

Department for Environment, Food and Rural Affairs

Bovine TB: Proposed enhancements to bovine TB cattle control measures: tackling cattle-to-cattle transmission

A summary of responses to the consultation exercise and way forward

October 2014

Contents

1. Introduction	1
2. The proposals	1
3. Responses to proposals	2
Annex A: List of organisations and sectors that responded to our consultation exercise.....	6

1. Introduction

1.1 This document provides a summary of responses to Defra's public consultation on proposals for new cattle measures to tackle Bovine TB. The consultation ran from 11 June 2014 to 11 July 2014. Defra received 62 written or online responses to the consultation, of which 42 were from individuals, including farmers and vets, and 20 were from organisations. The organisations are listed in Annex A. 10 respondents requested that their comments be treated as confidential.

1.2 The purpose of this document is to provide a summary of the responses received. Copies of responses can be obtained from:

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

2. The proposals

2.1 Bovine TB is the most pressing animal health problem in the UK. It is a devastating disease which threatens our cattle industry and presents a risk to other livestock as well as wildlife species (such as badgers), pets and humans. The government remains determined to tackle bovine TB by all available means, including through enhanced cattle control measures

2.2 In line with the "Strategy for Achieving 'Officially Bovine Tuberculosis-Free' Status for England", in developing new cattle controls we aim to strike a balance between robust disease control aimed at achieving official bovine TB free status for England and helping to maintain a sustainable livestock industry.

2.3 The proposed new TB control measures are based on sound disease control principles and would build on changes introduced in 2012, 2013 and earlier this year. They would also reinforce the accelerated bovine TB eradication programme that we are obliged by European law to maintain. The proposals are:

- Abolish from 1 October 2014 the current TB pre-movement testing exemption for movements within Sole Occupancy Authorities (SOAs).
- A call for views on whether cattle keepers should be legally required to provide the TB history of their herd when selling stock.
- A call for views on compulsory post-movement testing of cattle (that are not going for slaughter) moved from herds in the annual testing areas of England and Wales to herds in the Low Risk Area (LRA) of England.

2.4 We also used the opportunity of the consultation to give notification that, from January 2015, we aim to extend the cross compliance rule for overdue routine TB surveillance and check tests to other TB tests.

3. Responses to proposals

Proposal 1: Abolish the TB pre-movement testing exemption for movements within Sole Occupancy Authorities (SOAs)

3.1 The majority of respondents, including vets and farmers, were supportive of the measure from a disease control perspective. However some commented that any change would be a new burden for business and that the measures would not address the disease reservoir in wildlife.

3.2 Two options were put forward on how the proposal could be delivered:

- Option 1 – Remove the pre-movement testing exemption for cattle moved within SOAs. However, AHVLA would be able to licence movements without pre-movement tests where all premises included in the SOA are within 10 miles of the main farm.
- Option 2 – Remove the pre-movement testing exemption for cattle moved within SOAs with pre-movement testing required for all movements from the High Risk and Edge Area.

Support Option 1 – 64.5%; Support Option 2 – 14.5%; No change/status quo – 13%; Not answered – 8%

Main issues

3.3 The following points and assertions were made by several respondents:

- Unnecessary burden to test animals when moving to neighbouring rented land.
- Each individual case should be risk assessed.
- Disease reservoir in wildlife needs to be addressed before further cattle control measures are introduced.
- Adequate handling facilities are not necessarily available on outlying grazing land to ensure safe handling of cattle.
- The present freedom to move cattle to and from SOA premises within 10 miles, subject only to recording the movements, should remain.
- Having a "short-distance" exemption retained within the revised rules would be a pragmatic solution.
- SOAs are vital for cattle owners throughout England. Farmers who use them must be able to continue to keep and manage their livestock without having disproportionate costs transferred to them.

- Many dairy farms are set up to have non-milking animals away from the main farm. It would almost be unworkable to limit the movements between these separate sites.

Way forward:

Most respondents accepted that this proposal would bring disease control benefits. And most supported Option 1 which they felt was a proportionate and more practical way forward. Some stakeholders also highlighted the need to minimise the additional red tape when licensing movements within SOAs where pre-movement testing would not be required. We have taken these concerns on board.

On 1 October 2014, the pre-movement testing exemption for cattle moved within SOAs was removed; at the same time a general licence was published at <https://www.gov.uk/government/publications/general-licence-for-the-movement-of-cattle-within-sole-occupancy-authorities>. This general licence - which allows cattle to be moved within SOAs without a pre-movement TB test - is available to all SOA operators whose SOA holdings are all less than 10 miles from the main farm. Farmers will not need to apply for the licence but must ensure that they meet the criteria set out in it. Defra has written to SOA operators it believes are affected by the new legislation.

Proposal 2: A call for views on whether cattle keepers should be legally required to provide the TB history of their herd when selling stock.

3.4 This proposal was supported by the majority of respondents.

Agree – 66%; Disagree – 23%; No comment – 11%

Main issues

3.5 Many respondents highlighted the benefits of providing information on a herd's TB history when selling cattle - in particular that it would enable farmers to make informed and risk-based decisions when purchasing stock.

3.6 Those who opposed the proposal suggested it could create a two-tier market system and disadvantage those farmers in the High Risk Area. Three respondents said that such a system would not be useful unless the TB reservoir in wildlife was also addressed.

3.7 In their response the NFU said that their members in the Low Risk Area supported the proposal but those in the High Risk Area had concerns. The NFU also said that information should be available for individual animals, or batches of animals, rather than a holding:

- *“For this proposal to work, the amount of time the animal has spent on the holding it is moving from must be declared and displayed. For batches of animals, this should be*

the animal in the batch lowest number of days on the last holding. This information is essential to prevent the treatment of all animals in the annual testing area as high risk and the consequent devaluation that happens for all animals as a result.”

3.8 The BVA/BCVA also supported the proposal but commented that government should clarify exactly what information sellers would have to provide; and that in relation to a herd’s breakdown history, the important date is the one on which the last OTF-W notice was removed. In addition, the BVA/BCVA said:

- *“It is also important to bear in mind the limitations of the information, since the restrictions that are being asked about only refer to the herd that the animal being sold is currently a part of. The whole herd could have been purchased 3 months previously from the dispersal of a herd that has just been derestricted following 10 years of TB restrictions, making the current owner’s declarations irrelevant. There is a need for a national database that allows real-time capture of data and interrogation such that the risk is carried with the animal.”*
- *“The proposals do not include any reference to sanctions that would apply for providing misinformation if compulsory disclosure was introduced. We ask that this be included in future consultation.”*

Way forward:

We will consider these and other issues raised in responses and work with stakeholders to develop specific proposals for formal consultation.

Proposal 3: A call for views on compulsory post-movement testing of cattle (that are not going for slaughter) moved from herds in the Annual testing areas of England and Wales to herds in the Low Risk Area (LRA) of England.

3.9 The majority of respondents supported this proposal.

Agree – 63%; Disagree – 21%; No comment – 16%

Main issues

3.10 This was well supported with some pointing out that the approach in England would mirror Scotland’s, give a better disease picture across the UK, and minimise the geographic spread of the disease.

3.11 One respondent said that the whole country should be on annual surveillance testing and subject to both pre and post-movement testing. Another respondent offered up an opposite view stating that, whilst not entirely disagreeing with the proposal, cattle are already pre-movement tested and with the test not being 100% reliable, spot-checks on

regular purchasers might be more cost effective. And a further respondent stated that they would support post-movement testing if it was carried out 60 days following the pre-movement test. The Tenant Farmers' Association favoured annual testing for the whole of the country.

3.12 In line with responses to the other proposals, some who opposed this measure suggested that no amount of testing will prevent the spread of the disease if the wildlife reservoir is not addressed. Others felt that the existing pre-movement testing requirements were sufficient. One respondent stated that a more reliable skin test was required first. Another issue raised was excessive testing, particularly the cost and time implications of that.

3.13 The Association of Show and Agricultural Organisations opposed the proposal saying it would be a new cost and nuisance to those that attend shows on an irregular basis and impractical for those who attend shows professionally, due to the 60 day time gap needed between tests.

3.14 The NFU supported the proposal, but with a caveat:

- *“Many NFU members, especially in the Low Risk Area strongly favour this approach which would improve safeguards against cattle transmission. Farmers in the Edge Area have reported a stigma attached to breeding animals from annual testing herds and have expressed legitimate concerns that an increased testing requirement for purchasers (along with potential for a breakdown) would increase this further, making it difficult for them to do business. It is essential that the mixed picture of risk in the Edge and High Risk Area is better communicated to avoid this stigma and that any changes are introduced hand in hand with full access to risk based trading information.”*
- *“There are views that there should be a requirement to test cattle that move on to a holding and off again within 60 days to avoid dealers “shifting on” and that the requirement should extend to animals moved under 42 days of age, however both these points must be tempered by the need to facilitate valuable services such as calf collection centres.”*
- *“This change is favoured by many NFU members and it is clear that we need to understand the full impact of this change both on the finished, store and breeding trade.”*

Way forward

Post-movement testing in the LRA was identified as a possible new measure in our TB Eradication Strategy. In the light of the response to our call for views we are now considering possible next steps.

Annex A: List of organisations and sectors that responded to our consultation exercise

Organisations

Norfolk County Council Trading Standards

Farmers' Union of Wales

University of Oxford

IFAW – International Fund for Animal Welfare

CLA

RSPCA

Livestock Auctioneers Association

Humane Society International UK

Association of Show and Agricultural Organisations

North East Dairy Board

Wales TB Eradication Boards

Chartered Institute of Ecology and Environmental Management

NFU Scotland

Tenant Farmers Association

BVA-BCVA

NFU

Dairy UK

Individual responses were also received from:

Livestock keepers and rural businesses

Private veterinary surgeons

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Any enquiries regarding this document should be sent to us at:

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

Or email to:

bTBengage@defra.gsi.gov.uk