Number: WG29767

Welsh Government
Consultation Document

A Refreshed TB Eradication Programme

Date of issue: 18 October 2016
Action required: Responses by 10 January 2017

Overview

This consultation provides details on proposals to refresh the TB Eradication Programme. This includes establishing a regional approach to tailor different control and prevention measures in the near future.

How to respond

The closing date for responses is 10 January 2016. You can respond by post to:

TB Team
Office of the Chief Veterinary Officer
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

By email to: bovinetb@wales.gsi.gov.uk

By visiting our website:
https://consultations.gov.wales/consultations/refreshed-tb-eradication-programme

Other languages and formats

This document is also available in other languages and formats (such as large print and braille) on request. Please telephone us on 0800 5283300 or email bovinetb@wales.gsi.gov.uk to request your copy. It will take approximately two weeks for your copy to be prepared and to arrive with you.

Data protection

How the views and information you give us will be used

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the

public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Glossary

A glossary of terms used in this consultation can be found at Annex B

Foreword by the Cabinet Secretary

One of the long-term goals of the Welsh Government is to eradicate bovine TB from Wales. Since taking on my role I have been determined to do everything I can to eradicate this disease which has a significant financial and social impact on farm businesses and the wider rural community. It is a disease which is also very costly to Government in terms of payment for TB testing and compensation to keepers whose animals are slaughtered because of TB. Bovine TB is a zoonosis which means it can be transmitted from animals to humans. Although the risk to public health is kept low because of regular testing of cattle, milk pasteurisation and inspections at abattoirs, we must do everything we can to mitigate against any threat of bovine TB to the public.

Over the last few years there has been some progress towards achieving our goal, with a downward trend in new TB incidents. In 2009, before annual testing was introduced, there were 1,186 new TB incidents. Last year there were 837 incidents which is a reduction of 29%. Over the same period there has been a 31% reduction in the number of cattle slaughtered because of TB. The progress made under the current strategy has been promising, but I am looking to speed up the rate of progress to achieve our ultimate goal and to set some ambitious targets.

With almost seven years of annually testing all cattle herds under our belt, we have built up an extensive dataset showing the true picture of disease across the country. We know TB incidence and prevalence are not uniformly distributed throughout Wales and our team of veterinary professionals within the Animal and Plant Health Agency (APHA) has identified different patterns of disease across the country. The outcome of this work has allowed us to gain a better understanding of the key risk factors involved in each of the areas and I feel it is now appropriate to adopt a more targeted approach to tackling disease in different areas, based on the four basic principles of infectious disease control (keep it out, find it fast, stop it spreading, stamp it out).

Our current strategic framework for TB Eradication in Wales comes to an end this year and I see the regionalised approach to TB eradication being central to our refreshed TB Eradication Programme. The measures to be deployed in each of the areas will be key to success and I am keen to seek stakeholder's views on our proposals. There are a number of other future plans aimed at tackling the disease in cattle included in this consultation.

I see stakeholders as key in shaping, steering and delivering our future approach to TB eradication. Following the consultation and consideration of all views and other relevant information I intend to publish a refreshed TB Eradication Programme in the spring of 2017.

Lesley Griffiths, Cabinet Secretary for Environment and Rural Affairs
October 2016

Where we are now

We established the TB Eradication Programme in 2008 to carry out our long-term goal of eradicating bovine TB. It is a comprehensive approach aimed at dealing with all the sources of TB infection:

- Cattle
- Non-bovines such as llamas and alpacas
- Wildlife including badgers and deer.

The main components of the programme are aimed at limiting and mitigating against the spread of infection by cattle. This includes surveillance and control measures which are designed to identify infected cattle as early as possible and minimise the risk of the disease spreading. Up to 2008, the testing frequency of herds ranged between annual testing and four-yearly testing and was determined by the proportion of herds in each parish which had previously been infected. During TB Health Check Wales (HCW), we tested all cattle herds in Wales over the course of a 15 month period (October 2008 to December 2009) to give us a better understanding of the disease situation across the country. We found the disease was present in areas where herds were previously tested once every four years. As a result of the findings of TB Health Check Wales, the annual herd TB testing regime was introduced to maintain a high level of surveillance. Cattle are also required to have a Pre-Movement Test (PrMT) before they can be moved from a Welsh farm (although there are some exemptions). This situation has remained the same across Wales since January 2010 regardless of the regional disease situation.

In 2012 we published our Strategic Framework for bovine TB Eradication which set out our agenda for achieving eradication. This included improving the management of long running breakdowns, making information available on cattle herds affected with TB and changing the compensation system to promote best practice. It also included carrying out a badger vaccination project in the Intensive Action Area (IAA) in south west Wales which is an area which has one of the highest rates of TB in the United Kingdom. After four years we successfully administered more than 5,500 doses of vaccine.

The disease picture

Since the TB Eradication Programme began in 2008 we have seen some progress towards achieving our goal with a downward trend in the number of new TB incidents. The monthly figures for 2008 to June 2016 are as follows.

Figure 1: New TB Incidents.

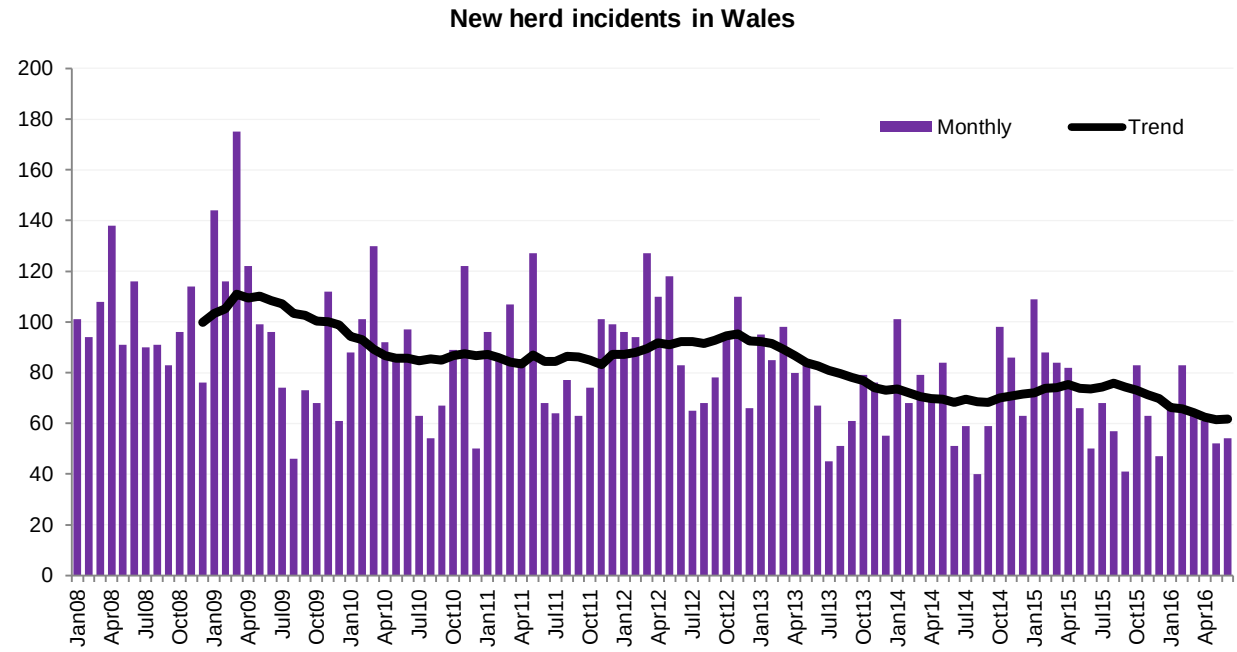


Figure 1 shows that new herd incidence (which peaked in 2008 at 1,198 new incidents) has fallen. Source: Defra monthly TB statistics as at 14 September 2016

Figure 2: Cattle slaughtered because of TB.

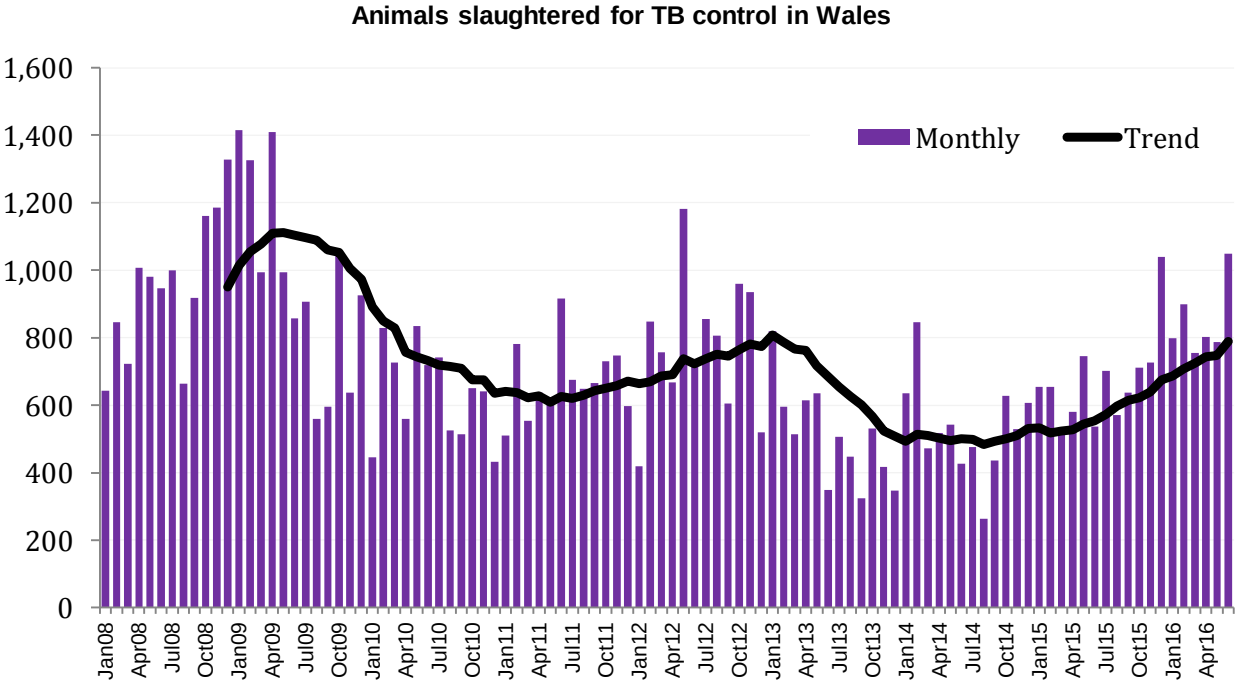


Figure 2 shows the number of cattle slaughtered because of TB peaked in 2009 (11,671 in the calendar year) before dropping off substantially in 2013 and subsequently turning upwards once more. This increase is primarily the result of our recent changes to our cattle controls which are intended to improve how we detect and eliminate disease within herds (for example the number of interferon-gamma (IFN-γ) blood tests increased by 40% between 2014 and 2015). Source: Defra monthly TB statistics as at 14 September 2016.

Reasons for change

Our current Strategic Framework for bovine TB Eradication in Wales comes to an end in 2016. Over the course of the last 4 years, a great deal of information on the disease in Wales has been gathered. This is the appropriate time to take stock of the current measures and consider new and enhanced methods of combatting the disease in order to develop the next phase of the TB Eradication Programme.

The outcome of the work of the Epidemiology Team within APHA is allowing us to gain a better understanding of the varying levels of disease across Wales and key risk factors. This will enable us to adopt more targeted approaches which complement our national controls. In some areas of the country, in particular north-west Wales, the current surveillance and control measures have been successful in preventing the disease becoming established. The priority for this area is to prevent the disease being introduced through the movement of undetected infected cattle. In other areas of the country the disease has become endemic and it is difficult to eliminate from areas where cattle and wildlife are both infected and can infect each other.

TB tends to affect dairy and beef farms differently. The reasons for this are unclear but dairy herds tend to be larger and more complex and the intensification and housed management potentially increases spread within the herd due to shared airspace, feed and water troughs. This can result in infected animals remaining in the herd and environmental contamination which leads to cattle being exposed to constant infection. As well as this it is difficult to control and eliminate disease within large herds split over multiple sites due to the high level of intra-herd movements. Beef suckler herds on the other hand tend to be smaller, farmed less intensively and are under a lower production pressure. Beef finishing animals are usually fed a high energy diet (usually indoors) but tend to be younger animals which are quickly fattened and moved from farm to slaughter. The type of herds in each area of Wales has a big impact on the local disease situation.

By having a more regionalised approach it will allow us to:

- Apply different controls in different areas depending on the disease situation and risk in that area
- Set realistic targets by which each area can progress towards achieving Officially TB Free (OTF) status.

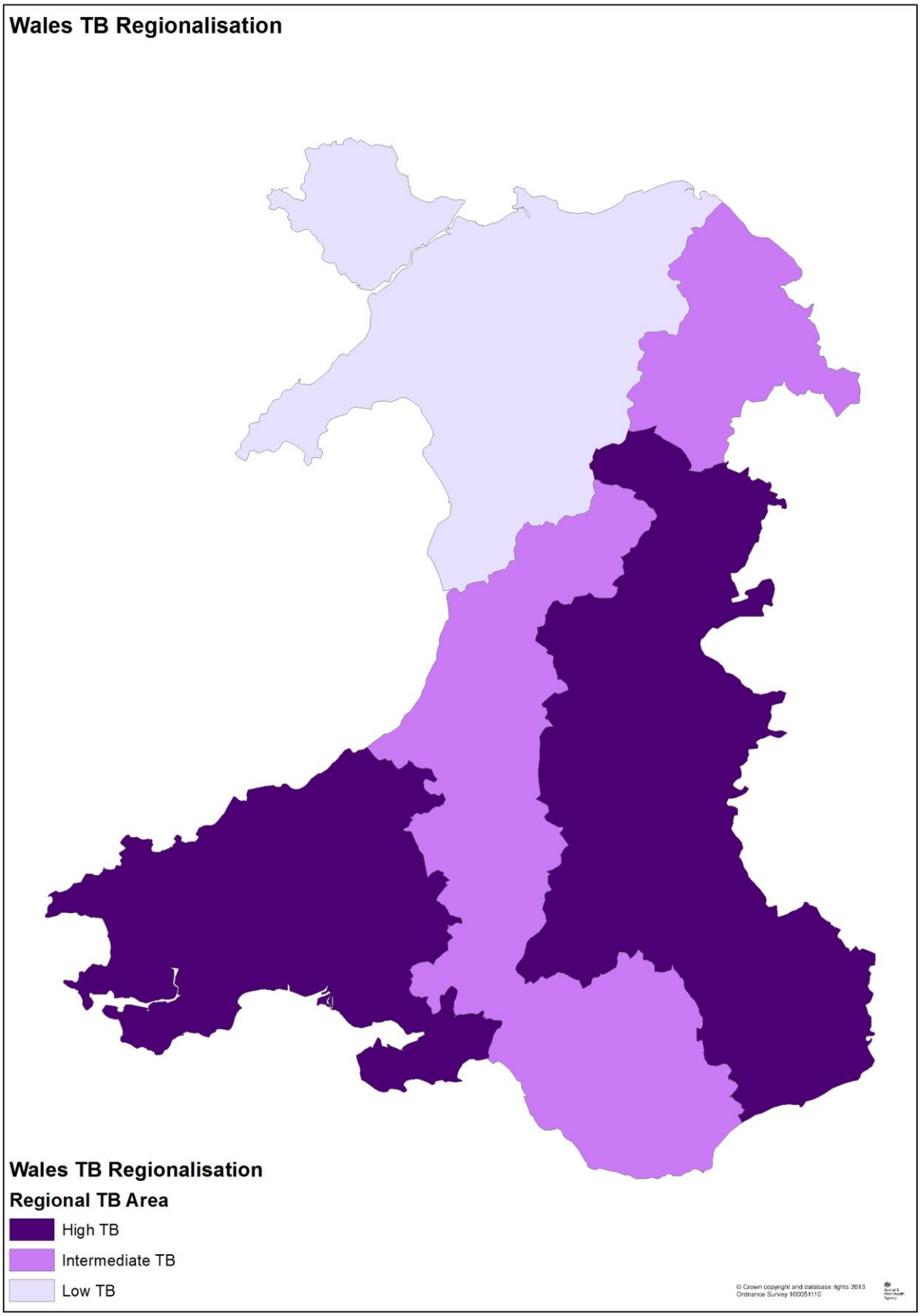
What we are proposing

Informed by the work of the Epidemiology Team, we believe Wales can be divided into three broad TB incidence categories: low, intermediate and high and the different areas will be designated accordingly. The criteria for each area are:

- Low TB Area: The area where less than 0.2% of herds have had a TB incident in a year.

- Intermediate TB Area: The areas where less than 5% but more than 0.2% of herds have had a TB incident in a year.
- High TB Area: The areas where more than 5% of herds have had a TB incident in a year.

Figure 3: Regional TB Areas



The disease situation and risks are different in each of the areas. Having a regional approach will allow us to tailor different disease control and prevention approaches in each of the areas. This will include a new approach for TB testing based on risk. Annex A provides a basic summary of the proposed changes.

Low TB Area

Area description

The area is in north-west Wales covering the counties of Anglesey and Gwynedd and north-west Clwyd. The majority of the herds are beef herds with many producers purchasing store cattle and selling finished cattle. The majority of movements remain within the area.

The current disease situation

The area has a historically low level of disease and less than 0.2% of herds have had a TB breakdown[1] over the last six years. This is close to meeting the conditions for being designated OTF[2]. The evidence from the epidemiology project shows, of the few breakdowns which occur in the area, in the vast majority of cases:

- The disease does not spread to neighbouring herds;
- The disease does not spread significantly within herds;
- The disease does not tend to recur within herds after they become TB free.

What is driving the disease?

- Despite the occasional historic 'hotspot' the disease has not established in the area as it has in some other areas of the country.
- The majority, if not all, of TB breakdowns in the area are the result of undetected infection brought in through cattle movements.
- There is no recognised significant reservoir of the disease in the wildlife population. Only one positive badger found dead has been found in the area since November 2014.

What needs to be done?

- We need to protect the area from TB being introduced through cattle movements and to deal with new cases promptly and effectively. To do this we need to alter the cattle controls to make sure they are sufficient to prevent disease entering the area and to eliminate the low level of infection which exists.
- Keepers also need to take ownership of the disease situation to protect this area's favourable status, working towards elimination of TB.

[1] Excluding non-confirmed breakdowns and confirmed breakdowns which were attributed to cattle movements with no evidence of subsequent spread

[2] For a Member State or region to achieve OTF status as defined in Council Directive 64/432/EEC, the percentage of bovine herds confirmed as infected with tuberculosis must not exceed 0.1% per year for six consecutive years and at least 99.9% of herds have achieved OTF status each year for six consecutive years.

What we hope to achieve

- This area is the best candidate for meeting the conditions for being designated an OTF area. In fact, if there were six fewer breakdowns over the past six years it would currently meet the OTF definition.

Intermediate TB Area (North)

Area description

The area is located in north-east Wales and includes the part of Clwyd which is not included in the Low TB Area. The area has a high proportion of dairy herds and dairy cattle compared to other areas. Around half of all movements into the area are from the adjacent English counties (Cheshire and Shropshire) which are classified as 'High Risk Areas'. This is likely to be because these counties also have a high number of dairy herds as well as because some farms have land either side of the border.

The current disease situation

- The area is a "medium" disease area with around 2% of herds currently under restrictions because of TB.
- We have concerns the disease may become established.
- Breakdowns are generally short with few reactors, which is unusual for a predominantly dairy area with large herds. One reason for this could be the use of the IFN-γ tests to remove infected animals early in the breakdown.
- The area has a high proportion of repeat breakdowns within 18 months of restrictions being lifted compared to most of the other areas.

What is driving the disease?

The evidence suggests the majority of breakdowns are related to the movement of cattle into the area from endemic TB areas of Shropshire and Cheshire. This includes:

- The recurrence rate is relatively high and reintroducing the disease through cattle movements and purchases appears to be a major factor in breakdowns in the area i.e. breakdowns in the area are the result of movements/purchases.
- The majority of cattle moving into the area tend to go to farms where they will have a long stay.
- The TB genotype most commonly found in the area shares a home range with Shropshire and south Cheshire.
- The short length of breakdowns and low number of reactors suggests within-herd spread and infection pressure from badgers in the local environment is low.
- There is no recognised significant reservoir of the disease in the wildlife population – two positive badgers have been found in the area as part of the current (November 2014 – present) survey despite a high number of carcases submitted.

What needs to be done?

- We need to protect the area from TB being introduced through cattle movements from higher disease areas and to deal with the level of disease already there. To do this we

need to alter the cattle controls to make sure they are sufficient to prevent disease entering the area and to eliminate the infection which exists.
- Biosecurity on farms is important and badger vaccination could play a role to help prevent the disease becoming established in the badger population.

What we hope to achieve

- We anticipate, if the disease situation in this area improves, it is likely the Low TB Area will grow to encompass it, on the basis the disease level reducing to a comparable level.

Intermediate TB Area (Mid)

Area description

This area runs through the middle of Wales and comprises parts of Glamorgan, east-Carmarthenshire, north Ceredigion and north Powys. It is a predominantly upland area primarily containing small beef herds.

The current disease situation

- The area is a medium disease area.
- Around 2% of herds are currently under restrictions because of TB.

What is driving the disease?

- Cattle movement into the area appears to be a high risk factor for the introduction of TB;
- Many new breakdowns are found through contiguous testing which suggests TB is also being spread locally either by direct or indirect contact with neighbouring cattle or wildlife;
- Despite the area having some suitable habitats which allow badgers and other wildlife to thrive; only two positive badgers found dead have been found in the area since November 2014.

What needs to be done?

- We need to protect the area from TB being introduced through cattle movements from higher disease areas and to deal with the level of disease which is already there. To do this we need to alter the cattle controls to make sure they are sufficient to prevent disease entering the area and to eliminate the infection which exists there.
- Biosecurity on farms is important to protect from any local spread and badger vaccination could play a role to help prevent the disease becoming established in the badger population.

What we hope to achieve

- We anticipate, if the disease situation in this area improves, we can consider it becoming a Low TB Area, on the basis the disease level reduces to a level which is comparable with the existing Low TB Area.

High TB Area (West)

Area description

The area forms a rough triangle in the south west of Wales including Pembrokeshire and parts of Carmarthenshire, Ceredigion and Swansea. The majority of herds in the area are small beef farms. However there are more dairy cattle in total because the area contains a lot of large dairy herds. The area contains our Intensive Action Area (IAA) – an area where we have introduced a range of measures to reduce the level of infection within all species in the area.

The current disease situation

- TB has been in some parts of the area since the National Eradication Campaign started in 1935.
- It has one of the highest rates of TB in Wales with around 11% of all herds under restrictions because of TB, although this is down from 16% at the beginning of 2009.
- It is the area which has the most severe breakdowns in terms of length of time under restrictions and the number of reactors per breakdown.
- Many reactors have been Inconclusive Reactors (IRs) in the past.
- Our badger found dead survey has confirmed the presence of TB in a proportion of the local badger populations.

What is driving the disease?

- Dairy farming features highly and herds in the area are considerably larger than the national average.
- Local spread seems to be a significant factor in the area and this is supported by the significant number of new incidents disclosed by contiguous surveillance testing (31% in the IAA). This suggests there is a considerable infection pressure from outside the herd.
- For cattle moved onto holdings in the area, the majority originated from Carmarthenshire, Pembrokeshire and Ceredigion.
- There is a high number of recurring breakdowns which suggests either a high re-infection rate or infection which persists in the herd even after it is declared OTF.

What needs to be done?

Controls are necessary to tackle the ways in which the disease spreads within and between herds from the known sources of infection:

- Reduce the risk of infection spreading through cattle movements and from infected badgers;
- Find infected cattle as early as possible;
- Remove disease to stop it from infecting others within the herd and other herds;
- Stamp out disease so we are satisfied it is no longer present.

What we hope to achieve

- The short-term aim for this area is a reduction in the number of breakdowns and the severity of each breakdown (measured by the length of time under restrictions).

- Another short-term aim for this area is to deal with the number of 'chronic' herd breakdowns. These breakdowns include those which are persistent in terms of duration, but also include breakdowns with recurring infection.
- Over the longer-term if the disease situation in this area improves, we can consider it becoming an Intermediate TB Area, on the basis the disease level reduces to a level which is comparable with the existing Intermediate TB Areas.

High TB Area (Border)

Area description

The area runs along the border, from north Powys to Gwent. The majority of cattle movements are local, from within the area or from the neighbouring counties in England where TB is also endemic. The area has a large proportion of beef suckler herds.

The current disease situation

- TB is endemic in the area and it is the area with the highest number of new breakdowns.
- Around 7% of herds are under restrictions because of TB which is down from 10% at the beginning of 2009.
- The majority of breakdowns have a small number of reactors and last for less than a year, most likely as a result of it being a predominantly beef area. However there are a few herds, predominantly large dairy herds, with severe breakdowns which last for up to five years with some going beyond 10 years.
- A high proportion of herds have another TB breakdown within 18 months of coming off restrictions.

What is driving the disease?

- It is likely the high number of local movements result in the movement of undetected TB infected cattle.
- Recurrence is high within the area which may be a result of re-introduction due to re-infection or infection remaining within the herd after restrictions have been lifted.
- The percentage of TB breakdowns discovered due to contiguous testing is high and suggests local spread is occurring by direct or indirect contact (cattle and wildlife).
- The badger found dead survey has confirmed the disease is present in a proportion of the local badger populations.
- There is some evidence of a low level of infection in other wildlife such as deer and wild boar in east Monmouthshire.

What needs to be done?

Controls are necessary to tackle the ways in which the disease spreads, within and between herds, from the known sources of infection:

- Find infected cattle as early as possible;
- Remove disease to stop it from infecting others within the herd and other herds;
- Reduce the risk of infection spreading through cattle movements and from infected badgers;
- Stamp out disease so we are we are satisfied it is no longer present.

What we hope to achieve

- The short-term aim for this area is a reduction in the number of breakdowns and the severity of each breakdown (measured by the length of time under restrictions).
- Over the longer-term if the disease situation in this area improves, we can consider it becoming an Intermediate TB Area, on the basis the disease level reduces to a level which is comparable with the existing Intermediate TB Areas.

All Wales Badger Found Dead Survey

Since September 2014, bovine TB in badgers found dead has been monitored across Wales. Figures 4 and 5 set out the results of the All Wales Badger Found Dead Survey (including the Intensive Action Area (IAA) Badger Found Dead Survey figures). The results for September 2014 to end of October 2016 are:

Figure 4:

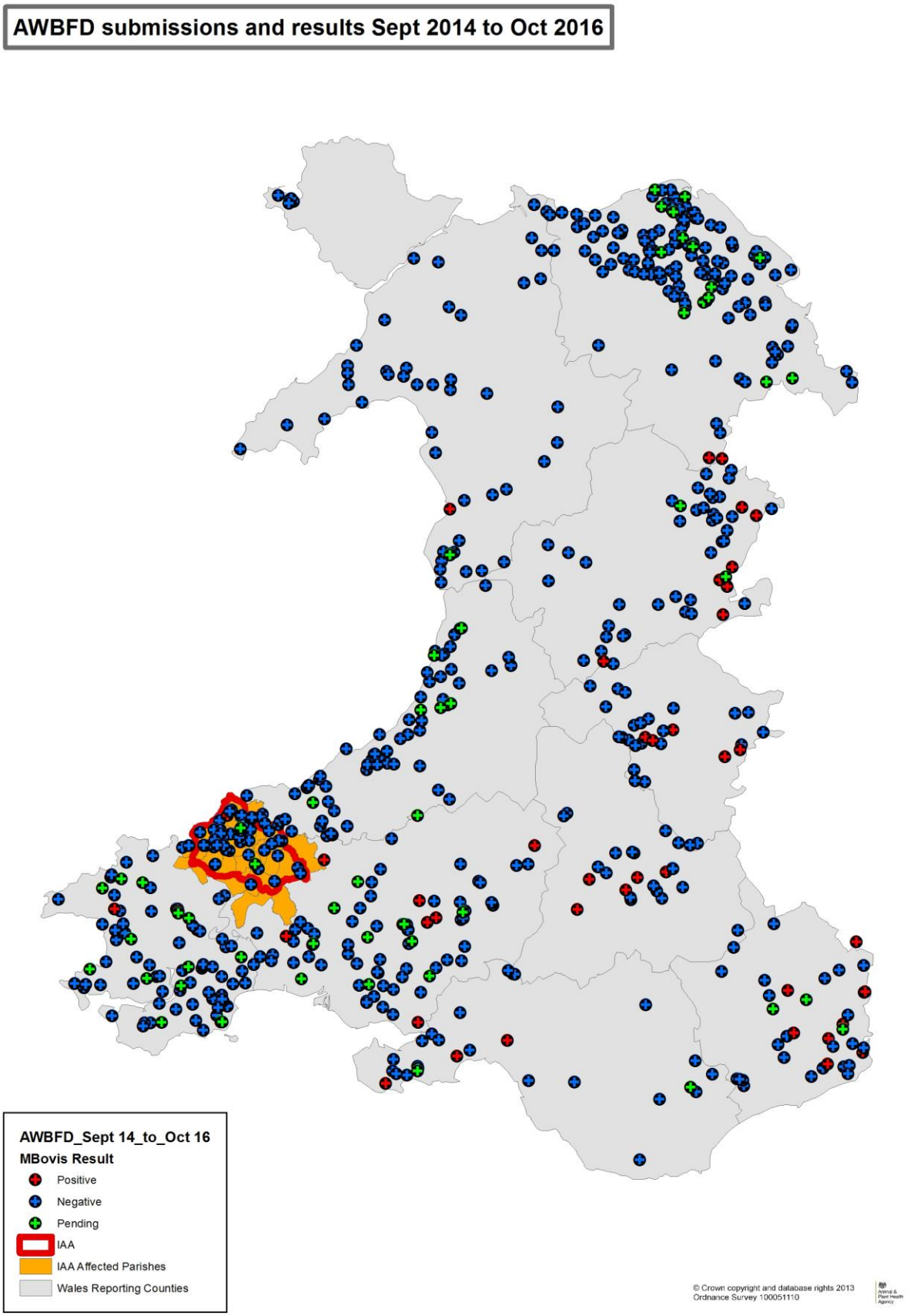
Number Collected and tested[3]	648
Number culture positive *M.bovis*	43
Number negative	550

Of the 648 badger carcasses tested 43 (6.6%) were positive for *M. bovis*. 55 results are pending.

Figure 5 over the page shows there are varying levels of infection in badgers in Wales.

[3] Excludes those unsuitable for testing.

Figure 5:



Proposed controls

Our approach for dealing with TB in each of the areas will be based on the four basic principles of infectious disease control:

- Keep it out – preventing disease spreading;
- Find it fast – finding infected cattle at the earliest opportunity before they have chance to infect others;
- Stop it spreading – promptly removing infected cattle and preventing the disease from spreading to other animals;
- Stamp it out – eliminating disease once infection has been found.

The controls in place in each of the areas will be complemented by our national controls and supporting measures. This more targeted approach allows us to tailor different disease control and prevention approaches in each of the areas:

Low TB Area

Keep it out	Find it fast	Stop it spreading	Stamp it out
Some of the PrMT exemptions will be removed so all animals moving into the area have a PrMT – cattle moved from or within the area will no longer require a PrMT.	Continue to test herds annually to make sure we catch disease at the earliest opportunity.	Inconclusive Reactors (IRs) at standard interpretation in OTFW herds are re-tested using the IFN-γ test, positive animals are removed and clear tested IRs will be restricted to their herd for the rest of their life.	IFN-γ testing will continue for the majority of breakdowns, to help us stamp out the disease within the herd thoroughly and quickly.
Cymorth TB visits for all keepers in the area will be offered and encouraged.	Cattle moved in to the area from a higher disease area will require a Post-Movement Test (PoMT).		
	High risk herds are identified by their risk factors and tested every six months.		
	Review the use of Exempt Finishing Units.		

Intermediate TB Areas

Keep it out	Find it fast	Stop it spreading	Stamp it out
Some of the PrMT exemptions will be removed so all animals	Continue to test herds annually to make sure we catch disease at	IRs at standard interpretation in OTFW herds are re-tested using	IFN-γ testing for the majority of breakdowns, to help us stamp out

moving in to the area have a PrMT.	the earliest opportunity.	the IFN-γ test, positive animals are removed and clear tested IRs will be restricted to their herd for the rest of their life.	the disease within the herd.
	Cattle moved in to the area from a higher or similar, but geographically separate, disease risk area will require a PoMT.	Encourage badger vaccination when vaccine becomes available.	
	High risk herds are identified by their risk factors and tested every six months.		

<u>High TB Areas</u>

Keep it out	**Find it fast**	**Stop it spreading**	**Stamp it out**
Work towards expansion of Cymorth TB to provide free bespoke veterinary advice to all herds in the area.	Whole herd tests will be done at six month intervals to find infection earlier.	More restrictive herd movement controls (both external and internal) will be used to reduce the chance the disease will spread within herds.	The IFN-γ test will continue to be used on an ad-hoc basis for new and chronic breakdowns.
Biosecurity Improvement Notices will be issued for all OTFW breakdowns in the area requiring keepers to improve their biosecurity in line with the requirements (guidance will be provided).		Removal of standard IRs as reactors in all OTFW breakdowns with clear testing severe IRs restricted to the herd for life.	IFN-γ testing is mandatory for OTFW breakdowns which had a breakdown in the previous 18 months and repeat IFN-γ testing will be used when high disease prevalence in management groups is identified.

Take appropriate interventions to break transmission routes of disease between cattle and wildlife.		The clearing test (which allows a herd to come off restrictions) will not be able to be used as a PrMT.	

Other proposals

Biosecurity

Good biosecurity and animal husbandry can reduce the risk of infection from cattle and wildlife. A key part of our TB eradication programme is to develop and promote improved biosecurity and husbandry practices.

We intend to develop a standardised online biosecurity package to assist keepers in taking forward and implementing improved biosecurity and husbandry practices. This will include guidance on biosecurity standards as developed and agreed with the industry and will be widely available. The Welsh Government has been involved in previous work in this area and has trialled various prototype tools to assess biosecurity. The standardised package will build on this work.

Compensation

We pay compensation to keepers for any animal we slaughter because of TB and in the last ten years we have spent almost £150 million on TB compensation alone. The Tuberculosis (Wales) (Amendment) Order 2016 came in to force on 1 April 2016 and provides us with the powers to reduce compensation for those keepers who have broken the rules. We made these changes to encourage herd owners to adopt and follow good farming and biosecurity practices and adherence with the rules. We intend to continue to encourage keepers to follow good farming practices and explore other ways in which compensation can be linked to implementation of good biosecurity and husbandry practices.

We also introduced a cap of £15,000 per animal on compensation payments. We currently receive between £2-3m in funding from the European Commission which will be lost when we leave the European Union. Because of this we intend to reduce the cap to £5,000 to make sure the valuation system is more financially sustainable. If the cap had been in place, in the last 12 months to April 2016, a saving of just under £300,000 would have been made and it would have affected under a hundred animals. The owners of high value animals would be encouraged to explore insurance to cover any value which is in excess of £5,000.

We understand there is a need for cattle to be moved onto a restricted farm for a number of reasons such as the welfare of the animal, to fulfil a contract and for breeding. In these circumstances APHA may licence a keeper to bring an animal into a herd after the first Short Interval Test (subject to a Veterinary Risk Assessment) but, in the event that the animal is then slaughtered because of TB before the herd becomes TB free, the compensation for that animal will be reduced. This allows the keeper to restock but means they also share the financial risk of bringing healthy cattle into a herd with a known TB problem.

We intend to extend this arrangement so compensation would also be reduced for cattle movements between units within the same herd where the breakdown has been open for 18 months or more or has had recurrent infection i.e. a chronic breakdown herd. The reason for

this is in many of our chronic herd breakdowns, the disease situation is complicated by the fact that they are located on multiple sites and there is a high level of intra-herd movements. This makes it difficult to eliminate disease because there is the continual movement of animals. The aim of this proposal is for the keeper to alter his/her business practices so that movements between separate units is kept to a minimum and, when they take place, they can be done with appropriate risk reduction measures with the aim of:

- Preventing lower disease status cattle being introduced to a management unit that has a known TB problem;
- Preventing cattle with a high disease status introducing disease to a management unit with a lower disease status.

Keepers who have a new TB breakdown would be informed that these rules will apply if they are still under restrictions after 18 months. Existing herd breakdowns will be given a period of time to change business practices to reduce the impact of this policy change.

We will also continue to review the TB compensation system to make sure it incentivises keepers to keep disease out of their herds. Future reviews will also need to take into account the loss of European funding as part of leaving the European Union.

Cross Compliance

Ensuring compliance with the requirements is key in ensuring the successful delivery of the TB Eradication Programme in Wales. Rural Payments Wales (RPW) already applies a percentage reduction to CAP scheme payments claimed by those keepers who allow their TB test to become overdue. Payments are reduced by 1, 3 or 5% depending on how long a test remains overdue. If an APHA enforced test is arranged or refused or more than one TB test is late the level of financial penalty will increase, up to a maximum of 100% of any CAP payments that are due to a keeper in any calendar year.

In line with other initiatives within our Programme to promote positive behavioural changes and adherence to the requirements, we propose to further link compliance with Common Agricultural Policy (CAP) scheme subsidy payments (or any other payment scheme that the industry receives subsidy from in the future).

It is proposed other breaches of the TB (Wales) Order 2010 (as amended) attract similar penalties for example where keepers:

- Fail to comply with the Pre-Movement Testing requirements;
- Fail to comply with the terms of a Veterinary Requirements Notice (VRN);
- Move cattle without an appropriate licence.

Finishing Units

An Approved Finishing Unit (AFU) is a unit which can take cattle from restricted and unrestricted herds. Exempt Finishing Units (EFUs) provide a route for beef producers to finish cattle. EFUs can accept cattle from OTF farms, which would normally need Pre-Movement Testing, without the animals being tested.

To prevent the movement of unrestricted animals in to the area, AFUs will continue not to be permitted in the Low Risk Area. To minimise the impact of untested animals moving in to the area we are considering two alternative requirements:

- EFUs will have to adhere to more stringent controls, for example six monthly testing; or
- EFUs will no longer be permitted in the Low TB Area and those EFUs currently authorised will have their authorities revoked (after a period of notice).

We will decide which option is more proportionate taking into account the feedback we receive as part of the responses to this consultation.

Non-bovines

The Tuberculosis (Wales) Order 2011 provides APHA with powers to deal effectively with incidents of TB in specified non-bovine animals – South American camelids (e.g. llamas and alpacas), goats and deer – similar to those available for cattle. These species are susceptible to *Mycobacterium bovis (M. bovis)* infection but the risk of infection and of them passing infection to cattle, wildlife or humans is generally considered to be low. We will, however, keep our current passive approach to surveillance of these animals under review as well as the possibility of extending the 2011 Order to cover other susceptible species such as sheep and pigs.

Informed Purchasing

Across Wales, bought-in cattle can be a source of new infection. If we are to eradicate TB, keepers need to take greater responsibility for managing this risk. To help with this we are encouraging "Informed Purchasing", which aims to provide keepers with information about the testing and disease history of an animal and the herd it comes from. By taking account of this information keepers can make a more accurate assessment of the TB risk level of cattle they are buying. For example, herds with a history of TB are around four times more likely to have a new incident than herds with no history of the disease and buying cattle from these herds represents more of a risk than buying cattle from herds which have never had TB.

Last year we established a grant to help livestock markets to upgrade their facilities to enable them to prominently display TB information of the cattle being sold. Ten applicants agreed our funding and the grant will be made available again to allow more markets to update their facilities.

To further support the Informed Purchasing project we have looked at how Risk Based Trading (RBT) supported the eradication of bovine TB from Australia and is contributing to the eradication of the disease in New Zealand. In the longer-term we intend to introduce a similar system based on the successful classification schemes used in these countries.

In Australia a mixture of geographical and herd risk measures were used. Areas of similar disease prevalence were set up and administered as separate units. Herds within these areas were classified on the basis of their health status (i.e. whether disease had been detected). If they had been clear for up to 8 years after the last reactor they would be classified as 'confirmed free'. RBT was mandatory i.e. herds could only sell to a herd of equal or lower TB status and confirmed free herds enjoyed premium prices and could also move to other geographical areas.

In New Zealand, where keepers are involved in the governance of TB, a voluntary RBT scheme was developed whereby every herd is given a risk score which classifies farms according to the number of years they have been clear (C1 through to C10). Herds adopt the lower status classification when cattle are bought from a herd with an inferior status. This creates a premium for disease-free cattle, rewarding keepers who stay clear of

disease, and incentivising disease control measures by creating a visible rating of a keepers' performance. Keepers are required to fill in a mandatory form at point of sale which asks them to provide their TB status.

In both countries, for RBT to work, information needs to be exchanged between sellers and buyers so they are aware of the herd's status and potential risk. It is the intention in the future to adopt a similar Risk Based Trading scheme in Wales, preferably on a voluntary but if necessary on a mandatory basis and in collaboration with the industry.

Governance

The TB Eradication Programme Board provides overall direction and management of the programme and monitors how it is being implemented. The Board is chaired by the Wales' Chief Veterinary Officer and includes representation from:

- Farming industry;
- Veterinary profession;
- Animal and Plant Health Agency;
- The Welsh Government.

In 2008 we established three regional TB eradication delivery boards which are made up of keeper volunteers and other local farming industry representatives.

We are proposing to realign the location and makeup of the boards to be consistent with the Regional TB Areas (High TB, Intermediate TB and Low TB Areas). We also propose to review the boards to make sure they are suitably responsible for communicating, advocating and supporting the delivery of the Eradication Programme in each region.

Consultation Response Form

What do you think?

We would welcome your comments on the proposals in this document. We would particularly welcome your responses to the following questions:

1. **Do you agree with any of the proposals set out in this document?** (please say what proposals you agree with and why you agree with them)

2. **Do you disagree with any of the proposals set out in this document?** (please say what proposals you disagree with and why you disagree with them)

3. **Do you have any suggestions about how the controls proposed in this document could be improved or how they could best work in practice?**

4. **Are there any other controls you think we should consider to help meet the aims set out in this document?**

5. **We have asked a number of questions relating to specific proposals. If you have any other comments on other aspects of the TB Eradication Programme, please set them out below.**

Your details

Your name:	
Your organisation (if applicable):	
Your address:	
Responses to the consultation will be made public in a report on our website. Would prefer your response to remain anonymous?	
Which one of the following best describes you? • Farmer/keeper • Farming industry representative or organisation • Livestock auctioneer • Member of the public • Vet • Wildlife organisation • Other	

Annex A – Summary of proposed changes

	Low TB Area	Intermediate TB Area(s)	High TB Area(s)
Surveillance testing	Annual (high risk herds – six monthly)	Annual (high risk herds – six monthly)	Six-monthly
PrMT	No	Yes	Yes
PoMT	Yes	Yes	No
Mandatory IFN-γ	New breakdowns	New breakdowns	Chronic breakdowns
Standard IRs (in OTFW)	Re-tested using IFN-γ, clear tested animals restricted to their herd	Re-tested using IFN-γ, clear tested animals restricted to their herd	Slaughtered as reactors
Severe IRs (in OTFW)	2 x IRs slaughtered as reactors	2 x IRs slaughtered as reactors	2 x IRs slaughtered as reactors, clear tested restricted to their herd
Breakdown management	No change	No change	Clearing test not to be used as a PrMT
Biosecurity Improvement Notices	No change	No change	OTFW breakdowns
AFUs	Not permitted	Indoor only	Indoor only
EFUs	Indoor only or not permitted	Indoor only	Indoor only
Cymorth TB	Breakdown farms (one off visit for all)	Breakdown farms	All farms
Badgers	Monitor the level of infection	Encourage vaccination (when available)	Explore and develop ways to break the transmission cycle between cattle and badgers where it can be demonstrated badgers are contributing to the problem in chronic herd breakdowns.

Annex B – Glossary

AFU – Approved Finishing Unit - an outlet for finishing clear tested cattle from TB restricted holdings.

Contiguous testing – Additional testing which takes place on herds neighbouring OTFW breakdowns to check if the disease has spread.

Chronic herd breakdown - A 'chronic' herd is defined as either a herd which is OTFW and:

- Has been OTFW for a duration of 18 months or longer, OR
- Became OTFW at or before the 12M check test, following an earlier OTFW breakdown, BUT excluding those recurrent breakdowns where all reactors are animals bought in since the close of the previous incident, unless subsequent molecular typing information does not support a purchased origin.

Cymorth TB – Support for TB affected cattle keepers.

EFU – Exempt Finishing Unit – EFUs provide a route for beef producers to finish cattle without the need for Pre-Movement Testing. Cattle must be sourced from an Officially TB Free herd.

Endemic - a disease which is constantly present to a greater or lesser extent in a population.

Genotype - The genetic constitution of an individual (in this case the genetic constitution of the *Mycobacterium bovis* bacterium).

IFN-γ – interferon gamma test - A laboratory-based blood test, for the diagnosis of bovine tuberculosis. The interferon gamma test can identify infected animals earlier in the infection process than the skin test and also some infected animals which are missed by the skin test.

IR – Inconclusive Reactor - An IR is an animal which has given readings to the tuberculin skin test between the clear (pass) and reactor (fail) ranges. Cattle can be deemed IR at:

- Severe – where a more strict interpretation of the results has taken place in order to increase test sensitivity in herds where indications are that infection is present.

- Standard – where the normal interpretation of the results has taken place due to no extenuating circumstances.

Officially TB Free Withdrawn (OTFW) – The TB free status of a herd is withdrawn when more than one reactor is found at a surveillance test or only one reactor is found but additional evidence suggests infection is present. OTFW herds need to have two clear consecutive TB tests for movement restrictions to be lifted.

PoMT / PrMT – Post-Movement TB Testing / Pre-Movement TB Testing.

Programme Board – Established in 2008, the TB Eradication Programme Board is responsible for the consideration and recommendation of strategic bovine TB control policies and oversight of its delivery in relation to Wales. Membership includes the farming industry, veterinary profession, APHA and the Welsh Government.

Regional Boards – Also established in 2008 there are three Regional Eradication Delivery Boards covering North Wales, South East Wales and South West Wales. The Boards ensure delivery of policy is specific to regional and local conditions and that it is implemented effectively. These regional boards integrate existing responsibilities and include representatives from APHA, the farming industry, veterinary profession, auctioneers, Local Authority Trading Standards and the Welsh Government.

TB restriction – Movement restrictions imposed on cattle and/or a holding as a result of finding evidence or on suspicion of TB infection.