



Department
for Environment
Food & Rural Affairs

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Bovine TB in non-bovine farmed animals: call for views

A summary of responses and next steps

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1. Introduction

- 1.1 This document provides a summary of responses to Defra's public call for views to gather evidence to inform future measures to tackle Bovine TB in non-bovine species which ran from 28 August 2015 to 20 November 2015. Defra received a total of 77 written or online responses to the consultation: 59 were via the Citizen Space portal and 17 were e-mailed to the BTB Engage mailbox. In addition, one response was received by post. These figures do not include three responses which were considered duplicates and not counted separately.
- 1.2 58 responses were from individuals or companies, including farmers and vets, and 19 were from sector organisations. The organisations are listed in Annex A.
- 1.3 This document is to provide a summary of the responses received. Copies of responses (except for those where respondents requested confidentiality) can be obtained from:

TB in non-bovines policy Team
Defra, Bovine TB Programme
Area 5D Nobel House
17 Smith Square
London SW1P 3JR

2. The purpose of the call for views

- 2.1 The purpose of the call for views was to gather evidence to inform future decisions that will:
 - Ensure that proportionate measures are in place to address the risk posed by TB in non-bovine species.
 - Enhance the sensitivity of TB surveillance in non-bovines.
 - Introduce stricter measures for TB breakdowns in non-bovine herds.

3. Proposed policy principles

3.1 The call for views document noted that the government's response to *M. bovis* infection in non-bovine species will be evidence-driven and proportionate to the risk, in order to target efforts in areas where risk management will make a real impact on reducing bovine TB incidence and spread. Based on those precepts, we set out our proposed principles for intervention in the case of farmed non-bovine animals. They are reproduced below:

- Primary responsibility for TB surveillance in live non-bovines should rest with the keepers of the animals.

- The current means of surveillance should continue, which for most species means TB reporting by private veterinarians and animal owners, supplemented for meat producing animals by statutory post-mortem examination.
- Where TB is suspected, APHA should apply movement restrictions, implement herd/flock testing where this is practically possible and, as necessary, cull reactor animals and dangerous contacts to clear infection and mitigate risk to other animals.
- Statutory provisions should be used to compulsorily slaughter non-bovine farmed animals in which bovine TB is believed to be present.
- Species-specific statutory compensation arrangements should exist for all non-bovine farmed species which are compulsorily slaughtered.
- In order to ensure good value for public money, compensation amounts should be designed to ensure all of the following: high levels of compliance with disease control measures; incentivisation of owners to manage their own disease risks; and protection of the economic sustainability of animal keepers' businesses.
- Maintenance of the evidence base on bovine TB in non-bovine species is the job of government – government should be responsible for the first cases (index case) identified in individual TB outbreaks, statistical reporting, and provision of information to animal keepers and private veterinarians
- The burden of regulation on non-bovine farm businesses and allied sectors should be kept to the minimum necessary to still achieve the government's long-term aim of completely eradicating bovine TB.

3.2 With these proposed policy principles in mind, we posed a number of questions. Each is reproduced below, along with a summary of responses received.

4. Responses to questions

Question 1: Are these the right principles?

Agree – 64%; Disagree – 20%; Other/Not answered – 16%

4.1 Whilst many - including the pig and deer sector bodies, individual vets and the British Veterinary Association (BVA) - broadly supported the principles, their responses urged caution from government. They highlighted what they felt to be specific considerations for specific non-bovine sectors (in particular pigs and deer), which needed to be considered. In particular, there were practical difficulties of testing some species (especially deer).

Question 2: Do you think the duty to report suspicion of TB in a bovine animal should also apply to non-bovine animals?

Agree – 84%; Disagree – 10%; Other/Not answered – 6%

4.2 Most respondents felt that this would be a necessary step to reducing the risk of TB spread and ultimately eradicating the disease. However, the pig sector was in favour of maintaining the current system of abattoir surveillance, which they felt was already proportionate and effective in identifying TB.

Question 3: How could Defra facilitate the development of voluntary surveillance and testing schemes for non-bovine animals?

4.3 An overwhelming majority of respondents felt that in order for voluntary measures to have any chance of being effective, these needed to be attractive to owners. Compensation based on market/live values was seen as the principal lever for this. There was concern throughout the sectors that the TB skin test was not fit for purpose for non-bovine species and that owners would only be persuaded to submit their animals to testing voluntarily if they had confidence in a test.

“If voluntary surveillance and testing schemes for non-bovine farmed animals are to prove effective they must have enough sign up. To that end, it is essential that schemes include species-specific statutory compensation, relevant protocols and criteria are agreed with each species sector and concerted promotional activity to raise and maintain awareness.” British Veterinary Association (BVA).

Question 4: Should the provisions introduced in October 2014 for camelids, requiring consent for TB testing and notification of results, apply to all farmed non-bovine species?

Agree – 61%; Disagree – 18%; Other/Not answered – 21%

4.4 Whilst the majority of respondents could understand that owners should be obliged to notify APHA of TB-positive results, they questioned why consent should be needed to test.

Question 5: Who should pay for statutory TB surveillance testing of non-bovine animals, and why?

4.5 The majority of respondents believed that Defra should pay for TB testing in non-bovines and questioned why this should be any different to the cattle sector. Moreover, the camelid sector bodies felt that the current flat rate of statutory compensation would need to be revised if they were to be successful in encouraging their members to undertake voluntary surveillance testing.

“Given the relatively low volumes of non-bovines and the risk of spreading of the disease it would be fair to make the testing costs level across all species. It is manifestly unfair to provide free testing to Bovines (in high numbers) plus market rate compensation and yet charge non-bovines. The potential cost of disease spread from non-bovines to bovines is considerably higher than bovines to non-bovines where camelids currently pay for the voluntary surveillance testing and also suffer from unfair/non-market rate of compensation.” The British Alpaca Society (BAS).

4.6 Respondents from across the various sectors highlighted what they saw as the anomaly that deer owners are currently required to pay for testing. The deer sector itself suggested that the largely-moribund ‘Deer Health Scheme’ should be revamped and incentivised to avoid any non-disclosure of TB-suspect cases.

Question 6: Should statutory compensation for compulsory slaughter be extended to all non-bovine farmed animals and, if so, how should the amounts be set?

Agree – 71%; Disagree – 12%; Other/Not answered – 17%

4.7 The majority of those in favour of extending compensation to all non-bovine species suggested some form of value-based compensation, whether market value or table/replacement value (i.e. as exists for cattle).

4.8 In respect of compensation for goats, both the Goat Veterinary Society (GVS) and the British Veterinary Association (BVA) suggested that government should look to introduce similar rates to those introduced in 2011 by the Welsh Government. Likewise, the deer industry referred to the compensation rates legislation introduced in October 2015 in Scotland, making the point that deer compensation rates in England had not been revised since 1989.

4.9 As part of its response, the British Alpaca Society (BAS) attached a review that they had commissioned into compensation options for alpacas slaughtered as part of the government’s TB Eradication Programme. Separately, a number of owners suggested that, whilst a flat rate amount could generally be acceptable, there should be scope for a tiered compensation system – for example, where the animals are providing the main income stream for the owner.

Question 7: Should keepers of meat producing non-bovine farmed animals have the opportunity to secure for themselves a salvage value individually negotiated with a slaughterhouse operator for compulsorily slaughtered animals?

Agree – 55%; Disagree – 16%; Other/Not answered – 29%

4.10 Although most respondents agreed with the principle of owners being able to seek salvage value, this was not always seen as practical (in the case of llamas, for example). The pig sector responses explained that pig carcasses found to have suspected TB lesions are frequently totally condemned at slaughter, so there would be no opportunity for salvage payments to be obtained in those circumstances. In cases where partial condemnation takes place e.g. head-only 'condemnation', payment could be paid on the remainder of the carcass.

Question 8: Should government vary compensation for compulsorily slaughtered non-bovines, to reward good behaviours or penalise bad practices? If so, how?

Agree – 53%; Disagree – 23%; Other/Not answered – 24%

4.11 Whilst the majority of respondents agreed with this proposal, some felt that it would be difficult to know where all the good or bad practice was happening and to administer and enforce a reward system.

“Would Defra really have the resource available to be able to determine compensation rates on a case by case basis and to establish a protocol and guidance in the first instance? Surely this would be very subjective and open to abuse depending on the individuals involved”. The National Pig Association (NPA).

Question 9: Do stakeholders agree that this approach [to companion and zoo animals] is proportionate and targeted to the risk? If not, what more needs to be done?

Agree – 49%; Disagree – 17%; Other/Not answered – 34%

4.12 Just under half of respondents agreed that the approach advocated in the call for views was proportionate but more than one third did not give a view.

4.13 Biaza – the sector body representing over 100 zoos in GB and Ireland – thought that there should be a discrete consultation with the zoo industry before any significant changes were made in respect of zoos.

“There is no policy on unvalidated species testing, a lack of consistent exit strategy guidance for BTB infected collections and local APHA support, and follow-up and support from local offices is often slow or prolonged with an inability to answer questions with local officers and a continual need to operate through head quarters.” Biaza.

Question 10: Do you have further information/evidence that can help inform the development of any/all of the veterinary risk assessments?

As well as the report commissioned by the camelid industry on options for TB compensation, there were a number of specific comments on the contents of the veterinary risk assessments (VRAs). Some sectors suggested there was undue emphasis placed on the potential for their owners to spread TB.

Although the comments on the VRAs are not listed in this document, we are considering them along with the other responses.

5. Next steps

The call for views was intended to help Defra gather evidence to help make informed proposals on future TB controls in non-bovine species. We would therefore like to take this opportunity to thank respondents for their responses.

We are carefully considering the information provided. We intend to launch a formal public consultation on specific proposals later in 2016. We will be meeting key industry groups prior to the launch of the consultation.

If any individuals or organisations feel they have additional evidence to support the development of our consultation proposals please send them to:

btbengage@defra.gsi.gov.uk.

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

Organisations

1. British Alpaca Society (BAS)
2. British Deer Farms and Parks Association (BDFPA)
3. British Llama Society (BLS)
4. The British and Irish Association of Zoos and Aquariums (BIAZA)
5. British Pig Association (BPA)
6. British Veterinary Association (BVA) (a joint response with the BVA's Veterinary Policy Group - which includes representatives from the British Cattle Veterinary Association, Pig Veterinary Society, Sheep Veterinary Society, Veterinary Deer Society and the British Veterinary Zoological Society)
7. British Veterinary Camelid Society (BCVS)
8. Central Association of Agricultural Valuers (CAAV)
9. Chartered Trading Standards Institute*
10. Country Land and Business Association (CLA)
11. Dairy UK
12. Goat Veterinary Society (GVS)
13. National Animal Health and Welfare Panel*
14. National Farmers Union (NFU)
15. National Pig Association (NPA)
16. Pig Veterinary Society (PVS)
17. Provision Trade Federation (PTF) – Goat Dairy Trade Sector (responded via both Citizen Space and BTB Engage)
18. RSPCA
19. Association of Show and Agricultural Organisations (ASAO)

(*Submitted by the same respondent)