



Welsh Government
Consultation Summary of Responses

A Refreshed TB Eradication Programme

February 2017

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Consultation on a Refreshed TB Eradication Programme – Summary of Responses

1. The Consultation Exercise

1.1 Background information

The Welsh Government established a TB Eradication Programme in 2008 to work towards our long term goal of eradicating bovine TB in Wales. The Programme aims to address all sources of TB infection including cattle, wildlife and non-bovine species. A key focus of the Programme was, and still is, to implement measures to prevent cattle spreading the disease and since the start of the Programme the cattle testing regime has been much intensified in order to find disease before it has chance to spread. Between October 2008 and December 2009, every cattle herd in Wales was TB tested as part of the TB Health Check Wales (HCW) initiative. This gave a “snapshot” of the disease picture across the country and provided the evidence to warrant a more rigorous routine TB testing programme. From January 2010, all cattle herds have been tested annually in order to maintain this high level of surveillance and all cattle, (subject to some exemptions), have required a clear Pre-Movement Test before they can be moved from a Welsh farm.

The Strategic Framework for bovine TB Eradication, launched in 2012, set out our agenda for action to be taken over a 4 year period. Included in the framework were actions to make information on cattle herds affected with TB publicly available, improving the management of persistent herd breakdowns, refreshing the TB compensation arrangements and implementing a badger vaccination project in the Intensive Action Area (IAA) in south west Wales.

While our programme to eradicate bovine TB in Wales continues in line with the UK TB Eradication Plan as approved by the European Commission, the Strategic Framework for bovine TB Eradication came to an end last year. With the aim of maintaining the impetus of our Programme, building on the comprehensive suite of measures already in place, whilst revisiting and enhancing key areas, Lesley Griffiths, Cabinet Secretary for Environment and Rural Affairs, announced in October 2016 that she intended to refresh the TB Eradication Programme. In her statement, she announced that Wales would be taking a more regional approach to TB eradication as part of the refreshed agenda and taking a robust approach to tackling chronic herd breakdowns. She also launched a 12 week consultation on a number of new key initiatives.

1.2 Consultation proposals

The consultation document set out a number of proposals to be included in a refreshed TB Eradication Programme with the intention to launch this long term direction and package of enhanced measures in spring 2017. The refreshed Programme will build upon and strengthen our approach to TB eradication in Wales.

- **Regionalised approach to disease eradication**

The consultation included proposed measures to be deployed in each of the TB areas:

Low TB Area

- Continuation of an annual TB testing regime and use of the gamma interferon (IFN- γ) test in the majority of breakdowns (mandatory IFN- γ testing for all new breakdowns).
- Cattle moved **into the Low TB Area** will require a Pre and a Post-Movement Test.
- All cattle moving **within or from the Low TB Area** will no longer require a Pre-Movement Test.

- Six monthly testing for some high risk herds (identified by risk factors).
- Offer and encourage a one-off Cymorth TB visit for all keepers in the Low TB Area. Cymorth TB visits will be offered in breakdown herds.
- Inconclusive Reactors (IRs) found at standard interpretation in Officially TB Free Withdrawn (OTFW) breakdown herds will be re-tested using the IFN- γ test (positive IRs will be removed, clear tested IRs will be restricted to the herd for life).
- Review the use of Exempt Finishing Units with a view to making them not permitted or indoor only.
- AFUs not permitted.
- Monitor the level of infection in badgers.

Intermediate TB Areas

- Continuation of an annual TB testing regime and use of the IFN- γ test in the majority of breakdowns (mandatory IFN- γ testing for all new OTFW breakdowns).
- All cattle moving **within, between and from** Intermediate TB Areas will require a Pre-Movement Test.
- All cattle moving **into** an Intermediate TB Area from a High TB Area or geographically separate Intermediate TB Area will require a Post-Movement Test.
- Six monthly testing for some high risk herds (identified by risk factors).
- IRs found at standard interpretation in Officially TB Free Withdrawn breakdown herds will be re-tested using the IFN- γ test (positive IRs will be removed, clear tested IRs will be restricted to the herd for life).
- Indoor AFUs and EFUs permitted.
- Cymorth TB visits offered to breakdown herds.
- Encourage badger vaccination when vaccine becomes available.

High TB Areas

- Six monthly Whole Herd Testing.
- All cattle moving **within, between and from** High TB Areas will require a Pre-Movement Test (no Post-Movement Testing).
- More restrictive herd movement controls will be used.
- The IFN- γ test will continue to be used on an ad-hoc basis for new and chronic breakdowns.
- 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.
- Removal of standard IRs as reactors in all OTFW breakdowns with clear testing severe IRs restricted to the herd for life.
- The clearing test that lifts TB movement restrictions from a herd will not be able to be used as a Pre-Movement Test.
- Biosecurity Improvement Notices (BINs) will be issued for all OTFW breakdowns in the area, requiring keepers to improve their biosecurity in line with the requirements.
- Indoor AFUs and EFUs permitted.
- Work towards expansion of Cymorth TB to offer free bespoke veterinary advice to all herds in the area.
- 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.

Other proposals

- Development of a standardised online biosecurity package.

- Introduction of a compensation cap of £5,000.
- Compensation reduction for keepers who wish to move cattle between units within the same herd in chronic herd breakdowns.
- Continue to review the TB compensation system.
- Further link compliance with CAP scheme (or future subsidy schemes) subsidy payments.
- Finishing Units Proposals to either subject Exempt Finishing Units (EFUs) to more stringent controls or to ban EFUs in the Low TB Area. AFUs to remain unpermitted in the Low TB Area.
- Retain, but review passive surveillance of bovine TB in non-bovines.
- Work towards introduction of an Informed Purchasing system similar to the Risk Based Trading System they have in place in New Zealand and that was in place in Australia.
- To revisit the governance of the TB Eradication Programme.

Respondents were asked to consider 5 questions in respect of these proposals:

1. Do you agree with any of the proposals set out in this document?
2. Do you disagree with any of the proposals set out in this document?
3. Do you have any suggestions about how the controls proposed in this document could be improved or how they could 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.

1.3 Respondents

The consultation attracted 993 representations from a variety of sectors including the farming industry, veterinary profession, livestock auctioneers, wildlife interests and members of the general public. 431 representations were petition like responses (constituting 4 different petitions).

Of the 562 individual responses received:

353 were from farmers/keepers
 24 were from farming industry representative/organisation
 52 were from vets
 17 were from livestock auctioneers
 2 welfare organisations
 17 wildlife organisations
 19 were 'other'
 32 were members of the public.
 46 were not given

Petition 1 – organised by an unnamed association – 160 signatures.

Petition 2 – organised by 'Welsh cattle producers' – 234 signatures.

Petition 3 – organised by 'finishers and procures of a large volume of store cattle based on the Isle of Anglesey' – 16 signatures.

Petition 4 – organised by an unnamed association – 21 signatures.

A list of respondents can be found at Annex 1. Some respondents requested that their responses/details not be published; accordingly these have been removed from the list.

A large proportion of the signatures on the petitions were illegible, therefore, those who submitted a petition-style response have also been excluded from the list.

2. Responses to the consultation

This summary focuses on comments made on the proposals as outlined above which would be part of a refreshed TB Eradication Programme. It provides a representative summary of the key issues raised by respondents on the consultation proposals and on other issues part of the wider TB Eradication Programme.

As the consultation requested views on a number of complex proposals, many of which are cross cutting, comments from respondents are included against proposals where they best fit. Due to the nature of the consultation, this summary cannot be an exhaustive record of all issues raised as part of this comprehensive consultation.

During the consultation process, many respondents sought clarification on the proposals and on other aspects of the TB Eradication Programme. There were also a number of misconceptions concerning the Programme emerging from the responses. Answers to the questions raised and Welsh Government responses to the misconceptions are outlined in Annex 2.

3. Changes already announced

As part of her statement on 18 October 2016, Lesley Griffiths, Cabinet Secretary announced that the Welsh Government would be refreshing its TB Eradication Programme this would include a new regionalised approach to TB eradication. The map depicting the new regions can be found at Annex 3.

Although the regionalisation of Wales for the purposes of the TB Eradication Programme was not subject to consultation, many respondents provided comments on the concept of splitting of Wales into 3 categories of TB Area as well as the demarcation of the areas. Comments on the regionalisation approach are outlined in section 4.

In October last year, the Cabinet Secretary also announced that ongoing action to target persistent and long standing TB breakdowns would be extended to recurrent breakdowns. So called 'chronic' herd breakdowns will have individual, bespoke action plans developed in partnership with the farmer, vet and the Animal and Plant Health Agency (APHA). In those chronic herd breakdowns in high incidence areas where it can be demonstrated that badgers are contributing to the problem, the Welsh Government will, in conjunction with vets and wildlife experts, develop ways to break the transmission cycle of the disease between the two species. Where evidence suggests badgers are contributing to the problem in chronic herd breakdowns in high TB incidence areas consideration is being given to cage trapping and humane killing of badgers.

Dealing with the disease in badger populations in Wales was part of the proposals to be included in each of the TB Areas;

Low TB Area – Monitor the level of infection in the badger population;

Intermediate TB Areas – Encourage badger vaccination (when the vaccine becomes available);

High TB Areas – 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.

4. General comments on the regionalisation of Wales for the purposes of the TB Eradication Programme.

Many respondents agreed that there was a need to take a regionalised approach to TB eradication due to the differing levels and drivers of disease across Wales. It was felt that there should be a flexible approach to setting the areas in order to reflect changes in the number of breakdowns, so that parishes at the edge can be moved to a lower classification or vice versa. Many respondents stipulated the need for a regular review of the areas to reflect changes in disease and risks.

Many agreed that more intelligent testing was required in each of the areas in order to protect the disease status of the lower incidence areas and to reduce disease in the higher incidence areas. Many agreed that it was crucial to protect the Low TB Area and to an extent the Intermediate TB Areas from the spread of disease through cattle movements. It was acknowledged by many who supported the regional approach, that managing businesses with farms in 2 or more TB Areas would be complex.

A number of respondents agreed with the regionalised approach, but that it should be balanced with effective implementation of a means to deal with infected badgers.

Many respondents also had concerns about taking a regionalised approach and did not agree with the demarcation of the areas or the terminology used to describe the areas.

Comments included:

- The approach is likely to cause confusion, particularly on the borders between areas and on the border between Wales and England. Some thought that trade, particularly between Wales and England could be impeded as a result of the changes. This would have knock on effects on markets and change market forces and prices for Welsh cattle.
- The approach will disadvantage farmers in the Intermediate and High TB Areas as there will be a perception that they are 'dirty' and they would receive less for their cattle than those in the Low TB Area.
- There was concern raised that farmers in the higher TB areas would not be able to sell meat and dairy products to supermarkets.
- There is a likelihood that trade would be inhibited and a 2 or 3 tier market could be created just within Wales.
- Many respondents referred particularly to the diminishing suckler cow industry and how the regionalisation approach would see its demise in Wales.
- Farmers who have spent years building up pedigree stock will be de-valued and farmers in the higher TB Areas will be stigmatised.
- The number of boundaries should be minimised.
- Livestock markets will suffer as a result of regionalisation.
- Farming in some areas of Wales could be seen as more expensive than others. This could have the unintended consequence in terms of succession and attracting new entrants to the industry.
- The Royal Welsh Agricultural Society (RWAS) states that the consultation document is unclear on the exact movement restrictions which will be adopted between areas and it has significant concerns over the ability of exhibitors to enter and show cattle at its three major events.

A number of suggestions for a different approach were put forward by a number of respondents:

- A consistent Wales-wide approach would be easier to understand and would be more practically deliverable.
- Wales is too small a country to be split when there is a TB problem across the whole of the country.
- Rather than a regional approach, focus should be given to individual farms.
- Use CHeCs to apportion herd risk when considering herd movements;
- The areas are too large – a parish level system should be adopted.
- All Wales should be designated a High TB Area.
- Wales should be split according to Animal Health region.
- The High TB Area should not protrude into the Low TB Area. Although there are few cattle in this area, the perception is wrong. The Intermediate Areas should be extended to create a buffer zone. Additionally drawing a boundary in Flintshire between Low and Intermediate is not reflective of the separation between beef and dairy herds in the area.
- There should only be 2 categories of TB Area; Intermediate and High. The Low TB Area should be classed as Intermediate as it would offer additional protection and provide less exposure for a future increase of disease in this area.
- Regionalisation is too vague. The altitude of the farm needs to be taken into account as well as past test results when establishing the most appropriate measures to be adopted on farms.

5. Measures to be included in a regionalised approach to TB Eradication.

5.1 Low TB Area

Continuation of an annual TB testing regime and use of the IFN-γ test in the majority of breakdowns

The general comments were supportive of this approach, in particular the extended use of the IFN-γ test in order to find infection quicker. However, some disagreed with increased use of the IFN-γ test to increase test sensitivity.

Cattle moved into the Low TB Area will require a Pre and a Post-Movement Test

There were mixed views received on Pre and Post Movement Testing of cattle moved into the Low TB Area.

Comments included:

- Post Movement Testing should not be imposed in the Low TB Area because if reactors are found it would result in contiguous testing which is expensive and time consuming. It is unnecessary as these herds will be Pre-Movement Tested at least 60 days beforehand.
- Agree that PoMT should be carried out as greater likelihood infection will be caught.
- Agree that PoMT should be implemented in the Low TB Area but cattle should be suitably quarantined while they are awaiting their test and results.
- The IFN-γ test could be used as the PoMT.

- PrMT for moves into area should reduce the risk of cattle translocating disease into the area. It would also raise awareness of buying cattle from higher TB areas.
- PoMT could have a detrimental impact on trade from the High TB Areas. Low TB Area farmers may not wish to buy from higher TB Areas due to the PoMT requirement. Exemptions could be given from PoMT if movements were from a lower risk herd within a higher TB area.
- Some raised concern about the potential impact on beef finishers in the Low TB Area who would have increased costs and practical difficulties in testing batches of animals on a more frequent basis. It was suggested that these herds could be tested at 6 monthly intervals instead.
- Many agree with the PrMT requirement for moves into the area from a higher area.
- Agree with PoMT in Low TB Area as it would reduce the risk of the introduction of TB.
- There were general concerns raised about how the additional testing would be funded, how Post-Movement Testing would be enforced and how soon after movement it would be required.

All cattle moving within or from the Low TB Area will no longer require a Pre-Movement Test

This proposal incited many comments. Most respondents disagreed with the removal of the Pre-Movement Testing requirement for cattle movements within or from the Low TB Area due to the fact that there are still herd breakdowns occurring in the area and the feeling that it is too soon to remove the requirement.

Comments included:

- Removal of PrMT requirement in Low TB Area is justified but sends wrong signal.
- Disagree with stopping PrMT as farmers will not be able to sell their cattle and is unwise given the number of movements in the area.
- Too early to stop PrMT for movements within Low TB Area because there have been breakdowns in this area in the last 12 months. Particularly because majority of breakdowns are due to cattle movements. Urge WG to not stop PrMT for moves within Low TB Area – should be maintained across Wales for at least a few more years when the TB incidence in Wales should hopefully be lower.
- Support removal of the PrMT requirement but most keepers will continue so that they are not disadvantaged in the market place.
- The Animal Welfare Group is *'concerned that the Low TB Area cattle moved from or within the Low TB Area will no longer require a pre-movement test. We feel it is somewhat early to relax this requirement, as it provides an additional and important safety net to ensure infected cattle not detected by the SICCT test are not moved on. We consider that the requirement for pre-movement testing should remain in place and data assessed in due course to establish the levels of disease that are detected at pre-movement testing before deciding to lift the requirement for pre-movement testing'*.

- Animal Welfare Group suggests when movements from the High TB Areas into the Low TB Areas occur the Welsh Government should '*ensure imported animals are kept under scrutiny and some sort of quarantine until it has been established they are truly disease free. Possibly IFN- γ could be used either at pre or post movement testing to overcome the SICCT limitations*'.
- A number of vets made the point that PrMT contributes a significant proportion of vets' income annually. Removal of the requirement would endanger the future of vet practices in this area. Payment rate for Cymorth visits would need to be increased significantly to begin to cover the shortfall.

Six monthly testing for some high risk herds (identified by risk factors)

Very few respondents addressed this proposal specifically. Of those responses received, individuals agreed with testing high risk herds every 6 months. Questions were raised, however, about how risk would be defined in these herds and what would constitute a higher risk herd.

Offer and encourage a one-off Cymorth TB visit for all keepers in the Low TB Area. Cymorth TB visits will be offered in breakdown herds

Of those who addressed this specific point, the general consensus was supportive of extending Cymorth TB visits to all farmers in the Low TB Area. Some people thought that there is not enough emphasis on biosecurity in Low TB Area and increasing Cymorth TB availability in this area would reinforce the necessity of good biosecurity.

Dealing with Inconclusive Reactors (IRs)

(i) IRs found at standard interpretation in Officially TB Free Withdrawn (OTFW) breakdown herds will be re-tested using the IFN- γ test

Comments received from respondents who addressed this point were generally in support of IFN- γ testing Inconclusive Reactors at standard interpretation.

Comments included:

- All clear testing IRs should be removed in the low TB Area rather than be restricted to their holding of origin for life. As the test is not 100% accurate they could be a source of infection in the future.
- IRs in OTFW herds are likely to be of significance and testing these with the g-IFN test should reduce the risk of undisclosed infection remaining in the herd.
- Iechyd da (Gwledig) and others believe that all IRs should be treated as reactors in the Low TB Area.

(ii) positive IRs will be removed, clear tested IRs will be restricted to the herd for life.

The proposal to impose a lifelong restriction of clear testing IRs is common to all three categories of TB area. Most respondents made general comments on this proposal and were not affiliated with a particular TB Area. There was no consensus of opinion on this proposal. Comments on the concept of lifelong restriction of IRs can be found in section 5.4.

Review the use of Exempt Finishing Units with a view to not permitting them or making them indoor only.

Of those who responded to this proposal, there was no clear consensus on permitting EFUs in the Low TB Area. Some respondents believed that they posed a risk in the Low TB Area, others stated that they provide a vital outlet for finishing cattle in the area and should be retained.

General comments on EFUs can be found in section 6.6.

AFUs not permitted in the Low TB Area

Very few respondents addressed this point although of those who did, agreed that AFUs should not be permitted in the Low TB Area.

Monitor the level of infection in badgers.

Views on this proposal referred specifically to the results of the Badger Found Dead (BFD) Surveys. A number of respondents felt that badgers should be vaccinated in the Low TB Area to protect the badgers living there.

Comments included:

- Concerned that insufficient monitoring of wild mammals may lead to judgements based on inadequate data. For instance obtaining samples from badgers found dead may exaggerate the incidence of bovine TB in badgers due to the possibility that sick badgers may be more likely to be run over.
- RSPCA Cymru states it *'has always supported the need for more information on the prevalence of TB in badger populations especially in areas where the disease is not considered endemic in the cattle population'*.
- Some respondents felt that the Badger Found Dead survey was a start; as it confirmed for them that badgers carried TB, they often went on to say that this needed to be backed up by culling.
- There was a suggestion that badger surveillance (including cameras) should be available to farmers to assess activity on breakdown farms.
- A proper wildlife survey is required, *'BFD is inaccurate and doesn't take into account live badgers'*.
- Animal Welfare Group states *'although wildlife is implicated in the Intermediate Mid Area and both High Areas, apart from the dead badger survey, there is no empirical data provided to quantify the contribution to disease transmission from wildlife to cattle. Furthermore the dead badger survey demonstrated the relatively low level of disease presence with only 43 badgers out of the 648 carcasses examined being infected (6.6.%). In addition it is not clear whether these infected badgers were also considered infectious, or not'*.

- The found dead survey results should be presented in the same way i.e. as numbers rather than a proportion of the local badger population. And if possible the numbers should always be related to the likely badger population.
- Many, including CLA Cymru suggest that the survey should continue. Some suggested that if it cannot be done across the whole of Wales then it should be done in disease hotspots.
- RSPCA Cymru states that data on the prevalence of TB in the badger population is important to understand if there is an underlying source of infection in wildlife in areas where disease is not present in cattle and to help inform those who believe that badgers are the source of the disease when this may not be the case.
- BFD Survey information is misleading. The project was poor and APHA took too long to respond.

5.2 Intermediate TB Areas

Continuation of an annual TB testing regime and use of the IFN-γ test in the majority of breakdowns (mandatory IFN-γ testing for all new OTFW breakdowns).

Of those respondents who addressed this specific point, most agreed to use of IFN-γ testing in new breakdowns and in other breakdowns as appropriate.

All cattle moving within, between and from Intermediate TB Areas will require a Pre-Movement Test.

Few responses were received that addressed this specific point. Those respondents who commented supported the PrMT requirements for movements within and between Intermediate TB Areas and from a higher area. Conversely, some respondents disagreed with PrMT but no further explanation was received.

All cattle moving into an Intermediate TB Area from a High TB Area or similar but geographically separate Intermediate TB Area will require a Post-Movement Test.

Many respondents disagreed with the requirement to PoMT in the Intermediate TB Areas. They believed that a large proportion of cattle will already have had a PrMT and the PoMT would be pointless, stressful and costly to the industry. Some also felt that these sorts of controls would also be difficult to police.

Six monthly testing for some high risk herds (identified by risk factors).

Very many respondents, mainly farmers, disagreed with any consideration of 6 monthly testing in high risk herds in the Intermediate TB Areas. Some felt that more testing in these areas will be unmanageable and some questioned the benefit of the 6 monthly testing requirements for higher risk herds.

Of the small numbers who were in favour of 6 monthly testing for some high risk herds, a number suggested that a high risk herd should be defined as one that has had TB in the last 3 years.

IRs found at standard interpretation in Officially TB Free Withdrawn breakdown herds will be re-tested using the IFN-γ test (positive IRs will be removed, clear tested IRs will be restricted to the herd for life).

Many respondents, including Iechyd da (Gwledig), felt that IRs in the Intermediate TB Areas should be removed after the first test and not IFN-γ tested as these animals found in OTFW herds are likely to be of significance. It was acknowledged, however, that IFN-γ testing IRs should reduce the risk of undisclosed infection remaining in the herd. Comments on lifelong restriction of clear testing IRs can be found in section 5.4.

Indoor AFUs and EFUs permitted in the Intermediate TB Areas.

Few respondents commented on this specific point, but those who had a view felt that AFUs should only be authorised to take cattle from within the same TB Area as they are based.

Cymorth TB visits offered to breakdown herds.

Those who addressed this point felt that Cymorth TB should be rolled out to all herds in the Intermediate Areas, regardless of whether they have had a breakdown or not.

Encourage badger vaccination when vaccine becomes available.

Many respondents disagreed with the proposal to encourage badger vaccination in the Intermediate TB Areas. Those who responded questioned the benefit of vaccinating badgers as it will have no effect on infected badgers which will harbour and preserve infection within the wildlife population. Some felt that badger vaccination should not be pursued because it has no proven record of success in the longer term. Others commented that vaccinating badgers is very expensive, takes a long time to have any impact (if any) on TB in cattle and it is not known when or whether the supply of vaccine will be restored. Those who disagreed with badger vaccination favoured a badger culling policy in breakdown herds where badgers are known to be the likely origin of disease.

Some respondents who agreed with the proposal to encourage badger vaccination felt that it should be deployed to protect badgers and cattle in the Intermediate Areas. Others felt that it should be rolled out across all areas.

Comments included:

- If and when supplies of badger vaccine are restored, the Welsh Government should ensure that multiple suppliers are available in order to provide uninterrupted supply, should one company fail to meet the demand. The Born Free Foundation states that in light of the Badger Found Dead Survey (particularly with regard to the IAA) that: *“We would therefore strongly advocate that if any badger intervention is to be considered with the aim of reducing bovine TB prevalence among badgers in areas of high bovine TB incidence/prevalence in cattle, vaccination should be the only option on the table”*.
- Marches Badger Group believes that badger vaccination in the IAA should continue in order to protect them against cattle TB and prevent the disease becoming established in the badger population.
- The need to vaccinate badgers is a diversion and will only benefit badgers in stopping them getting the disease from cattle as it is unlikely that badgers transmit the disease to cattle. This will have no effect in reducing the disease in cattle.

- Vaccination of wildlife is a much better solution than culling.
- Vaccination should not be considered further until a full independent assessment of its success in the IAA has been evaluated by veterinary specialists. The scarce financial resources should be put into better use (e.g. targeting livestock management and monitoring within livestock markets and those who regularly act as cattle dealers).
- Use of an expensive vaccine on a potentially infected badger is a waste of money

5.3 High TB Areas

Six monthly Whole Herd Testing.

Very many respondents disagreed with six monthly whole herd testing in the High TB Area, mainly due to practical concerns as well as health and safety risks to the farmer and the impact on welfare of the cattle. Many respondents raised concerns about the huge additional burden that 6 monthly testing would bring and questioned whether it would be worth it when annual testing has shown to be effective in reducing the number of TB incidents in Wales, whereas 6 monthly testing in the IAA remains unproven.

Many farmers in particular were opposed to 6 monthly testing on the grounds that farmers outside Wales would see herds on 6 monthly testing as higher risk and this would put them off buying from these areas. There were additionally many respondents with concerns about the cost of additional testing with a large number stating that farmers should not be expected to meet the costs of testing.

Many respondents commented that 6 monthly testing would be extremely detrimental to beef suckler herds due to practicalities of arranging the tests during times when cattle are out at pasture. Additionally, it would interfere with breeding and calving seasons where any undue stress can cause severe losses in pregnancies.

Some respondents were concerned about whether there would be sufficient veterinary capacity to undertake 6 monthly testing in both the High TB Area as it would result in a considerable number of additional tests.

Some respondents agreed that 6 monthly testing would help find disease quicker, but proposed that it should only be implemented in higher risk herds as opposed to implementing a blanket approach to the High TB Areas.

Comments included:

- 6 monthly testing will destroy cattle industry in Mid Wales and will have a major impact on suckler herds and affect welfare of animals. It will be costly to farmers. It is not the best use of financial or veterinary resources.
- Should only 6 monthly test high risk herds (based on TB history) as proposed in the other areas.
- 6 monthly testing should be trialled in dairy herds first as the cattle are easier to gather.
- 6 monthly testing would affect the welfare of animals under restriction and it is unfair to expect farmers to take time out of their summer work schedule to undertake further testing.

- RWAS does not agree with the proposed six-monthly testing of cattle, which could cause many practical and welfare difficulties.
- Disagree with 6 monthly testing – contiguous testing already takes place.
- Increased frequency of testing will increase detection of disease earlier in the disease process.
- If 6 monthly testing could be done while cattle are housed (e.g. mid/late November and again April/early May) it would significantly reduce handling and movements as well as stress and workload.
- There is no evidence from the IAA that 6 monthly testing works. As the success of 6 monthly testing remains unproven, it is not appropriate to implement such a regime given all the practical difficulties of additional testing, staffing, health and safety risks involved all of which have major impacts on businesses and farming families.
- Disagree with 6 monthly testing – it will pick up breakdowns quicker potentially but feel that this is already largely achieved by contiguous testing – which is more targeted – especially if local spread is the concern. Small beef farms which have never had a breakdown and are not contiguous to a breakdown farm will end up being tested twice annually and they are of limited risk.
- The Tenant Farmers Association (TFA) Cymru expresses concern about the practical implications of moving to 6 monthly testing. Annual testing is a considerable burden upon the farming industry and vet profession and there is doubt about the extent of gain in terms of disease control by increasing testing twice a year.
- Additional testing would be too much of a drain on veterinary resources. These practices would not be able to meet demand with the staff they have and it would not be financially viable to employ more staff. This may be particularly relevant after the UK leaves the EU, depending on the status of non-UK qualified vets
- Disagree with 6 monthly testing on cost grounds, but it might encourage farmers to eradicate TB as soon as possible from their holding.
- Testing herds every 6 months will be a huge additional burden to farmers, especially as the majority will be no where near a TB breakdown. It will increase the costs of testing significantly. The current system has led to a reduction in breakdowns so it is difficult to see how 6 monthly testing will help.
- 6 monthly testing will affect other paratuberculosis testing. The potential for false positive results as a result of Johne's is significant.
- If 6 monthly testing is introduced, clear testing herds for 3 consecutive years should be allowed to move to annual testing.

All cattle moving within, between and from High TB Areas will require a Pre-Movement Test (no Post-Movement Testing).

Those respondents who addressed this specific point agreed that Pre-Movement Testing was appropriate for movements within the High TB Areas and from the High to the Intermediate and Low TB Areas. A number of respondents felt that PoMT should also be

mandatory in the High TB Area in order to pick up undetected infection, particularly if the moved cattle are from the Low TB Area where PrMT has not been required.

More restrictive herd movement controls will be used.

Few respondents commented on this proposal but those who did generally agreed that breakdown herds in the High TB Areas should have restrictive herd movement controls imposed. However, if this meant they were not able to sell to Intermediate and Low TB Areas when restrictions were lifted then this would cause unfair impact on trade for these herds.

Another commented that implementing more restrictive internal and external movement controls would impact on the traditional management of common land, with stock potentially being restricted from moving between the main holding and the common as well as resulting in animal welfare problems. It would also impact negatively on the environment and wildlife management.

The IFN- γ test will continue to be used on an ad-hoc basis for new and chronic breakdowns.

Very few respondents commented on this proposal. Those who did had mixed views stating that IFN- γ testing should help identify disease not detected by the skin test so should be used routinely in the High TB Areas. Others disagreed with whole herd application of IFN- γ testing as it is not a definitive way to get farms off restrictions.

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.

Again, very few respondents addressed this specific point in the consultation. Views were mixed but concern was raised about the cost of additional IFN- γ testing of high risk animals/management groups where it might be better and more financially sound in the long run to slaughter these as reactors.

Removal of standard IRs as reactors in all OTFW breakdowns with clear testing severe IRs restricted to the herd for life.

There were mixed views on this proposal with no overall consensus of opinion. Some felt that slaughtering standard IRs would reduce the specificity of the skin test. A number of respondents commented that farmers should be able to re-test standard IRs with the skin and/or IFN- γ tests, particularly if they have been free of disease for a number of years.

Some stated that as 50% of IRs subsequently test clear, the proposal would mean that more herds are put under restriction and subject to Short Interval Testing unnecessarily. As long as these animals are appropriately isolated pending further testing, then they are not a risk to the rest of the herd.

Some felt that slaughter of standard IRs should only be undertaken in chronic breakdowns, rather than in all OTFW breakdowns as a blanket approach.

Others felt that removing standard interpretation IRs would be of benefit in order to get ahead of infection in the early stages.

Comments on lifelong restriction of clear testing severe IRs can be found in section 5.4.

The clearing test that lifts TB movement restrictions from a herd will not be able to be used as a Pre-Movement Test.

Very many respondents disagreed with this proposal for a number of reasons. Some felt that the measure was excessive for farms with little history of TB and it would be better used on a targeted basis. A general theme arising from respondents was the additional hardship this proposal would cause farmers and the additional time they would need to wait after restrictions were lifted in order to sell their stock. This will cause suckler herds selling store cattle particular hardship due to the nature of their businesses and their need to sell store cattle in the Autumn.

Many felt that this measure makes businesses unworkable as it has potential to increase time prior to selling animals by 50% which will have serious implications for cash flow, cost of production, maintaining sustainable stock levels and animal welfare standards. The only way producers could absolutely ensure adequate welfare standards would be to run farms at 2/3 stock capacity which would render the majority of businesses unviable.

Some felt that it undermines Government's faith in the current TB skin test. Herds suffering a breakdown would have already been subject to at least 2 clear tests and this should be enough to warrant fully lifting movement restrictions and allowing them to trade as they see fit. There is feeling that this would be of little benefit but the ramifications on businesses would be enormous.

Comments included:

- Some disagree that the clearing test should not be used as a Pre-Movement Test in High TB Areas. No evidence to suggest this will be of benefit. This arrangement will make it impossible for many suckler businesses to trade as they rely on selling store cattle in the Autumn.
- By extending the time that cattle need to remain on farm by 60 days after restrictions are lifted, for beef farmers it will mean that the seasons for selling store cattle will have passed and demand will not be there when the farmer is finally free to sell. This will have a damaging effect not only on farm businesses, but will also decimate cattle markets and abattoirs which cannot function without a throughput of cattle.
- Not allowing the clearing test to be used as a PrMT will cause problems where there is an end to a tenancy occupation, where there is a bereavement in the family and action has to be taken at an early date and where a farming business has been restricted for a long period, has a clear herd test and then wishes to sell cattle early due to cash flow problems. This additional test is unnecessary.
- Not allowing the clearing test to be used as a Pre-Movement Test gives a longer period for cattle to be deemed TB Free so reducing likelihood of onward transmission; however, it undermines the validity of the skin test.
- Disagree with this proposal as it is not conducive to animal welfare and the financial sustainability of a holding. If 2 clear tests have been achieved, the second test should be considered as a PrMT. To do anything else is not conveying the right message about confidence in the 2 clear test regime.

- If a clearing test is successfully completed following return of the cleansing and disinfection declaration restrictions will be lifted. What can be done to prevent the lawful sale of clear tested cattle? If the proposal is that TB2 restrictions should not be lifted until 60 days after the clearing test, then this should be stated in the consultation.
- Not allowing the clearing test to be used as a PrMT may reduce the risks inherent to herd dispersal sales, doubtful it is likely to reduce the risk associated with selling small groups of cattle due to the known inherent problems of reduced sensitivity of the skin test when not applied as a herd screening test.

Biosecurity Improvement Notices will be issued for all OTFW breakdowns in the areas, requiring keepers to improve their biosecurity in line with the requirements.

Of the respondents who addressed this proposal, comments were generally supportive of the application of Biosecurity Improvement Notices to all OTFW breakdowns in the High TB Areas. Many stated that they should not be overly bureaucratic and they should be backed up with real understanding and farmer buy in to their role. Others suggested that there could be a means of combining them progressively with Cymorth TB. It was also suggested that Biosecurity Improvement Notices should be apply to all farms in Wales, however others believed their use should be confined to the High TB Areas.

Others felt that although Biosecurity Improvement Notices may be relevant in some cases, there are herds that suffer breakdowns despite taking all reasonable precautions. To issue notices to all OTFW breakdowns may put unreasonable demands on such farmers.

It was suggested that grants could be made available to help fund improvements and non-compliance should be monitored with appropriate financial consequences.

Indoor AFUs and EFUs permitted in the High TB Area.

No specific comments were received on AFUs and EFUs in the High TB Area, however, some made more general comments on Finishing Units. This is covered in section 6.6.

Work towards expansion of Cymorth TB to offer free bespoke veterinary advice to all herds in the area.

Few respondents addressed this specific proposal. However, those who did were supportive of the wider roll out of Cymorth TB in the High TB Area. There was feeling that this should be expected anyway as part of Herd Health Planning between farmers and their vets.

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.

Very many respondents welcomed this proposal, but some felt there was not enough detail outlined in order to give a considered opinion and requested more information following the Cabinet Secretary's statement of 18 October 2016. Many farmers who responded believe that the '*simple answer is to cull the badger*', many vets agreed with this. Many believe that Wales simply cannot have an eradication programme unless all sources of the disease are dealt with.

A large number of respondents believed that there must be a quid pro quo for farmers who will be subject to extensive requirements, in order to ensure farmer compliance. That quid pro quo is allowing the removal of the wildlife reservoir of infection.

Many of those who supported a cull of badgers put forward suggestions on how it might be undertaken. For example it was suggested that badgers and deer should be culled within a 3-5km radius of a TB breakdown. A large number stated that badger culling should be undertaken by the army.

Some agreed with a Trap, Test and Vaccinate or Remove (TVR) approach because it would be more acceptable than the indiscriminate culling of badgers, but many were concerned about the inaccuracy of the test, the practicalities of delivery and the welfare considerations of the badgers.

Generally responses from outside of the farming industry/ veterinary profession, however, felt that no cull of badgers should ever take place under any circumstances. Those who opposed badger culling stated that reductions in TB cases in cattle are falling in Wales without badger culling taking place.

Many respondents provided general comments on dealing with TB infection in wildlife across Wales.

Comments included:

- Many support all of the proposed measures. However, given the extent to which existing surveillance, cattle controls and biosecurity are failing to bring the disease under control they believe that badger culling must be deployed in the High TB Areas.
- RSPCA Cymru believes that the statements regarding the role of wildlife in the disease spread are not specific enough. Evidence of the disease is noted in a proportion of badgers within the High TB Areas however this proportion is not stated. It is important not to give the impression that badgers and other wildlife have a significant role to play in the current disease status, since the evidence for this is poor. Wales has made good progress in reducing the number of breakdowns by implementing cattle measures alone.
- Cull badgers where TB infection can be proved in a badger sett in High TB Areas.
- Many who supported a cull of badgers quoted figures from the Badger Found Dead Survey, one respondent stated that *'6.85% of the badgers were positive for M. bovis. This is probably 1,000 times the individual animal prevalence rate in cattle. This has major implications on the epidemiology of the disease'*.
- As badger vaccination remains unproven in terms of its long term benefits and vaccine is currently unavailable, culling of badgers in areas where they are one of the main disease drivers is required.
- Dyfi Badger Group is strongly opposed to any culling of badgers (TVR, reactive or localised). Dyfi Badger Group is also unhappy with the term 'appropriate interventions' as mentioned in the consultation as it is non specific. They fear that it is linked to culling of badgers as a possible option, if so they feel that the consultation should have addressed this more openly.
- Allowing small scale culling could influence farmers to take the law into their own hands and illegally kill badgers.

- Iechyd da (Gwledig) welcomed the proposal to take appropriate action to break transmission routes between cattle and wildlife, and that this is carried out quickly to help encourage farmer compliance
- NFU Cymru welcomes the statement that we *take appropriate interventions to break the transmission routes of disease between cattle and wildlife*, they furthermore believe that evidence linking the badger to disease spread is unequivocal.
- Many respondents believe that badgers are the major source of infection in cattle and, as such, some form of culling is necessary. Reactive culling around breakdown where infected badgers had been identified, perhaps also involving vaccination, was an approach preferred by many. This included further testing, including the use of a PCR test, around breakdowns to identify infected setts.
- Some others felt that proactive badger culling in the high TB area was more appropriate and both suggestions included licencing farmers to carry out culls.
- Many of those who disagreed with badger culling felt that there is little evidence that any form of badger cull would reduce TB in cattle as well as evidence that reactive culling would make the situation worse and there are practical difficulties and limitations to trapping and testing badgers. Instead resources should focus on the primary source of infection i.e. cattle.
- Badger culling in some instances can be achieved without additional legislation and can be very effective.
- Supportive of the fact that some badger culling is being considered. Believe that judicious culling operations are essential to achieve the aim of eradication in the absence of proven long term benefits of vaccination and while vaccine is still unavailable. Where veterinary epidemiological assessments of breakdowns identify badgers as a likely source of disease then culling options should be explored.
- Wales needs a badger cull immediately. It is virtually impossible to protect cattle from the infected wildlife when they go out to grass.
- Farms where there is a high incidence of TB in cattle should be ring fenced and wildlife tested and those that are infected should be culled
- Culling more logical and humane than vaccination.
- A number of respondents suggested that the New Zealand model for dealing with possums should be replicated in badgers for dealing with badgers.
- Badger culling should be done in 10 areas as in England.
- The protection of badgers must be removed and allow the custodians of the countryside to manage the countryside.
- One respondent states *'The trap, test and cull or release strategies have already been considered in Wales. The 2009 report [Badger Control Model for Wales - Trap-Test-Cull-Vaccinate, Supplemental Report 4th March 2009; D.Wilkinson & G.C.Smith] into the*

possible strategy concluded that it would probably exacerbate the disease, and I see no reason why the assessment would be any different now'.

- The respondent goes on to say *'A test on an individual badger, or a sett (should suitable tests on faeces etc. become more reliable than currently achievable), gives a positive result, then the whole social group should be culled. The significance of a single infectious animal in a sett must not be overlooked; that animal may have shed M. bovis into the humid dark environment of the sett and the rest of the badgers in that sett will be at risk. Even if the individual animal is located and removed, then infection spreading within the same social group is highly likely. Therefore, I believe that the sett should be targeted, preferably using the application of modern humane methods of culling, such as the use of inert gasses, such as Nitrogen, probably best delivered as foams. To reduce perturbation effects, following this, the vacant sett should be physically destroyed in order to prevent its recolonisation by other (possibly uninfected) badgers; as M. bovis would persist for many months in the environment deep in a sett and present a threat for any recolonising animals'.*
- Another respondent states that the *'Badger cull issue does not go far enough and you are not addressing other issues like infection in local badger populations. Finding one infected badger and then taking a few in one sett does not help control TB on a bigger scale'.*
- Protected status of the badger should be removed to allow natural culling in areas where problems are being experienced – thus reducing culling costs.
- Welcome research into proving whether and how badgers are responsible for passing disease back to cattle.
- Encouraging deer fencing around woodland occupied by badgers may help reduce cross-infection as well as being beneficial to the health of the woodland.
- Farmers would be more receptive to the changes if serious steps are taken to control TB in wildlife – e.g. PCR testing of latrines with targeted culling and/ or removing the protected status of badgers.
- If left unchecked the badger population will explode bring serious problems for country dwellers and risks to the food growing soil and management of farms. Apart from badgers digging up the ground and hedges and making a mess they also create a dangerous environment for all other wildlife for example the hedgehog.
- RSPCA is cautious about accepting proposals such as the TVR approach. They would want to see how this policy has worked in Northern Ireland before they would support the development of this policy in other parts of the UK. RSPCA is sceptical of any test used in the field to accurately determine the disease status of the badger.
- RSPCA supports the principle that it should be demonstrated scientifically that badgers are indeed contributing to the problem before any lethal measures are proposed. RSPCA Cymru would not want to see decisions taken on the assumption that as no evidence for the disease can be found in a herd that it must be down to the badger. An extensive study on husbandry practice on farms that suffer breakdowns is required.
- The aim must be for healthy wildlife population alongside a healthy cattle population. The terms wildlife management should be used as a term rather than culling.

- Marches Badger Group believes that badgers are being used as scapegoats due to the misconception that non visible lesioned reactors were not infected. It could be that they have re-infected the herd and it is possible that in chronic breakdowns these farms are TB reservoirs themselves and badgers are spill overs. In these cases whole herd eradication should be considered.
- Marches Badger Group believes that badgers are not infecting cattle who suffer a respiratory disease. They believe that any animal suffering from bovine TB should be euthanised. However as the sensitivity of the test is quite low Marches Badger Group believes that if TVR is adopted, badger post mortem should follow to verify diagnosis. It is probably that badgers are infected from cattle and Marches Badger Group would not support anything leading to a mass badger cull.
- The TB test for badgers, Chembio Dual Path Platform VetB (DPP) test has low specificity and sensitivity and currently the laboratory performance of the test cannot be replicated in the field. Once a quick and reliable test for badgers is available for use in the field then it may be realistic to adopt a test and release or remove by killing humanely protocol.
- Any partial removal of the badger population will have a disruptive influence on the spread of TB in both badgers and cattle with the potential to exacerbate the problem. The only way such a strategy could be employed in a management programme is after a suitably controlled experimental trial. Limited resources would be better used on cattle measures which can only have a beneficial impact.
- Illegal killing of badgers will exacerbate the problem and illegal activity needs to be firmly addressed and farmers should be educated that these actions undermine TB measures.
- Environmental issues will need to be considered with appropriate assessment if taking place in an EU special area of conservation or preservation.

5.4 General concept of lifelong restriction of clear testing IRs (at standard interpretation in Low and Intermediate Areas and at severe interpretation in the High TB Areas).

There were many general and mixed views on the concept of lifelong restriction of IRs with the majority of respondents disagreeing with the proposals. Many felt that the proposal undermines the confidence in the skin test as if an animal tests clear then, despite being previously declared IR, it should be deemed free of disease and therefore able to be traded if the farmer so wishes.

Many respondents did not understand the benefit of restricting IRs to the herd as if they are perceived as a risk to other cattle then they should be slaughtered, not left on a holding to potentially infect the herd and other cattle brought onto the herd.

Others felt that limiting the movement of the IR to within the herd would also limit the potential for onward spread of disease and would address the limitations of the skin test. Some suggested that lifelong restriction should only be imposed if the farmer in question is agreeable, if not the animal should be slaughtered.

Others disagreed with the ability to designate an animal inconclusive. It should either be deemed a reactor and slaughtered or declared free of disease.

- If the IRs are younger animals on beef suckler units, it could limit the profitability in these herds.
- Gwent Branch of FUW disagrees with restricting IRs to their herd for life as it is 'unfair as suckler cows often stay in the same herd for life and many animals have tested IR once early in their lives and have tested clear every year since, indicating those cattle are free of disease'.
- Focus needs to be made on communication and clear guidance on how IRs are treated in each area. Currently it varies from one farm to another based on historical risk. Need clear communication and consistent approach and protocol for the consequences of having IRs during a surveillance test.
- The actions for dealing with IRs and their risks in the future could be taken further.
- IRs should be allowed to be sold to AFUs.
- Disagree with clear testing IRs being restricted to the herd for life because it will encourage vets to class them as reactors first time around and will skew the figures and make farmers have less confidence in the TB test.
- Some support the restriction of clear testing IRs to the herd but would propose that farmers are able to slaughter these animals which would be subject to compensation.

6. Other consultation proposals

6.1 Development of a standardised online biosecurity package.

Many respondents supported the development of a standardised online biosecurity package to provide guidance to keepers on practical measures they can adopt to help protect their cattle from disease. A large number believed that the package should not be limited to online availability only due to poor internet speeds in some parts of Wales and the feeling was that it should be available in paper copy as well and should never replace face to face advice.

Many industry representatives asked to be included in the development of the package, other suggested that the regional boards should be responsible for taking this forward.

Some respondents were concerned that the measures suggested in such a package would be practical, deliverable and affordable to farmers. Many felt that the package needs total buy in from stakeholders in order for it to work.

A number believed that the package should be flexible enough to take account of individual circumstances and the different risks and disease drivers in each TB Area. It was felt by some that a list of practical measures to help safeguard their business should be made available to all farmers. Each farm should be considered individually so specific factors at play on specific farms can be taken into account.

Some believed that biosecurity standards should already be covered as part of farm assurance schemes, dairy hygiene rules and cross compliance requirements. It was also felt that the Welsh Government should not need to promote and develop biosecurity measures, a minimum biosecurity standard should be mandatory on each farm.

Many respondents, in particular vets, believed that implementing measures to enhance biosecurity on farm is ineffective when not backed up by action against wildlife. A number of respondents suggested that other diseases should be covered within the package and the results should be linked to the various accreditation schemes available.

Other comments included:

- The Animal Welfare Group states *'we believe what needs to be communicated is that the farm environment can also be harbouring infection and the default position should be the likelihood of ever present infection on the farm and in movements on and off the farm to trade, markets and shows. The removal of reactor cattle and two short interval tests does not mean the farm is now disease free'*.
- St James' Vet Group states *'having been part of the biosecurity tool that was used in the Gower area 2011-2014, we saw good feedback and improvement on many after educating farmers. A particular benefit was being able to educate farmers on badger ecology and ensuring they were well informed about the disease in badgers and their interaction with cattle. This helped sell biosecurity measures'*.
- Saved and Safe believes there should be biosecurity plans for every farm- based on a standard approach and modified farm by farm
- Consideration should be given to the long term benefits to support capital investment on farms which could lead to biosecurity improvements in the areas of high disease incidence. This may offset additional management costs and reductions in compensation that are proposed.
- RSPCA Cymru would like to see biosecurity measures become more integral in the control of bovine TB in all areas. Particularly important in the Intermediate and High TB areas where a large number of breakdowns are found by contiguous testing and through persistent infection. A study into the number of farms with biosecurity measures in place and the effect of implementation on herd breakdown numbers would be useful.
- On farm biosecurity measures can be implemented but concerned about interaction with badgers when cattle are turned out in the Spring.
- Farmers need help understanding biosecurity and understand that the disease is not all about badgers.
- Iechyd da (Gwledig) believes that any online tool needs to be farmer friendly and should be compatible with Cymorth TB visits and other tools such as farm data packs.
- Sources of advice from different areas can lead to confusion so one accurate source is required.
- Money should be allocated to farmers so they can undertake biosecurity improvements on their farms.

6.2 Introduction of a compensation cap of £5,000 and continue to review the compensation system

There were mixed views received on introducing a compensation cap of £5,000 per animal. Some agreed with the proposed cap in order to make the compensation element of the

Programme more financially sustainable and fairer to all involved. It was also felt by some that lowering the compensation cap would stop farmers abusing the system and those few who are profiting from TB. Many farmers agreed with the cap and made the point that a table valuations system would be the undesirable alternative.

Very many respondents made the point that it is likely to impact on high genetic value animals, stating that a cap does not encourage investment in high quality bulls and the stock will decrease in value. Some felt that the cap as it currently stands (£15,000) is acceptable and some felt a cap of £10,000 is appropriate and some felt it should be further reduced to £3,000. Others suggested that a cap of £2,500 for commercial cattle and £10,000 for pedigree stock would be the best option as it would not deter breeders from investing in top quality stock, nor would it reduce the standards of Welsh cattle. Many felt that there must be provision within the current valuations systems to provide appropriate compensation levels for animals of exceptional merit and pedigree.

Some respondents felt that it would be better to further link compensation levels with behavioural changes and compliance with testing, isolation, biosecurity and informed purchasing.

Others favoured making improvements to the current valuation system rather than imposing a cap. Improvements might include a panel of valuers undertaking and/or checking the valuations. Another suggestion proposed holding 2 collection centres for TB reactors (one in south and one in mid Wales) on a weekly basis. 3 Valuers could attend along with a monitor valuer. Cattle would be valued and then go to slaughter and would alleviate 5-8 valuers travelling across Wales on a weekly basis. Farmers would be expected to deliver cattle to the centre and hauliers would take them to the abattoir. Additionally it was suggested that to ensure the current valuation system is robust, an annual valuers day should be held for contracted valuers where all aspects of the valuation contract are covered.

A general theme from respondents to this point was that obtaining insurance is unrealistic and there is concern, if insurance was available, farmers could not afford the premiums, particularly in High TB Areas or if they have had history of disease. Taking up insurance may be more practical if the Welsh Government worked with a Government accredited insurer to support and provide the necessary cover for farmers at an affordable rate.

Other comments included:

- Current compensation regime goes nowhere near what is required to cover the cost for loss of an animal.
- Some felt that a fair compensation system is required that takes into account the stress and pressure placed on farmers as well as recognising pedigree stock.
- Government should not pay farmers compensation for infected cattle as other industries have to bear the costs of 'faulty products'.
- RWAS has '*some concerns over placing a cap on the compensation payable per animal. Wales has some of the most superior cattle genetics in the UK which is often the culmination of generations of careful breeding and stockmanship skills. Some will be disadvantaged by this proposal and this measure needs careful consideration before its introduction*'.
- Farmers would only accept a compensation cap if farmers are allowed to control wildlife.

- If the farmer can provide an invoice or proof of value then that should be honoured.

6.3 Compensation reduction for keepers who wish to move cattle between units within the same herd in chronic herd breakdowns.

There were mixed views on this proposal. Some felt that it is unfair to penalise farmers for moving cattle within parcels of land within their CPH outlining the practical difficulties that this would create for their businesses and raised welfare concerns for cattle that would ensue.

Many felt that intra-herd movements within breakdown herds, particularly large herds, should be kept to a minimum to limiting disease spread. In particular BVA/BCVA supports this proposal for chronic herds. Some had concerns that amalgamating CPHs would weaken disease control as it would result in less recording of cattle movements and some agreed that the Government should not have to carry the cost where there is an increased risk due to within herd movements.

Comments included:

- Agree with this proposal. The new CPH rules will help with this and clarify when PrMT is required and will prevent cattle travelling long distances between sites which are officially under the same CPH.
- Agree – farmers should be made responsible for any risks they take.
- Restricting movements of cattle within a restricted herd could cause management and welfare issues. If adopted it needs to be applied carefully with due consideration of such factors.
- This proposal would affect the ability for dairy farms to diversify into rearing units for local dairies.
- Agree with this proposal as it reduced intra herd moves and helps control disease and cost.
- Question a policy that forces an individual from the freedom to direct business in a way they would like.
- Farmers set up units to do distinct jobs (e.g. dry units etc.) which are often situated away from the main unit and farmers should not be penalised for moving cattle between these units.

6.5 Further link compliance with CAP scheme (or future subsidy schemes) subsidy payments.

Very many respondents agreed in giving a financial penalty to those who do not follow the rules. Some agreed that cross compliance penalties were a good way of achieving this, however, a large number of respondents disagreed with using this mechanism as not all farmers claim subsidy, therefore, those who break the rules but do not claim do not get penalised. Those who disagreed with the proposal believed a fixed penalty should be given to those who break the rules so that there is a consistent approach to dealing with non compliance.

Those who agreed with cross compliance penalties felt that the penalties should be proportionate and appropriate and there should be leeway given to extenuating circumstances that may prevent a farmer following the rules.

Comments included:

- Accept penalties where there is a blatant disregard for the rules but requirements must be practical.
- Failure to follow the rules should be dealt with as a fine (a set fee) rather than a percentage cut in subsidy. Bigger producers are being fined more than smaller producers for the same crime.
- Some who oppose the use of cross compliance penalties in respect of failures associated with TB testing protocols believe that the current penalties in place within the animal health and welfare legislation are sufficient.
- At the very least before cross compliance penalties are implemented there should be a consultation on what might be considered extenuating circumstances or force majeure which would allow penalties not be imposed.
- There should be an increasing level of financial penalty for late tests and similar penalties for other breaches of the regulations.
- Agree to cross compliance penalties for those who do not follow the rules. However, they need to be practical, proportionate and understandable.
- Iechyd da (Gwledig) agrees with the proposals but are concerned that this will not work as a lever with farmers who do not claim farm payments.

6.6 Finishing Units - Proposals to either subject Exempt Finishing Units (EFUs) to more stringent controls or to ban EFUs in the Low TB Area; AFUs to remain unpermitted in the Low TB Area.

There was no clear agreement on EFUs with some agreeing to their removal in the Low TB Area and others suggesting they should be maintained but with stricter controls as they provide a vital outlet for unfinished cattle.

Others suggested that a third category of Finishing Unit should be created for all stock destined for slaughter. This could ease pressure on keepers under restriction during the Autumn when replacement stock needs to be purchased.

Comments included:

- RSPCA Cymru believes that if EFUs are permitted in the Low TB Area the cattle should be from farms with the lowest TB risk, i.e. farms which have not suffered a breakdown with a certain number of years (e.g. 3+). A decision should be based on the number of breakdowns occurring in EFUs located in the Low TB Area and thus the risk they represent.
- EFUs should not be permitted in Low TB Area, animals should be slaughtered to minimise the risk of infection being brought into an area.

- Many see the benefit of having EFUs and rather than see them banned in the Low TB Area completely, some accept the need for these to adhere to 6 monthly testing and other more stringent controls.
- CLA would like to see the number of businesses affected if EFUs were revoked in the Low TB Area.
- RWAS disagrees with the withdrawal of EFUs. They offer an important outlet to farmers affected by a disease breakdown and are often necessary for business cash flow and animal welfare grounds
- Everything should be done to allow EFUs and AFUs to exist as they provide a necessary lifeline for overstocked farmers to have at least one avenue to pass on young stock – albeit at discounted prices.
- Movements should be allowed via livestock markets to allow for more competition for farmer's animals.
- Agree with removing EFUs from Low TB Area. Suggest imposing restrictions in Intermediate TB Area so they can only accept cattle from Low and Intermediate areas and not from high areas.
- Testing EFUs could be based on their biosecurity. High standards could be allowed 12 monthly testing whereas low standards could be required to test every 6 months.
- The Animal Welfare Group is concerned at the retention of EFUs in the Low TB Area and feels it would be timely for these to be phased out.
- EFUs and AFUs should only be allowed in the High TB Areas and more carefully monitored.
- Should be PrMT requirements for movements to EFUs.
- EFUs should be indoor only with good biosecurity. There should be no greater risk from keeping EFUs.
- Testing requirements for EFUs should be removed like in England.
- AFUs should only be able to source cattle from the area they are located. Whereas others suggested that there should be more incentives to sell to AFUs to reduce the number of animals on a breakdown farm.

6.7 Retain, but review passive surveillance of TB in non-bovines.

Very many respondents believed that non-bovines should be subject to the same controls as cattle with annual testing and slaughter of reactors. To facilitate this, many agreed that a register of non-bovines should be mandatory.

Others believed that passive surveillance was working but it could be enhanced by making keepers of non-bovines more aware of the signs and symptoms of disease and what they need to look out for.

Some suggested testing non-bovines should be targeted and be undertaken in the locality of cattle herd breakdowns

Comments included:

- BVA/BCVA suggests the 2011 Order should be extended to farmed non-bovines with zoo animals being exempted.
- Track pet llamas, goats and deer etc. through a database make holding numbers and movement licences compulsory for alpacas and llamas so they can be mandatorily tested like cattle and breakdowns dealt with by slaughtering reactors.
- Does not believe camelids are negligible risk, they should be tested in the same way as cattle are.
- All keepers of non-bovines should be registered and testing carried out accordingly.
- Non-bovines pose a risk to their owners etc. e.g. risks to children at petting zoo.
- Non-bovine herds close to problem cattle herds need regular testing.
- There are gaps in the surveillance and control associated with non-bovines and would encourage WG to come forward with proposals which tackle the risks.
- Consider helping farmers deer proof their holdings in areas where wild deer are known to stop them infecting cattle.
- Need a more structured surveillance of camelids and other high risk species, especially with their increasing popularity.

6.8 Work towards introduction of an Informed Purchasing (IP) system similar to the Risk Based Trading System they have in place in New Zealand and that was in place in Australia.

Many supported the proposal to introduce a system so that farmers would know the status of cattle they are buying. Some commented on their frustration that this information is not currently available and that it can only be a good thing. Because of this many agreed that there should be mandatory system in place with the testing history of the herd and animals provided at sale. Additionally some respondents believed that the number of movements to different premises should be included in the information available to purchasers.

Some respondents suggested that movements from higher risk to lower risk areas should be prohibited. There were many respondents in support of such a system being adopted on a Great Britain basis to ensure the same information is available and displayed at markets nationwide.

Many mentioned the need for a database to be established so that the information could be verified and available to all. Some supported the New Zealand style system as it focuses on the individual farm whilst others felt that farmers should be encouraged to enter herd health schemes. A large number of respondents made the point that for the system to be a success, it needs to be properly policed so that keepers cannot claim that their herd has been free of disease when it has not.

Others, particularly those farming in the High TB Areas, were concerned about the potential the impact on trade and some had concerns about confidentiality.

Many thought that a CHeCS TB scheme would be very beneficial and a useful way to show that herds are a lower risk. Some also suggested that herds in a CHeCS scheme should have exemptions to some of the controls.

Comments included:

- Agree that more information, including the disease status, needs to be available to purchasers.
- Risk Based Trading (Informed Purchasing) will have a devastating impact on all farms in the High TB Area, particularly beef suckler herds, whether they have had a TB breakdown or not and irrespective of steps they may have taken to protect their herds from infection.
- Voluntary or mandatory systems will be unfair to farmers in High TB Areas as other buyers may not wish to purchase their stock from them or they may get a reduced price for their stock than cattle in low/intermediate areas.
- Gwent Branch of FUW states that *'informed purchasing as described will lead to needless suspicion by potential purchasers and will seriously affect business in high TB areas and could lead to closure of livestock markets'*.
- Animal Welfare Group suggests applying a numerical value corresponding to the number of years ad OTF herd has been free of TB.
- Animal Welfare Group states *'it may be timely to introduce some mandatory risk based trading controls, particularly if the aim is for the Low TB Area to apply for Officially TB Free Status'*.
- NZ and Australia have measures to deal with wildlife. Farmers would be more inclined to sign up to this system if the same measures were applied to Wales.
- RWAS *'supports IP by virtue of a risk assessed score to each holding based upon breakdown history'*.
- There is a lot of information to consider when buying an animal at market. There are concerns that the information about the TB history of the herd will be lost amongst all the other information.
- Discriminates against farmers whose cattle have had the disease but are now off restrictions.
- Informed Purchasing should only be introduced when there has been a significant reduction in TB in the High TB Areas.
- High TB Area farms should not all be considered as high risk and a system should be in place to differentiate between the risk of farms in the high TB areas.
- The Grant available to livestock markets should be extended. Not all those who have had a grant are displaying the right information, very often the lot number and date of

birth of the animal. They should be inspected to make sure they do display the correct information as they are receipt of public money.

- Farmers (even just those in the High TB Area) should be encouraged to join CheCs which offers a similar risk based scheme to that in place in New Zealand. There are many farms in the High TB Area that have never had TB and it could give them the edge in better returns when selling cattle.
- Many support proposals for improved informed purchasing subject to measures to ensure that data protection requirements and protocols are satisfied.
- Informed Purchasing should also incorporate herd health schemes and testing for other diseases like BVD, Leptospirosis, IBR and Johne's. Healthier animals are less vulnerable and susceptible to illness and disease.
- If IP is to be a success, the stigma with having TB needs to be removed – especially in Low TB Area.
- There is a likelihood that a premium for disease free animals will arise as a result of market forces.

6.9 To revisit the governance of the TB Eradication Programme.

There was no clear consensus on how the Boards should operate with some suggesting that Boards should have more than one area as they could take a broader approach considering different risks. Others suggested that a board should be established for each area.

There was a suggestion that Boards should have a representative in the field of ecology as well as an external oversight. As well as this it was suggested that Boards should also be more action oriented and be able to communicate current policies to the wider community.

Many emphasised the need to better work together with more cooperation between farmers, vets and Government. Some also suggested that TB control should be managed and funded by an independent body.

Comments included:

- Urge Welsh Government to ensure that farming representation is properly and truly representative.
- Marches Badger Group believes that a member of a wildlife organisation, e.g. the Badger Trust should be included in the governance arrangements of the Programme.
- Consideration needs to be given to where the Programme Board sits in relation to other WG stakeholder Groups, e.g. the AHWFG, Strategic Partnership Group and emerging Brexit groups.
- Boards should continue to provide support and chaired by Welsh Government officials or industry.
- The programme needs continuity. A possible NZ style model should be considered and should include power and true cost sharing.

7. Other comments

A number of other comments on the Programme which were not directly linked to a specific proposal were received. These comments have been recorded separately and will be given full consideration.

8. Next steps

The Welsh Government would like to thank everyone who took the time to respond to our consultation on a refreshed TB Eradication Programme. This document and the consultation responses will be presented to the Cabinet Secretary for Environment and Rural Affairs along with recommendations on the way forward. The Cabinet Secretary will make a statement on the refreshed TB Eradication Programme in early May 2017.