



Animal &
Plant Health
Agency

Animal and Plant Health Agency
Access to Information Team
Woodham Lane
New Haw
Addlestone
Surrey
KT15 3NB

enquiries@apha.gov.uk

www.gov.uk/apha

Our Ref: ATIC2159

[REDACTED]
{By Email}

07 October 2020

Dear [REDACTED]

PROVISION OF REQUESTED INFORMATION

Thank you for your request for information Whole Genome Sequencing (WGS) which we received on 8 September 2020. Your request has been handled under the Environmental Information Regulations 2004 (EIR)..

The information you requested and our response is detailed below:

1. “Are Whole Genome Sequencing studies being carried out in relation to badgers and reactor cattle in each respective Tb area of Wales and/or on farms where badger intervention is in progress?”

There has been a single study carried out in the Gower region of Wales. Routine Whole Genome Sequencing of cattle and badger isolates has started, but results are not due to be reported to keepers until 2021. More routine detailed analysis of this data awaits the further development of APHA processes (see below).

2. If yes, please could you include the data in your response?

These data are not being released at this stage, because the data will be included in a future publication. This data has been excepted from release citing Section 12.

With reference to question 2 this work is in its early stages. The information has been excepted from release citing regulation 12(4)(d) of the Environmental Information Regulations 2004 (EIR).

If a request relates to material that is still being completed, unfinished documents including drafts, or incomplete data, you can refuse to provide the information under regulation 12(4)(d).

This exception requires a Public interest Test please see below;

Public Interest Test

APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.

The EIRs apply to requests for environmental information, which is a broad category of information defined in regulation 2 of the EIRs. Public authorities are required to handle requests for environmental information under the EIRs. They give similar access rights to the Freedom of Information Act 2000 (FOIA).

Regulation 12(4)(d) of the EIRs relates to material that is still in the course of completion, unfinished documents and incomplete data. In respect of these data, APHA and external bodies are still in the process of finalising the work. It is APHA's intention to publish the data as soon as possible after the aforementioned has concluded.

In applying this exception, we have had to balance the public interest in withholding the information against the public interest in disclosure. APHA recognises that there is a public interest in understanding the work of Government and the accountability there may be. We also understand that information in relation to bovine TB surveillance in cattle and wildlife is an extremely debatable subject and providing such information would show the transparency of Government decisions. However, releasing information before all of the data has been collated and verified and reports have been fully reviewed and finalised would likely mislead the public, if they have to be revised as part of the process. This includes establishing whether any further work is necessary before drawing the data to a close. This would not be in the public interest. Moreover, as mentioned above, APHA will be publishing in due course and so there would not be any further public interest to be served by early disclosure of the information which will be available to all interested parties in due course.

Given the importance of publishing only appropriately collated and quality checked data, it is reasonable to expect that this information should be published in line with accepted practice rather than disclosed before official publication.

3. Will WGS data of badgers and cattle be published in a formal report? If yes, what is the intended date of publication?

It is not yet known when the WGS data on badgers and cattle will be published in a formal report

“I have observed that there was a sharp increase in NHI in Intermediate TB Area North (Wales) during 2017, 2018, followed by a corresponding increase (6.25%) in confirmed btb in Badgers Found Dead during 2019, 2020 where there had been zero btb in badgers in previous years. It follows that the isolates 17a and 22a have spilled over from the cattle population.”

The data quoted for confirmed TB in Badgers Found Dead is incorrect in stating % positive figures prior to and after 2017 in the Intermediate TB Area North.

	2005-2006	2014-2016	2017-2020
--	-----------	-----------	-----------

Number sampled (with a result)	30	68	81
Number positive	2	2	4
% positive	6.7%	2.9%	4.9%

4. Please provide historic WGS data for both cattle and badgers in Intermediate TB Area North.

Attached are the figures requested. The cluster identifications included in the data e.g. B6-11 are APHA cluster nomenclature, part of the ongoing development process. Relative similarity can be inferred from the same cluster name. However, processes in development over the next few years will be aimed at providing in depth analysis to determine how close each isolate within a cluster is to each other i.e. the number of Single-Nucleotide Polymorphisms (SNPs) apart. This will enable us to maximize discriminatory power even at the local or within-farm level. Further development is ongoing on analysing and validating this data to routinely generate home-range maps, decision trees and genotype analysis through software pipelines. Once this developmental work is completed, we are hoping to then fully benefit from this technology in further understanding the transmission pathways between badgers and cattle and vice versa.

5. Please provide the reports for SE3290 and SE3292, both projects concluded several years ago.”

APHA are actively assessing and seeking approval for the publication of SE3290 final report. SE3292 was significantly delayed in progress, with project outcomes and finances linked to ongoing projects due to conclude mid-2021, we will seek approval for associated publicly accessible final report publication when concluded.

Section 12

As these data are not yet finalised, the information is therefore being withheld at present because it falls under the exception in regulation 12(4)(d) of the EIRs.

Regulation 12(4)(d) of the EIRs relates to material that is still in the course of completion, unfinished documents and incomplete data. In respect of these data, the Animal and Plant Health Agency (APHA) and external bodies are still in the process of finalising the work. It is APHA’s intention to publish the data as soon as possible after the aforementioned has concluded.

Public Interest Test

In applying this exception, we have had to balance the public interest in withholding the information against the public interest in disclosure. APHA recognises that there is a public interest in understanding the work of Government and the accountability there may be. We also understand that information in relation to bovine TB surveillance in badgers is an extremely debatable subject and providing such information would show the transparency of Government decisions. However, releasing information before all of the data has been collated and verified and reports have been fully reviewed and finalised would likely mislead the public, if they have to be revised as part of the process. This includes establishing whether any further work is necessary before drawing the data to a close. This would not be in the public interest. Moreover, as mentioned above, APHA will be publishing in due course and so there would not be any further public interest to be served by early disclosure of the information which will be available to all interested parties in due course.

Information disclosed in response to this EIR request is releasable to the public. In keeping with the spirit and effect of the EIR and the government's Transparency Agenda, this letter and the information disclosed to you may be placed on GOV.UK, together with any related information that will provide a key to its wider context. No information identifying you will be placed on the GOV.UK website.

An Annex is attached which explains the copyright that applies to the information being released to you and contact details should you be unhappy with the service you have received.

If you have any queries about this letter, please contact the Access to Information Team at the email address below. During the current Coronavirus outbreak, our offices will be closed.

Yours sincerely

ACCESS TO INFORMATION TEAM

Email: enquiries@apha.gov.uk

Annex

Copyright

The information supplied to you continues to be protected by copyright. You are free to use it for your own purposes, including for private study and non-commercial research, and for any other purpose authorised by an exception in current copyright law. Documents (except photographs or logos) can also be used in the UK without requiring permission for the purposes of news reporting. Any other re-use, for example commercial publication, would require the permission of the copyright holder.

Most documents produced by APHA will be protected by Crown Copyright. Most Crown copyright information can be re-used under the [Open Government Licence](#). For information about the OGL and about re-using Crown Copyright information please see [The National Archives website](#).

Copyright in other documents may rest with a third party. For information about obtaining permission from a third party see the [Intellectual Property Office's website](#).

Complaints

If you are unhappy with the service you have received in relation to your request, you may make a complaint or appeal against our decision under section 17(7) of the FOIA or under regulation 11 of the EIRs, as applicable, within 40 working days of the date of this letter. Please write to the Access to Information Manager at the address at the top of this letter or email enquiries@apha.gov.uk and the team will arrange for an internal review of your case.

If you are not content with the outcome of the internal review, section 50 of the FOIA and regulation 18 of the EIRs gives you the right to apply directly to the Information Commissioner's Office (ICO) for a decision. Please note that generally the ICO cannot make a decision unless you have first exhausted APHA's own complaints procedure. The ICO can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Coronavirus

However, following the changes to Government advice, from Tuesday 24 March 2020 the ICO offices will be closed. They will therefore not be able to collect correspondence sent via post. Where possible, they ask that you [contact them online](#) or call on 0303 123 1113