There could also be increased seasonal demand for Official Veterinarians to carry out TB tests.

4. Responses

4.1 The majority of respondents supported introducing a simplified testing regime. Of the 13 organisations that responded, 10 supported the case for proceeding to a full consultation, none opposed and 3 responded in ways which were neither for nor against change. Of the 35 individuals that responded, 22 supported the case for proceeding to a full consultation, 3 opposed and 10 were neither for nor against. Most of those neither for nor against sought more details on impacts on farmers and costs to industry and Government before giving a final view.

4.2 The following is a representative selection of comments from individuals and stakeholder organisations on behalf of their memberships.

General Comments

4.3 The Country Land and Business Association (CLA) supported the proposal, agreeing that:

“... the current testing system operated in the HRA is complicated and in need of improvement..... Farmers need the ability to plan for tests and the greater flexibility there is the more helpful this will be to the industry. A more focused approach is needed to tackle TB in the HRA. Making herds low risk because of TB history and local epidemiology will mean less focus is put on them to then put more time into those of a high risk.”

4.4 A vet in supporting the proposal for a simplified regime commented:

“finally a TB control strategy that takes the needs of the producer into consideration! Regulations at this point are very difficult to understand and producers face heavy penalties if their tests are overdue. This often results in a mistrust of the regulatory authorities. A simplified, consistent testing strategy, alongside a robust badger control strategy, has to be the key to controlling this devastating disease.”

4.5 The National Beef Association (NBA) welcomed Defra’s strategy of seeking to improve the methods of identifying, and guarding against transmission of infection from TB-infected cattle, noting:

“... we acknowledge the need to control the disease and reduce transmission between cattle. We continue to believe that the reduction of TB in wildlife is vital.”

4.6 The Chartered Trading Standards Institute and the National Animal Health and Welfare Panel (NAHWP) agreed with the proposal but emphasised the criticality of regulatory compliance, stating:

“... emphasis must be placed on ensuring compliance with the rules. Where a producer can demonstrate compliance then earned recognition ought to be given, without compliance the strategy for GB will not be achieved.”

4.7 The NFU supported Defra’s view that the potential for a simplified testing regime should be explored, and agreed that it could bring positive disease control benefits and resource efficiencies for Government:

“...it is important however that in any future discussions Defra recognises that farmers must also benefit from any simplified changes. They must have confidence in the testing regime, and see cost benefits in how they manage their disease response.”

4.8 Other general comments included the suggestion that Defra communicates more clearly to farmers and vets the limitations of the skin test, especially in herds with recurrent and persistent infection. Their concern was that there would otherwise be greater resistance from the cattle industry to the measures on which the Department was seeking views.

4.9 Specific comments on the individual elements of the simplified regime are set out below.

A. Default six-monthly surveillance testing

4.10 The British Cattle Veterinary Association (BCVA), Dairy UK and other stakeholders noted that availability of resources for testing must be considered. The BCVA stated:

“...this will have benefits in terms of TB controls, removing infected animals at an earlier stage. There will however be an increased cost to both the government and the keeper. There will inevitably be an increased workload for the sub-contractors conducting the tests and it will have to be introduced in such a way that a sudden demand does not create a vacuum in the availability of testers.”

4.11 Dairy UK said:

“...consideration should be given to increasing testing capacity by lifting the requirement that tests can only be undertaken by vets and instead expanding eligibility to include suitably qualified persons.”

4.12 The Dartmoor Commoners' Council welcomed acknowledgement of the need for flexibility over timing of tests but remained concerned that the seasonality of testing would impact on vet availability and reactor removal.

B. Annual testing of low risk herds

4.13 The BCVA commented:

“... this is a logical step if we move to default six monthly testing. Using CHeCS herd accreditation in this way would work. It should however be emphasised that this suggestion could be taken to indicate that there would be a risk rating applied by government to every herd.”

C. Replacement of 60-day Short Interval Tests

4.14 The NBA disagreed with the replacement of 60-day Short Interval Tests by three-monthly testing in TB breakdown herds since this would lengthen the period during which herds remain under restriction. An individual respondent stated:

“... in the case of moving from 60 to 90 day tests, you have not even mentioned when farmers can restock. In my case being able to purchase stock is my business. A 60 day wait was bad enough but a 90 day wait would be crippling....”

4.17 The BCVA set out what it saw as the main pros and cons. It stated:

“... the plus side of this is that it minimises the desensitisation of the skin test and allows for a consistent timing of follow up tests and advanced planning. There may also be some cost savings to government. The down side is that farms will be kept under restriction for longer and since they cannot acquire replacements until after

the first short interval test there could be financial implications. This effect could be minimised by having the initial SI test at the current 60 day interval, then revert to the proposed 3-monthly testing regime.”

D. Adjustment of testing windows

4.18 The BCVA generally agreed that adjustment of testing windows to remove the need for some separate animal tests was sensible. However, it also pointed out that since tracing tests may be conducted at severe interpretation, there could be complications associated with animals at the same test having their results interpreted to different standards. It went on to say:

“...There will also be complications in the submission of these tests to SAM with the Tracing tests having to be submitted separately. This would be helpful for subcontractors in the case of Check tests and those triggered by slaughter house cases, which are particularly difficult to arrange, usually at very short notice and within a shortened window.”

E. Maintenance of pre-movement testing requirements

4.19 This was supported by most respondents, some suggesting that all cattle should be pre-movement tested. However, one farmer in the High Risk Area argued:

“... if most farms go to 6 month testing I think pre-movement testing should be seriously reconsidered as a policy ... In every county in the South West in the last 8 years TB has seen a big increase showing that this cattle to cattle spread policy has completely failed at a big cost to the farmer.”

5. Way Forward

5.1 We are grateful for the responses to the call for views, which provide a strong basis for further development of the ideas set out in our paper. We recognise that moving to less frequent surveillance testing for certain herds in the HRA on the basis of risk would bring benefits for those herds and government. We will therefore develop full proposals, covering a range of options, along with economic impact assessments, with a view to a future formal consultation.

Annex A: List of organisations that responded to our call for views

Animal Welfare Group

Born Free Foundation

British Cattle Veterinary Association (BCVA)

Chartered Trading Standards Institute

Country Land and Business Association (CLA)

Dairy UK

Dartmoor Commoners Council

National Animal Health & Welfare Panel

National Beef Association (NBA)

National Farmers Union (NFU)

RSPCA