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Welsh Government Consultation

A Refreshed TB Eradication Programme

Background

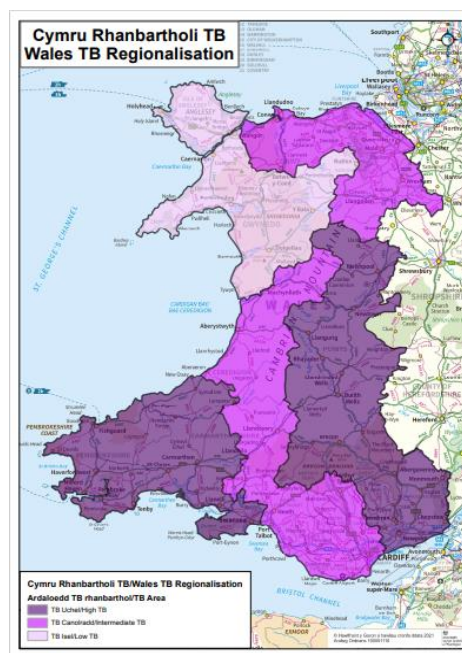
The following is a short briefing covering the Welsh Government TB Eradication Programme [statement](#) and [consultation](#) issued by Welsh Government on the 16th November 2021.

Welsh Government Statement: 16th November 2021

Welsh Government (WG) highlight that it has been four years since the launch of the regionalised approach to the TB eradication programme. WG say that good progress has been made since the programme was first established with long term decreases in incidence and prevalence. They highlight a 48% decrease in new TB incidents since 2009, they say that this demonstrates that the Programme is making a real difference to farming families and businesses.

WG are currently tackling spikes in disease in the North Wales Low and Intermediate TB Areas. WG state that they will be phasing out the badger trap and test work in persistent herd breakdowns, the funding saved from the badger trap and test work will go into badger vaccination, £100,000 will be made available via a Grant scheme. WG continue to support the development of a deployable cattle TB vaccine, with a test to differentiate infected from vaccinated animals to be in place by 2025. The Minister launched a 12-week consultation, the key proposals and consultation questions are summarised in this briefing.

The Wales TB regionalisation map can be seen below:-



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All Wales Badger Found Dead Survey

Since September 2014, bovine TB in badgers found dead have been monitored. Of the 1,818 badger carcasses tested, 144 (7.9%) of badgers were positive for M.Bovis, this varies from 0.4% in the Low TB Area to 18.6% positive in the High TB area East.

The 2021 Welsh Labour Manifesto had the following sentence - *We will not allow the culling of badgers to control the spread of TB in cattle.*

TB Testing

When considering TB testing it is important to be aware of the sensitivity and the specificity of the test.

Sensitivity- the likelihood a test will identify an infected animal as positive to the test.

Specificity- the likelihood a test will detect an uninfected animal as negative to the test.

If a test is not sensitive enough it will miss too many infected animals, while if it is not specific enough it will produce too many false positives. There is a trade-off between sensitivity and specificity, as one is increased, the other falls. With the regards to the TB Skin Test at Standard Interpretation, it has a sensitivity of 81% (range 50-90%) and a high specificity of 99.98% (1 in 5,000 false positives). A sensitivity of 80% means 2 in 10 infected animals are not identified as positive by the test.

WG Proposed areas for change – Testing

A. Legal Requirement for farmer paid PrMT from herds in Low TB area

A Pre-Movement TB Test (PrMT) is not currently required in the Low TB area but movements into the Low TB area from higher TB areas require a Post Movement TB test (PoMT). The current rules have been in place since 2017 but recent epidemiological analysis has recognised local movements in the Low TB area as contributing to spread of disease.

Do you agree with this proposal?

Cattle entering the Low TB area from a higher incidence area need a clear PrMT. Do you agree cattle moving into the Low TB area from a higher incidence area should also require a PoMT on arrival?

B. Legal requirement for farmer paid PoMT for all cattle movements to holdings in the intermediate TB areas from high TB areas, the High Risk Area and N. Ireland

WG say this would be introduced to protect the disease status of Intermediate TB areas and ensure they meet targets the WG has set for their eventual integration into the Low TB area. They say this will identify disease earlier in herds which have made riskier purchases; and discourage purchases from higher TB incidence areas.

Do you agree cattle moving into the Intermediate TB areas from higher TB incidence areas should have a PoMT?

C. Explore the introduction of farmer paid PoMT for cattle movements from an identified TB hotspot, or an identified high risk herd dispersal

WG propose a PoMT to be temporarily introduced for cattle moving from emerging TB hotspots or from the dispersal of a high-risk herd. It is proposed that PoMT would be used infrequently and exist on a temporary basis.

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Do you agree with WG exploring the temporary introduction of PoMT of cattle originating from an identified TB hotspot or high-risk herds?

Where do you feel this policy would have the most impact? (e.g. High, Intermediate or Low TB areas)

D. Not allowing a herd clearing test as a PrMT as we do in persistent herd breakdowns

The clearing test is the test to determine if a herd can be released from restrictions. WG propose the clearing test can no longer be used as a PrMT (this is currently policy for persistent herds only). A further clear test would be needed for animals over 42 days, before a movement from any post-breakdown premises is allowed. A PrMT cannot take place for at least 60 days post the clearing test.

Do you agree with this proposal?

Where do you feel this policy would have most impact? (e.g. High, Intermediate or Low TB area, or in specific circumstances).

E. What alternatives exist with regards which test(s) can be used for PrMT?

WG is considering options for the test used for the PrMT and PoMT. There are a number of options; the status quo (standard skin test), severe skin test, gamma test and/or IDEXX test. Any change will reveal a range of consequences depending on the test used. WG state there is a strong case for increasing the sensitivity of PrMT, with the trade-off being a reduction in specificity.

Do you agree with the statement “the test used as a PrMT should be more sensitive and therefore more likely to identify truly infected cattle but acknowledge this would be at the expense of identifying more false positive Cattle?”

Do you acknowledge that if blood testing (gamma or IDEXX) testing is deployed as a PrMT, there may be an additional cost to testing, which could not be met by Government?

F. Legal requirement for farmers not to move cattle between test day 1 (day of injection known as TT1) and test day 2 (TT2) and between blood testing and receiving results

There would be an exception for any clear testing animal moving direct to slaughter, or a slaughter gathering under licence; and for any animal licenced by the APHA

Do you agree with the proposed approach?

G. Consent to collect a sample for the purposes of TB testing or perform a test on a sample

Currently no person may perform a TB test on a bovine animal except with the written consent of WG and that person must report the results immediately to WG. It is proposed to expand this to include sampling and testing on samples taken.

Do you agree with this approach?

Informed Purchasing

Bought in cattle can be a source of new infection. The consultation says that to eradicate TB, keepers need to take greater responsibility for managing this risk. In the Low TB Area 80% of breakdowns can be attributed to cattle movements, in the High TB Area around 1/3rd of breakdowns are primarily the result of movements. Informed Purchasing guidelines aim to encourage the provision of information about the TB testing history of the animal and the herd it comes from at the point of sale.

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Proposed areas of change – Informed Purchasing**A. Adding a new map to ibTB showing the number of years unrestricted cattle herds have been officially TB Free (OTF)**

ibTB (<https://ibtb.co.uk/>) is an interactive map showing the locations of all TB breakdowns in cattle herds in Wales and England over the last 10 years. Currently ibTB shows the location of herds under restriction or have had a breakdown in the last 10 years. WG propose to explore the possibility of adding a new map to ibTB to show the number of years currently unrestricted herds have been Officially TB free.

B. Mandate provision and display of TB information at point of sale

WG say there is the option to mandate the provision and display of TB information at the point of sale. This would mean Market operators clearly displaying information on an electronic screen. For private cattle sales information would need to be provided to the buyer in advance. The information may include details of any TB breakdowns, date of animal's PrMT, date of herds last routine test and accreditation status.

Do you agree with the proposals outlined?

In the future do you believe there should be implications for cattle keepers who fail to take notice of TB information, and make a purchase regardless of highlighted risks? What do you believe the implications should be?

Payment for TB affected Cattle

Welsh Government say the cost of the existing system is unsustainable in light of the available budget. The TB Programme Board looked at a range of options and recommended 3 options to be considered further. The current legislation requires payment to be calculated on the market value of each individual animal, this is carried out by a contracted valuer. Reductions to payments for keepers are made in certain circumstances, WG say the current process only effectively discourages breaches.

WG say in regards to providing incentives for cattle owners to proactively manage a TB breakdown, there is currently little obvious financial incentive other than to discourage movement of animals on to a holding under licence (50%). WG say a more effective way of incentivising positive behaviour would be to make it clear to cattle owners what actions they could take to proactively manage the TB breakdown on their holding.

WG proposes to link TB payments to implementation of disease prevention and control practices. What are your views?

Welsh Government say they have overspent on the final budget for TB payments since 2015-16, this diverts funds from other areas. Efforts to improve sensitivity of the test will likely result in more animals being slaughtered. WG say they have also lost EU funding for the TB Programme.

The Welsh Government aims for new TB payment regime are for a system that is: -

- Fair and proportionate to cattle keepers
- Reflects financial resources available
- Encourages best practice whilst also providing disincentives for non-compliance

Payment for TB affected Cattle - Options**A. Table valuations as per current English system**

DEFRA uses average market prices to calculate compensation for cattle culled because of TB. There are 51 categories based on age, sex, pedigree status, type (beef or dairy). The information is updated monthly based on sales data of around 1.5m cattle collected each year. WG say this would save around £5.1m, it would be easy to understand and administer and reduce cost of valuers fees

B. Table valuations with an increase to payment based on membership of an approved animal health accreditation scheme

TB payments would increase by 10% of the table valuation if the owner can demonstrate they were registered with an approved animal health accreditation body. Being a member of an approved accreditation body would mean meeting a set standard on farm biosecurity and good farming practice. WG say this would mean a saving of approximately £4.3m

C. Payments to be determined by an industry led independent group. An industry levy would partly fund TB payment costs

TB payments would be determined by an industry led independent group (but within clear parameters set by Government). This would be funded partly by Government and partly by a new beef and milk levy – details of this would need to be explored.

Do you agree / disagree with any of the 3 proposals?

Are there any other proposals that you feel should be explored?

Other proposed areas of change**Explore prohibiting feeding of unpasteurised milk to livestock on OTFW premises**

There have been cases where groups of young calves been identified with TB in digestive tracts suggesting ingestion of infection. Invariably this is associated with feedings cow's milk from the bulk tank. Keepers are currently advised not to feed raw cow's milk to calves, it is proposed to amend the TB Wales order to prohibit the feeding of raw cow's milk to calves in OTFW breakdowns.

Do you agree with this proposal?

TB and Non-Bovine Species**A. Explore consolidation of the legislative requirements for sheep and pigs into the Tuberculosis (Wales) order 2011**

WG say this would bring sheep and pigs into line with deer, goats and camelids. Few sheep and pig breakdowns occur annually in Wales. It would give powers to WG around taking tests and samples, slaughtering suspects, and compensation arrangements.

Do you agree with this approach?

B. Identification of non-bovines for TB testing purposes

It is proposed that the keeper of a deer, alpaca, guanaco, llama, or vicuna must mark or identify a non-bovine in a manner approved by the Welsh Minister, this would be for TB testing purposes only.

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Do you agree with this approach?

Governance

A. TB Eradication Programme Board

Currently there is a TB Eradication Programme Board, chaired by the CVO it includes representation from the Farming industry, Veterinary profession, Academia, APHA and WG.

Do you agree with the role and representation of the TB Eradication Programme Board?

B. Regional Eradication Boards

There are 3 Regional TB Eradication Boards. Their aim is to monitor and understand the TB picture in their area, input into policy development, develop new ideas and deliver a co-ordinated and concerted approach to eradicating TB from their region. The Boards are made up of keeper volunteers and organisation representatives.

WG are seeking views on the most appropriate approach to involve stakeholders in the Programme Governance structure to: -

- Reinvigorate stakeholders appetite to engage
- Strengthen links between Government and Industry
- Contribute constructively to new policies – recognising and respecting Government priorities and red lines
- Facilitate and streamline key messages and flow of information
- Review and consider issues that could impact on the TB programme
- Review progress
- Opportunities for new stakeholders to engage

WG believe a publicly appointed TB stakeholder group, similar to the current Animal Health and Welfare Framework Group could do this.

WG recognise that there are other options, some of these may include: -

- Maintain Regional Boards but readvertise
- A single publicly appointed board for whole of Wales
- Two publicly appointed Boards – North and South
- Programme Board only / Liaise with representative organisations

Do you agree with any options outlined above?

Do you believe there is an alternative approach?

C. Establish a Technical Advisory Group

The Group would report to the programme board and consider technical issues for example cattle vaccination and TB diagnostics. Membership of the group would include experts in their fields from academia and industry.

Do you agree with this proposal? If so, please suggest scientific disciplines which could add value to the programme.

NFU Cymru Initial Response

NFU Cymru issued an initial response to the Minister's statement and launch of the consultation that can be accessed [here](#).

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In summary we believe that Welsh Government's perception of 'good progress' is contrary to the experiences of Welsh farmers especially when you consider nearly 100,000 cattle slaughtered due to bovine TB in a little over a decade. The disease remains one of the main barriers to the Welsh agricultural industry realising its aspirations and potential. NFU Cymru believe that Welsh Government policy measures see politics, all too often, override the science.

We are supportive of the regionalised approach and agree there is a need to consider the opportunities that new tests and diagnostics could play. NFU Cymru welcomed the trap and test approach as a step forward, phasing this out is clearly a major step backwards. Welsh Government appears to be unique in its thinking that this disease can be eradicated without proactively dealing with diseased animals in both cattle and wildlife populations.

We believe the development of EID Cymru to include a cattle element could play an important role with regards to informed purchasing. An issue that comes up time and time again is the poor communication between farmers and government with regards to bovine TB. Most importantly, we believe it is absolutely vital the farmer's own vet has a far greater input into the management of the TB breakdown.

NFU Cymru categorically rejects any move to tabular valuations. Compensation arrangements must reflect the value of the animal's individual merits, and this can only be achieved via an individual valuation. The payment of compensation for a TB reactor does not cover consequential losses.

The only way to reduce any overspend that government may have is to ensure that the disease is controlled quickly and effectively. The fewer animals that need to be slaughtered as a result of bovine TB, the lower the compensation bill and the lower the cost for both Government and industry.

Next Steps

NFU Cymru will be seeking views from our Members over the coming weeks. We would very much value your views and input to help inform our response to this important consultation. Please attend one of our upcoming county meetings that will be advertised on our weekly e-mail update and on our [website](#). Alternatively please [e-mail](#) your comments to us by **Monday 31st January** to help inform our response.

We would also encourage you to submit your own response to Welsh Government by e-mail to bovinetb@gov.wales or by visiting the Welsh Government [website](#). The closing date for responses is the 8th February 2022.

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