



Llywodraeth Cymru  
Welsh Government

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Welsh Government  
**Consultation – summary of responses**

**A Refreshed TB Eradication Programme**

May 2022

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.

This document is also available in Welsh.

# 1. The Consultation Exercise

## 1.1 Background Information

We are grateful to all stakeholders and individuals who provided a response to the consultation.

Our bovine TB Eradication Programme was introduced in Wales in 2008 with the vision of becoming an Officially TB Free region of the United Kingdom.

Since then we have made much progress, and made a number of improvements and changes to the programme which build on measures already in place, and continue to do so. In 2017 a regionalised approach to TB Eradication was introduced, with the creation of Low, Intermediate and High TB Areas. This regionalisation formed the basis of an enhanced approach which saw various measures being implemented through a Delivery Plan.

We know the devastating impacts a TB breakdown can have on farmers, their families and the far-reaching implications this can have across the farming industry. The long term TB statistics show the positive strides we have made in tackling bovine TB in Wales, but we recognise more needs to be done to further strengthen our approach and improved collaboration.

It is clear we can only tackle this disease by working together, and this consultation offered all interested individuals and organisations the ability to provide constructive input into a refreshed TB Eradication Programme and help shape our policies going forward.

## 1.2 Purpose of the consultation

This consultation sought the views of stakeholders from across the animal health/welfare and farming sector on a number of enhancements to the Welsh Government's TB Eradication Programme. These views will help inform the delivery of a refreshed approach to TB Eradication and will build on the programme put in place during 2017.

A Written Ministerial Statement will be made in July setting out further detail on our intended way forward.

## 2. Responses to the Consultation

### 2.1 Consultation proposals

The consultation document set out a number of key areas of the TB Eradication programme for consideration;

#### **TB Testing**

- A. Legal requirement for farmer paid Pre-Movement Testing (PrMT) from herds in the Low TB Area.
- B. Legal requirement for farmer paid Post-Movement Testing (PoMT) for all cattle movements to holdings in the Intermediate TB Areas from High TB Areas, the High Risk Area and Northern Ireland.
- C. Explore the introduction of farmer paid PoMT for cattle movements from an identified TB Hotspot, or an identified high risk herd dispersal.
- D. Not allowing a herd clearing test as a PrMT as we do in persistent herd breakdowns.
- E. What alternatives exist with regards which test(s) can be used for PrMT?
- F. Legal requirement for farmers not to move cattle between test day 1 (day of injection known as TT1) and test day 2 (day of the reading of the test known as TT2) and between blood testing and receiving results.
- G. Consent to collect a sample for the purposes of TB testing or perform a test on a sample.

#### **Informed Purchasing**

- A. Adding a new map to ibovine TB showing the number of years unrestricted cattle herds have been Officially TB Free (OTF).
- B. Mandate provision and display of TB information at point of sale.

#### **Payment for TB affected cattle**

##### **Options for an alternative approach to TB payments**

- A. Table Valuations as per current English system.
- B. Table valuations with an increase to payment based on membership of an approved animal health accreditation scheme.
- C. Payments to be determined by an industry led independent group. An industry Levy would partly fund TB Payment costs.

#### **Explore prohibiting feeding of unpasteurised milk to livestock on OTFW premises**

##### **TB in non-bovine species**

- A. Explore consolidation of the legislative requirements for sheep and pigs into the Tuberculosis (Wales) Order 2011.
- B. Identification of non-bovines for TB testing purposes.

## **Governance**

- A. TB Eradication Programme Board.
- B. Regional Eradication Boards.
- C. Establish a Technical Advisory Group.

## **Other questions**

- A. Effects these proposals would have on the Welsh language.
- B. Any related issues which not specifically addressed in the consultation document.

## **2.2 Respondents**

The consultation attracted representations from a variety of sectors including the farming industry, veterinary profession, livestock auctioneers, wildlife organisations, welfare organisations and members of the general public.

Of the 246 individual responses received:

- 57 were from farmers/keepers
- 9 were from farming industry representative/organisations
- 7 were from livestock auctioneers
- 48 were members of the public
- 23 were from vets
- 20 wildlife organisations
- 1 welfare organisation
- 3 were 'other'
- 78 were not given

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. The details of those who did not indicate a preference to remain anonymous or not have also been removed from the list.

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 being 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 fit best.

Due to the nature of this comprehensive consultation, this summary cannot be an exhaustive record of all issues and comments raised. 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.

In general terms, respondents supported almost all of the proposals outlined in the consultation document. Most comments concentrated around the sensitivity of diagnostic tests, wildlife controls, pressure on the farming industry, and payment for TB affected cattle. There were also comments highlighting shortages in the veterinary workforce.

There was strong support for informed, risk-based purchasing, improving farming practices from the disease risk and environmental point of view, protecting areas with low incidence of TB and reducing cattle movements, which many saw as the main route of disease transmission. There was also a desire to explore the possibility of using non-veterinary (“lay”) TB testers.

## **2.3 Summary of Responses**

### **Q1. Do you agree with the legal requirement for farmer paid PrMT from herds in the Low TB Area? Please explain your reasons**

The majority of respondents supported this proposal. Most agreed that PrMT is a necessary action to prevent the spread of disease and it is only likely to make a difference if it is made mandatory, as opposed to voluntary. Many commented that the fact a herd is located in a Low TB Area does not guarantee freedom from disease, and acknowledged the risk still exists from herds located in such an area. Very few respondents were of the view that this would be an additional cost in already rising expenditure and should not be placed on a farmer. Some felt that, since this is a Government policy, the Government should cover the cost.

Respondents expressed an understanding of the financial pressures farmers are under and that paying for tests would add to the costs, however, this was balanced by the view the additional cost associated with PrMT is likely to outweigh the risks resulting from buying potentially infected cattle in the absence of testing. A minority felt there was a lack of evidence to support the proposal. Others praised the Government for its efforts in eradicating TB so far.

Comments included:

- There should be a one-Wales approach to testing, which would be fairer on all keepers; PrMT should be compulsory for all movements into and within Wales.
- Placing the cost of PrMT on farmers is reasonable, as movements are for the benefit of the farming business and this was more likely to ensure adherence to the requirements; the cost is farmers’ responsibility as those running the business.
- Any legislation that imposes financial or logistical barriers to cattle trade has the potential of influencing farmers’ buying behaviours.
- Making this a legal requirement will help with monitoring and obtaining valuable statistical data on disease prevalence.

- Testing methods should be more sensitive for PrMT (i.e. including IFN-gamma or the Actiphage test).
- Currently the only type of test that can be used for PoMT is the single intradermal comparative cervical tuberculin test (SICCT). SICCT has limited sensitivity and is best utilised as a herd-level test. We believe that there may also be further scope in future to utilise the more sensitive IFN-gamma blood test as part of this process.
- The Government should fund, and continue to roll out, the IFN-gamma test as a more sensitive supplement to the SICCT and explore the potential for wider use of IFN-gamma as part of the testing regime, including PrMT and PoMT and between short interval tests.
- PrMT and PoMT need to be as sensitive as possible. This can be achieved for example by SICCT in combination with Enferplex test. PrMT/PoMT should not be paid for by the farmer, as the problem has been created by poor performance of the official test.
- Agree you might miss early infection but you will pick up infected cattle and that prevents their movement to a new holding where, if they wait 60-120 days for a PoMT, they could potentially infect the herd they move to.
- There needs to be wide understanding of evidence and cost-benefit calculation of any change.
- Impact of additional testing on veterinary resource.
- Government to provide a further analysis to show how effective pre- and post-movement requirements have been to date at reducing incidence of bovine TB in lower prevalence regions. Providing and disseminating an evidence base for the extension of this policy would help maintain trust and goodwill amongst the farming and veterinary communities.

**Q2 Cattle entering the Low TB Area from higher incidence areas need a clear PrMT. Do you agree cattle moving into the Low TB Area from a higher incidence area should also require a PoMT on arrival? Please explain your reasons.**

Most respondents agreed with this proposal believing that the Low TB Area should be protected from incoming disease caused by cattle movements and PoMT could pick up infection that a PrMT has failed to identify. Many felt this would be a deterrent to risky trading, an important measure to reduce the risk of disease spread and a means to identify it early post-movement, although a burden of additional testing on farmers was acknowledged. There was a belief that additional testing is one of the key actions to increase the understanding of TB prevalence and transmission in Wales and to give the greatest chance of finding disease PrMT and PoMT should be deployed.

There were, however, concerns over the cost to farmers. Some felt that the 60-120 days window was insufficient to detect the disease post-movement and consideration should be given to the extension of this window. Many suggested the skin test should be supplemented with either IFN-gamma test or an antibody test to maximise the detection potential. A minority of respondents felt that PoMT was

impractical and PrMT should be sufficient if there was confidence in test performance.

Other comments included:

- PoMT is not necessary in all circumstances and should be applied to higher-risk moves.
- Precautionary principle and frequent testing regime should be applied to moving cattle.
- Some suggested regular IFN-gamma testing.
- TB has increased in the Low TB Area and therefore it will be difficult to tell if a positive PoMT is as a result of an infection contracted at the new holding or from the old holding. Realistically, quarantine of these animals would not be carried out sufficiently. PrMT and trace testing are simple and effective measures to limit spread of disease from these movements.
- Some respondents questioned whether moving cattle from higher risk areas should be happening at all.
- Some suggested that scientific data on the benefits vs. cost to the industry is required to support this proposal.
- Six monthly testing should be introduced after a PoMT to protect the Low TB Area.
- Suggestions to read bovine reactions only as a routine, but also concerns over identifying more positive animals due to increased sensitivity.
- Farmers should be encouraged to join the CHeCS scheme and carry out PoMT voluntarily rather than Government legislating for it.
- Concerns over vet shortages to deliver PoMT, whilst acknowledging that the relationship between the farmer and private vet is beneficial.
- Positive PoMT would be difficult to interpret with regards to the origin of infection.
- Impact on businesses who buy large numbers of cattle at different times.
- We believe the extension of mandatory post-movement testing of cattle moving into the Low TB Area from a higher incidence area is a welcome ambition. How this proposal is introduced should be considered. Particularly, there needs to be an understanding of veterinary capacity to undertake this additional testing.

**Q3 Do you agree cattle moving into the Intermediate TB Areas from higher TB incidence areas should have a PoMT? Please explain your reasons.**

The split between those respondents who agreed and disagreed with this proposal was very close to that in response to Q2. Views and comments were similar to those expressed to Q2 also. The majority of respondents agreed to this proposal and many felt that *any* cattle moved from higher incidence areas should be subjected to a PoMT. Questions were asked why movements from high risk areas into lower risk areas were allowed at all. Some suggested that any movements between any areas should be subject to PrMT and PoMT. Those who supported the proposal also emphasised the importance of biosecurity.

Comments included:

- Annual testing, or even 6-monthly testing, instead of PoMT.
- Practical challenges and additional burden on farmers.

- Credit should be given to those who are part of CHeCS who should not be required to carry out PoMT.
- Super severe interpretation suggested for PrMT instead of PoMT.
- 95% of herds in Wales are TB free, which makes this proposal disproportionate.
- 6-12 months trial period suggested, at Government's expense, to assess the effectiveness of this measure before placing the cost on farmers.
- This measure discourages purchases from a High TB Area more generally with no regard for the individual herd's history, negatively impacting the producer.
- The longer a herd has been free of bovine TB the lower the risk of their cattle being undetected carriers and this could be acknowledged again through the Welsh Government prioritising risk-based PoMT.
- These procedures are primarily designed to protect the low incidence regions and nations of the UK from the introduction of infection.

**Q4 Do you agree with Welsh Government exploring the temporary introduction of PoMT of cattle originating from an identified TB Hotspot, or high risk herds? Please explain your reasons.**

The majority of those who responded to this question agreed it was a good idea to reduce the risk of disease spread from hotspots. Many saw it as a discouragement from high-risk trading, whilst emphasising the importance of biosecurity. A large proportion of those who were in favour suggested that this should be a permanent measure. Some believed that PrMT was insufficient. Many also suggested that clear definitions of a TB Hotspot and a high risk herd should be published, and information about the risk in a particular area/herd should be easily accessible. A few individuals raised questions about how TB Hotspots would be identified on a map.

Concerns raised included complexity to administer this measure, particularly how would keepers be notified that they would need to perform a PoMT on their animals and how would it impact cross border trading. Some felt that more scientific data was needed before implementation. Again, there was concern that a positive PoMT would not identify where infection had come from (farm of origin or destination farm).

Comments included:

- Some, including a minority of those who supported the proposal, were concerned about the practicalities, for example quarantine while awaiting a test.
- Concerns over the logistics of finding out the status of the animal(s) before purchase.
- PrMT should be more sensitive to avoid the need for PoMT.
- Movements from hot-spots and high risk herds should not be allowed at all.
- Concerns about the timely capture of information in light of TB Hotspots and herd status changing over time.
- Some wanted to see an analysis of the impact of PoMT on the Low TB Area before implementing such a measure, to assess its proportionality.
- Choice should be left to farmers who they want to buy from rather than grading risk areas.
- Concerns about the impact on cross-border trade if animals from England test positive post-movement.



- Current movement reporting and recording arrangements are not suitable for the implementation of this proposal; consideration should be given to a working group with input from EID Cymru.
- We would recommend this move, and would see it as a move towards a dynamic, quick-acting bovine TB control policy which is not blanket for all herds, but identifying those at risk and thus ensuring the most effort is put in to detecting the disease where it is most likely to be.

**Q5 If you answered yes to Q4, where do you feel this policy would have the most impact? (For example High TB Areas, Intermediate TB Areas or Low TB Area).**

Of those who responded to this question, the majority felt that the greatest impact would be visible in the Low TB Area, followed by All Wales, with small percentage believing that High TB Area and Intermediate TB Areas would be impacted most. Some respondents misunderstood the question as being 'which area would be impacted most adversely.'

Comments included:

- Greater communication and clarification is necessary with regards to the definition of high risk herds and high risk areas.
- Important especially where incidence is higher in wildlife.
- We would recommend this move, and would see it as a move towards a dynamic, quick-acting bovine TB control policy which is not blanket for all herds, but identifying those at risk and thus ensuring the most effort is put in to detecting the disease where it is most likely to be.
- Considering such Hotspots and high risk herds can have wide-reaching dispersal and thus potential seeding of bovine TB, we would suggest it is likely to be impactful in all areas. What constitutes a "Hotspot" might be different in different TB areas but where a particular area or herd poses a significant risk relative to those around it, it seems reasonable for steps to be taken to mitigate that risk.

**Q6 Do you agree with the proposal of not allowing a herd clearing test as a PrMT as we do in persistent herd breakdowns? Please explain your reasons**

Although the split between those who agreed and disagreed with the proposal was very close, the majority were still in support acknowledging that there may be undisclosed infection present in the herd even after the clearing test. A proportion of respondents understood this proposal as extending the period where a herd will be under TB restrictions.

Comments included:

- No confidence in the clearing test if additional test is necessary for the purpose of movement; this would undermine current testing regime.
- Potential welfare issues due to overstocking and lack of adequate housing facilities.
- Financial impact due to inability to sell once restrictions are lifted.

- Some suggested supplementing clearing skin test with IFN-gamma for greater confidence.
- Super-severe interpretation early in the breakdown should be used instead to remove all infected animals before clearing test.
- Little impact if animals are still exposed to wildlife source.
- It would have a serious effect on farmers' self-esteem/motivation/mental health as it would be another hurdle to cross.
- We believe there may be merit in slowing down the movements off farms that have regained OTF status.
- Before expanding this requirement, Government should provide an evaluation of the risk posed by animals moved off-farm shortly after receiving OTF status. To support this, the current Welsh Government policy should be evaluated, and those findings published to understand the outcome of that policy.

**Q7 If you answered yes to Q6, where do you feel this policy would have the most impact? (For example High TB Areas, Intermediate TB Areas or Low TB Area, or in specific circumstances).**

The vast majority of respondents who answered this question felt that the policy would have the greatest impact in High TB Areas, followed by All Wales, with a few respondents stating that it would impact Intermediate TB Areas and Low TB Area. Many of those who believed that High TB Areas would be impacted most also referred to TB Hotspots. Again, some respondents misunderstood the question as being 'which area would be impacted adversely' as opposed to where would the policy have the greatest impact. One respondent believed that there would not be an impact anywhere.

Comments included:

- Specific circumstances should be considered, such as herds where breakdowns extend beyond two short interval tests, or herds with confirmed disease.
- Intensified farming and increasing stocking densities are responsible for disease spread; farming should move towards more sustainable way.
- This additional testing policy will have greatest impact at a herd level, regardless of farm provenance.
- Impact in Hotspots and other pockets of disease with higher prevalence.

**Q8 Do you agree with the statement 'the test used as a PrMT should be more sensitive and therefore more likely to identify truly infected cattle but acknowledge this would be at the expense of identifying more false positive cattle'? Please explain your reasons.**

The majority of respondents agreed with this statement. Proportion of those who were in agreement felt that, although there would be more false positive animals identified, this was better than missing truly infected ones, that it was particularly important for movements from High TB Areas to Low TB Areas and it should go hand in hand with the improvement of OV standards. Many felt that identifying more false positives is an inevitable necessity if the disease was ever to be eradicated.

Some felt that this was a relatively small sacrifice in the scale of the problem. The minority who did not support this statement said that if such a measure was to be introduced, this would compromise confidence in the current testing regime. A small proportion of respondents understood this statement as merely a severe interpretation of the skin test. Some felt that a longer term control scheme should be adopted where the numbers of high risk infected animals are managed down over a period of time. Even though most respondents agreed with the statement about increasing the sensitivity of testing, there were concerns that the cost of this could not be met by the industry alone.

Some believed that the four administrations should collaborate and look strategically into the TB tests deployed. Others believed that if the IFN-gamma test was used at the start of a breakdown, it would reduce the duration and severity of a breakdown, albeit at the expense of false positive cases. Some wanted private blood testing to be sanctioned for animals to be introduced into the herd, so that the farmer has some discretion – both the buyer and seller would need to agree to the potential repercussions.

Comments included:

- Positive animals to more sensitive tests should not be slaughtered but just stopped from being sold.
- Antibody, IFN-gamma or Actiphage tests should be used to increase sensitivity.
- Some felt the right balance is needed between sensitivity and specificity, and that benefits of increased sensitivity could not justify the risk of finding more false positives.
- Concerns about compensation payable for the increased number of animals identified as positive.
- Impact on veterinary resource to manage increased number of breakdowns.
- Modelling necessary to explore the benefits of different test combinations; should be science- and evidence-based, with cost-benefit analysis.
- Consequences of false positives may be disproportionate to the cost benefit.
- Supplementing with interferon-gamma test will help detect more infected animals and reduce the risk of disease transmission through movements.
- PoMT at severe interpretation will stop the onward sale of any borderline IRs with risk of potential TB spread.
- More funding needs to be made available for research to improve the sensitivity of tests without the increase in false positives.
- We believe that the success of any system of bovine TB controls in cattle is underpinned by our ability to detect the presence of infection, primarily at herd level but also in individual live animals. It is vital to understand the specific context and establish clear goals before considering which test or tests should be applied. When interpreting tests for an individual animal (positive or negative predictive value) it is important to consider the likely prevalence of TB, as well as the sensitivity and specificity of the test. Different tests have different strengths and weaknesses that determine their suitability in different situations.

- Shifting the interpretation of SICCT to be more sensitive but less specific will find more infected animals as well as create more false positive results. However, at this point in the bovine TB disease control and eradication process, there is merit in seeking to prioritise sensitivity to unearth infection as part of statutory pre- and post-movement testing.
- IFN-gamma has become a key part of the bovine TB programmes in all four administrations of the UK. Government should build on the success to date and continue to fund and roll out the IFN-gamma test as a more sensitive supplement to the SICCT and explore the potential for wider use of IFN-gamma as part of the testing regime, including pre- and post-movement testing. There is also a benefit to using the OIE-validated antibody blood tests (IDEXX or Enferplex). Using a different test alongside SICCT may detect a different subset of the infected population, so the combined sensitivity of both tests is likely to be greater than either alone.
- We believe that that the current skin test is not adequate to be used at an individual animal level and only gives an accurate indication of whether a herd is infected. We would highly recommend moving to a more appropriate test for individual animals with a higher sensitivity since the implications of moving an undetected, infected animal into a currently uninfected herd is significant.

**Q9 Do you acknowledge that if blood testing (gamma or IDEXX) testing is deployed as a PrMT, there may be an additional cost to testing, which could not be met by Government? Please explain your reasons.**

Whilst most respondents agreed with this statement, comments indicated mixed views with regards to who should bear the cost; the majority stated that it should be farmers, whilst others said that the cost should be shared between the Government and the industry. Those who agreed were also of the view that requiring farmers to pay would encourage wiser purchasing practices, better biosecurity, change of behaviour and better compliance.

Some respondents believed that some cost sharing may be possible on a case by case basis if the farmer could demonstrate their effort in controlling the disease and improving biosecurity. Some thought that the low specificity of blood tests, if used as a PrMT, would result in large numbers of herds being put under restriction and would reduce compliance and belief in the system. Some were concerned about the likely impact of such a policy on false positive results being generated but understood the practical benefits, such as only having to gather the animals for testing once.

A proportion of individuals commented on Government's refusal to tackle TB in wildlife, while imposing more and more restrictions on cattle keepers which some see as ineffective when the pool of TB in wildlife is allowed to persist.

Comments included:

- Additional pressure on farmers to pay for tests would impact on mental health.
- Recognition that PrMT has wider advantage than just to the farmers concerned.
- Some felt this type of testing should not be used as PrMT and that Actiphage should be used instead.

- Price should be kept the same as that of the skin test.
- If the measure is Government-imposed – Government should pay, if farmer wishes to do the test – farmer should pay.
- Movements for sale are the farmer's choice and it is in the farmer's interest to meet the cost as a long term investment. TB is a business risk as should be managed by the industry at their own expense, via insurance for example.
- Farming is a business and farmers should not constantly rely on Government support.
- Concern about laboratory capacity and time it takes for results to be available.
- Incentivising farmers for low risk trading, good biosecurity and good animal welfare practices could be a way to manage the increased costs of additional blood testing.
- Concerns over stand-alone IFN-gamma due to sensitivity issues, and in combination with SICCT it would increase the cost for the farmer.
- Government should bear these costs to increase farmers' engagement, confidence and participation.
- IFN-gamma should only be reserved for severe breakdowns.
- In relation to the pre movement testing (PrMT) of animals a thorough investigation and analysis (including cost benefit analysis) should be undertaken to consider the most appropriate test for the PrMT. Consideration needs to be given to the skin test and whether to use at standard or severe interpretation or whether another test altogether would be more appropriate. As part of this review consideration of the consequences of a change in test for the buyer, seller and within business moves (where a PrMT is required) need to be considered. A technical advisory group that includes members of the farming and veterinary profession should consider the options in more detail.
- IFN-gamma has become a key part of the bovine TB programmes in all four administrations of the UK. Government should build on the success to date and continue to fund and roll out the IFN-gamma test as a more sensitive supplement to the SICCT and explore the potential for wider use of IFN-gamma as part of the testing regime, including pre- and post-movement testing.
- The low specificity of the blood tests would result in chaos if these were used as pre-movement tests.

**Q10 Do you agree with the legal requirement for farmers not to move cattle between test day 1 (day of injection known as TT1) and test day 2 (day of the reading of the test known as TT2) and between blood testing and receiving results. Please explain your reasons.**

This proposal was met with an overwhelming support from the respondents, who felt that this was a logical and a common sense approach to prevent the spread of disease. Many believed that this requirement was already in place. Respondents stated that movements before receiving test results would be counterproductive and would undermine surveillance.

Comments included:

- Exemptions should be given for welfare reasons and for movements to slaughter where a slot has been booked in advance, and allowances for deaths and accidents between test dates/tests and receipt of results should be considered.
- A couple of respondents stated if an animal is booked for slaughter in advance it should not wait for results as it affects cash flow.
- Concerns about resampling for blood tests and subsequent delays in reporting the results.
- Multispecies Database Wales should have some means of identifying animals which have been subjected to a test, but for which the result is pending.

**Q11 Do you agree with the expansion of the current prohibitions in the TB (Wales) Order 2010 (as amended) to include requiring consent to collect a sample for TB testing and perform a TB test on a sample? Please explain your reasons.**

The majority of respondents agreed with this proposal on the understanding that it was essential for disease control, monitoring and effective communication critical for disease management and eradication. Many agreed that the process should be overseen and managed centrally and felt that unauthorised private sampling would complicate matters. Some responses suggested mixed understanding of the question in terms of the test category (i.e. non-validated tests or private tests) and the person(s) giving the consent (i.e. the Government or a farmer).

Those who disagreed with the proposal believed that it was a requirement to notify the results to the authorities already and the provision was not required. Some felt that the approach may impact vets' ability to take responsibility for their client's herds if they are denied access to new tools and that extended consultation with officials should not form part of the process of conducting diagnostic tests. Some also felt it would discourage farmers from private testing of animals for individual reasons and that increases in testing should be seen as a positive situation, but acknowledged that results must be shared with WG/APHA. A proportion of respondents stated that a more collaborative approach between private test providers, farmers, vets and WG would be preferable.

Comments included:

- Testing and reporting must be transparent and regulatory body must have access to results.
- Proposal prevents hiding disease from the Government.
- For notifiable diseases, only approved labs should test and results must be reported, with restrictions applied on the herd where appropriate.
- Farmers should be free to test for any disease without Government's intervention, based on advice from the private vet.
- Approval, recording and access should be through one platform, as the only way to obtain a full picture.
- Farmer should be entitled to pay for an independent test, farmers need control over their businesses.

- Sometimes animals are already handled for other reasons and it is an opportunity to take a sample and ask for permission later.
- Some saw it as limitations to research, limiting proactive ideas and new tests opportunities, whereby farmers may wish to try new tests at their expense, the results of which could be used in research into TB.
- The Welsh Government should work with vets (and any others that might be taking and testing such samples) to ensure the process by which this permission is sought is simple, avoids bureaucracy and does not stand in the way of proactive producers and their vets doing additional bovine TB testing on their farm.
- Welsh Government needs to be informed of the results of all TB testing in Wales however, this legal requirement goes too far and may discourage farmers from privately testing animals for individual reasons. Any increases in testing should be seen as a positive although the results of these tests should be shared with Welsh Government/APHA.

## **Informed Purchasing**

### **Q12 (a) Do you agree with the proposals outlined for:**

#### **- Adding a new map to ibTB showing the number of years unrestricted cattle herds have been Officially TB Free (OTF).**

This proposal received overwhelming support from the respondents who recognised it as important information that should be available to purchasers and a positive action to allow farmers to make more informed decisions at the point of sale. It was recognised that it would be of the benefit to the industry and would drive risk-based purchasing behaviours.

It was emphasised however, that these benefits would likely be visible only if the potential buyers act on the information. Most respondents also said that information must be easily accessible by individuals with all levels of IT skills and must be up to date on the day of the sale. A small proportion of respondents stated that such information should only be available to the registered keepers, with login and password access. Many respondents provided a single response to Q12a and Q12b in support of the proposals. Some believed that discussions needed to be had with market operators, auctioneers and private sellers to ensure information is delivered consistently across the different modes of sale. Some respondents expressed concerns over data protection and GDPR more generally.

Other comments included:

- Training should be available through TBAS (TB Advisory Service) or similar service.
- An easy to use app would be useful.
- Information made publically available may motivate keepers and focus their minds to take control of TB situation on their farm.
- Uptake and use of the website should be promoted; it needs to enable proactive buyers find information easily.

- Display of such information will make market too competitive.
- Infringement on the owners' privacy; information could be used inappropriately. It should be up to the buyer to find out from the seller what their TB status is, and if the seller is unwilling or unable to disclose, then it would be up to the buyer if they want to proceed with the sale or not.
- A few respondents questioned the proportionality of this approach if a herd only had one positive animal, or for herds with unconfirmed disease.
- Use should be made of the Government Gateway and RPW Online with password access; data should not be readily available to people who have no interest in using it for the purpose which it has been designed for.
- The buyer has every right to have the information provided to him at the point of sale.
- Regarding the inclusion of numbers of years a herd has been free of bovine TB on ibTB we feel this data is readily available and thus it should be incorporated to ensure potential buyers have as much data available to them as possible, and can make an informed choice.

**Q12 (b) Do you agree with the proposals outlined for:**

**- Mandate provision and display of TB information at point of sale**

As for Q12(a), many respondents provided a single response to Q12a and Q12b. This proposal was met with an agreement from the vast majority of respondents, who felt that it was essential, it would be a deterrent to the risky purchasing behaviour, it would improve transparency, support effective risk-based trading by allowing farmers to make informed choices and to encourage them to pay greater attention to disease control on their farms, or risk lower prices for their stock.

Some found it invaluable in fighting the disease. Some felt that herds and animals should be risk rated and this information should be provided at the point of sale to publicise the fact that there can be low risk herds and low risk animals in high risk areas, and vice versa. Respondents believed that the existing systems, such as the Bovine EID, should be used to facilitate the display of the information. Some were concerned about the impact of this proposal on businesses which suffer recurrent TB breakdowns and believed that confidence needs to be maintained in the system for both buyers and sellers. Others felt that buyers should have access to the additional information but sellers should be supported financially and practically to keep TB out of their herds. Some felt that further information than that suggested in the consultation could be provided at the point of sale. Very few respondents felt that a valid PrMT should be enough.

Comments included:

- It would be useful for other diseases also, such as BVD or Johne's.
- App is necessary to include the same information for direct farm-to-farm sales, or the problem will be pushed elsewhere.
- This may leave some traders and dealers out, or put some sellers at a disadvantage.



- Concerns that if this is not introduced in England, keepers will take cattle to English markets where the information is not displayed, spreading disease this way anyway.
- Information must be easily digestible in a short space of time during an auction, and must be up to date on the day of sale – ideally from a central database.
- Only the time since last breakdown and the date of the last herd test should be displayed.
- Positive communication with auctioneers is vital to get the best implementation of this proposal.
- Data must be up to date and timely and presentation of data needs careful consideration.
- May also consider encouraging display of information concerning whether the herd is doing any additional testing, and if so what, and the date of the last of such tests; in addition to whether animals have been acquired from higher-risk herds and the last time such animals were introduced to the herd.

**Q13 In the future, do you believe there should be implications for cattle keepers who fail to take notice of TB information, and make a purchase regardless of highlighted risks? Please explain your reasons. What do you believe these implications should be?**

Whilst the majority of the respondents agreed, there were mixed views on this proposal. Many agreed that voluntary measures were ineffective. Many were also of the view that the taxpayer should not bear the cost of the consequences of risky buying practices. Those who disagreed with the approach were concerned about the market for selling cattle from High TB Areas – if these animals have undergone a PrMT and a PoMT and the keepers have done all they can to mitigate against the risk, there should be no consequences for the buyer.

There was a concern about the complexity of such a policy to implement, how it would be evidenced and policed, and if it was to be introduced at all it should be on a case by case basis. Some believed that focus should be on providing information on the status of cattle alongside advice and guidance which will have greater impact on encouraging keepers to make the right buying decisions.

In terms of the implications, most respondents who agreed with the proposal suggested that there should be reduced compensation for those who fail to take notice of TB information. This was followed by, in this order, views that farmers would have to pay for any additional testing required as a result of risky purchases, receive penalties, or have their compensation completely withdrawn. Some felt that whichever implications are introduced, these should be clearly explained in advance. A few individuals stated that it would be unfair to penalise keepers who struggled to eradicate TB from their herd. Some believed that a full disclosure of TB history in all areas should be made, including information about unrestricted farms close to breakdowns.

Comments included:

- There should be trading restrictions and a ban from keeping cattle for serial offenders.
- Cattle keepers must be held accountable for disregarding measures designed to reduce the spread of disease.
- One respondent was of the view that education was more important than penalising.
- Some people have no choice but to purchase from high risk areas to continue their business as sometimes good quality stock is only available in high risk areas.
- There is a risk that this measure will create a two-tiered market whereby stock from TB-free herds will be unsaleable due to the TB history from the surrounding area.
- A working group has been suggested to discuss risk-based trading before any proposals are made.
- Legal challenges are likely if this proposal is introduced.
- The dairy and beef industry relies on cattle movements and a (still relatively) free market. There should be no implications.
- Cattle keepers should be able to make informed purchases and should do so using a risk-based approach. However, we do not think there should be implications for cattle keepers who purchase cattle who are deemed “risky” by Welsh Government/APHA.
- If a cattle keeper has done all they can to mitigate risks the risks of their cattle becoming infected with TB and they have complied with all the testing requirements, it does not seem fair that Welsh Government will penalise potential buyers. We argue that advice and guidance alongside information of the status of cattle on sale will have the greatest impact upon encouraging farmers to make the correct decision for their business.
- We support expanding ‘earned recognition’ policies through compensation and testing policy.
- It is in the long term interests of all that higher risk (and likely lower cost) animals are not purchased without effective steps being taken to mitigate the risk. Previous enforcement action taken on farmers in Wales for misrepresenting cattle status or test information clearly shows there are some farmers willing to risk the bovine TB free status of cattle in Wales. Only strong enforcement action and clear implications for ignoring TB information can ensure that all cattle keepers follow the rules and so ensure the Wales cattle herd moves towards a bovine TB free status.

### **Payment for TB affected cattle**

#### **Q14 The Welsh Government proposes to link TB payments to implementation of disease prevention and control practices. What are your views on this?**

Most respondents agreed and said that it was a fair, essential, sensible, and the right and proactive way forward. Many saw it as a welcomed approach from the Welsh Government, an absolute must, long overdue, and much needed to encourage farm businesses to understand and practice sound biosecurity. Many also stated that it

made a good economic and business sense and highlighted that many farmers already follow good practices, so this should not be a problem. Some felt that it was simply not right for the taxpayer to compensate for poor purchasing behaviour.

A few respondents suggested that payments should be withheld as penalty for non-compliance and good behaviour should be rewarded. Some suggested that accreditation schemes are a way forward to enforce the requirements and that currently insufficient incentive exists to stop poor biosecurity practices. A minority felt that farmers are not responsible for the spread of disease. Concerns, however, were raised about the nature of disease prevention and control measures and that measures must be easy to adopt, cost effective and demonstrate common sense. Concerns were also raised that on occasions there are delays (i.e. in reactor removal) on WG/APHA side, which are outside the farmer's control and in such situations farmers should not be penalised. Some felt that in the absence of being able to accurately quantify risks on individual premises it was inappropriate to link disease prevention and control practices to TB payments. A minority felt that there was little point in implementing this proposal if wildlife is not being addressed.

Comments included:

- Putting more pressure on farmers, particularly those living in a high-incidence area where the disease situation is not their fault.
- Penalising poor behaviour may lead to concealment of wrong doings, so needs to be monitored and regulated.
- This measure should be for recurring breakdowns only.
- Farms should be graded based on biosecurity and slurry management.
- There should be a robust appeals procedure.
- Lack of mention about reducing compensation for non-bovines.
- One respondent felt that linking TB payments to disease prevention will never succeed.
- Biosecurity practices need to be clear and thorough, and laid out in a way that is easily measurable to determine who is adhering to the best practice principles.
- Rewarding responsible cattle movements is a greater incentive than the imposition of penalties.
- Many farmers adjust their infrastructure to improve biosecurity and they still get disease, so it is unacceptable to link payments to prevention measures.
- Wildlife access is impossible to control at pasture; there is a requirement from retailers and expectation from the public that cattle graze for a certain period of the year.
- Support and advice needs to be provided first before penalties are considered; penalties should be for repeated offenders.
- Although we know what the risk factors for TB are, in most cases it is impossible to confidently find the source of an outbreak. We are still unable to quantify risks accurately on individual premises, therefore linking TB payments would be inappropriate.

- We support an approach that rewards responsible behaviours such as the implementation of disease prevention and control practices beyond responsible movements.
- Government may propose a role for the veterinary profession to sign off on the implementation of appropriate measures. Private vets are trusted advisors to farmers and uniquely positioned to offer advice. Government should ensure that the monitoring of this proposal should in no way undermine that trusted relationship.

**Q15 Do you agree/disagree with any of the 3 proposals outlined in section 7? Please explain your reasons.**

Mixed views were received on the 3 proposals. Some felt that the table valuations system would be unfair to implement as paying average values for cattle would not encourage keepers to invest in their stock in terms of genetics and careful breeding programmes. However, a number of individuals favoured the table valuation due to its simplicity to implement and understand – on the basis though that tables are regularly reviewed to reflect up to date market sales data. Some also identified that using a table valuations system would reduce the time it takes for a TB reactor to be removed from the farm. Some thought table valuations plus a top up for being a member of an accreditation scheme would be fairer than just straight table valuations, but concerns were raised that there is no evidence to suggest membership of these schemes benefits TB eradication.

Some believed the industry levy would be attractive in the longer term because it involves the industry sharing some responsibility. One respondent believed however, that the industry levy proposal was not directly comparable to the NZ system, whilst another felt that more detail was needed on NZ system to form a view. Some believed that an introduction of a NZ type system of compensation would need to be accompanied by active farmer involvement in designing a better eradication policy. In the order of the level of support from respondents for each option, an industry led independent group with industry levy (option C) as the independent body having the power to hold farmers accountable, with clear guidelines and terms of reference given by the WG, was the most popular option; followed by table valuation with an uplift for a membership in an accreditation scheme (option B), with straight table valuation (option A) receiving the least support. From the collective responses submitted by some veterinary bodies, the majority agreed with option A, followed by option B and option C receiving the least support. A proportion of respondents disagreed with all three options and were in favour of maintaining the current system of valuations.

Two respondents agreed with all three options.

Some felt that the governance arrangements could be made tighter so that valuations are monitored by a panel. Concerns were raised by the veterinary profession that any move to table valuations would adversely affect the role of the private vet and the relationship with their clients, and that it was likely to affect the

welfare of the vets undertaking the test due to the potential anger and stress put on the farmer, although it was questionable if this stress may influence the results of the tests. Some highlighted emotional/health impact of this proposal on farmers and their families.

Comments included:

- Table valuation does not improve standards because it does not reward best practice, allowing sub-standard practices to continue.
- Table valuations underpay for good stock, overpay for poor stock, and go quickly out of date due to the continuously changing market.
- Membership in assurance/accreditation scheme is a good idea, but it should be standard practice and should not be rewarded, and payment should be reduced if a keeper is not a member.
- System should focus on penalising bad behaviour.
- Levy paid by 100% industry, but compensation paid to a small percentage may not be proportionate.
- A couple of respondents were of the view that it was unfair to expect farmers to contribute to their own compensation.
- One respondent felt that option C would be open to abuse and subjectivity and would have to be carefully regulated and monitored.
- The independent group (option C) is too complex and will be slow to implement.
- One respondent suggested that there should be a robust appeals procedure for exceptions.
- One respondent submitted that there was not enough compensation paid currently.
- Option C would add a layer of cost.
- Option B is acceptable, but there were concerns about annual inspection visits due to the commercial interest between the inspector and the keeper.
- If option C is to be implemented, then industry should have more influence on policy making.
- Welsh Government and industry should endeavour to educate farmers about the benefits of accreditation schemes, but these should not be the basis for payment for cattle slaughtered due to TB.
- Option C would result in the industry sharing responsibility and may be the way forward in the longer term. For the immediate future Option B is preferable to Option A. The money saved should be reinvested into bovine TB control.
- It is not fair for the better performing businesses or the taxpayer to have to subsidise poor performance.
- If tabular system of valuations is to be implemented, then at the very least the system should make some allowance for the quality, condition and productive nature of the animal.
- We support an approach that rewards responsible behaviours through a system of 'earned recognition' that considers all aspects of the control programme including compensation. Therefore, we would support an exploration of the aspect of the second proposal outlined in section 7 where

there would be an increase to payment based on membership of an approved animal health accreditation scheme.

- We believe that option C is appealing in its manner of allowing industry to set its own rules and guidance within certain thresholds which must be followed. This was also recommended by Sir Charles Godfray in 2018 and appears to have had some success in New Zealand. Nevertheless, if this is not favoured, believe the option B would be a good balance between providing industry with a choice of schemes to be members of, whilst having overview of accreditation of schemes to ensure overall equality between what is expected and asked of producers.
- Table valuations is the best option. It is simple, straight forward and also cut out the cost of the valuations. It would also create reasonably equal payment terms with England.
- Fear it will put vets off testing even more. If you want consistent high quality testing as the back bone of your testing programme you will be wise to consider the vets' welfare too.
- The present system pays the market value, so those who have poor stock will get a poor price, while those with good stock will be properly compensated. This approach has been agreed for many years and provided it is carried out correctly it is fair to everyone.
- Moving to a tabular or a restricted system will lead to unfair decisions being made particularly for animals with organic status or of high genetic merit where market information is slim and where tabular or other reference systems would not be appropriate. Instead, the current system should remain in place but the governance around it should be tightened so that valuations are routinely moderated through an independent valuation panel. This will ensure that cattle keepers are adequately compensated for the animals that they lose whilst the state can be assured that they are not being overcharged in the process.

**Q16 Annex 1 to this consultation sets out all proposals considered by the TB Eradication Programme Board. Are there any other proposals you feel should be explored? If so, please provide details.**

A number of respondents understood this question to be wider than proposals for the payment of TB affected cattle. Comments on the wider programme have been included as part of question 26. The majority of those who responded to this question felt there were other proposals that should be explored, and offered the following suggestions and comments:

- An all Wales approach that focuses on creating a table for various animal breeds and systems (rearing, finishing and dairy) and pays the overall market value average for that particular system, based on average weights or the particular farm and slaughter price (which can change year on year).
- Accreditation scheme with Standard Operational Practices for animal welfare, land management and encouragement of biodiversity.
- 50% compensation package as high compensation does not incentivise taking responsibility for their own breakdowns.
- 75% of value paid, with remaining 25% paid to farms that are part of accreditation scheme to manage biosecurity risk.

- No need for new assurance schemes, rather for existing schemes to be fit for purpose. Due to the huge administrative burden of these schemes they often fail to genuinely achieve the intended outcomes.
- Insurance scheme to support farmers.
- Transfer all of TB eradication over to the industry with no barriers to tackle all sources of infection.
- Further discussions with the Welsh Government on the future of TB compensation in a manner which offers this issue due respect and consideration.
- The only acceptable option is to carry on with individual valuations but the future production losses must also be paid.
- Table valuation for commercial stock and valuers for pedigree.
- Set up a TB eradication company. This company should be funded by Welsh Government to the same amount that you are spending on TB now for the next 5 years. This company should also be funded by farmers in 2 forms. A) animal health nominal levy of say £5 per head on each holding. B) TB levy raised for every “on movement” registered through BCMS (doing it this way does not penalise those who maintain a closed herd. It also catches the dealers who can purchase animals and move them around before next test). The bosses of this company should be made up of “actual” stakeholders. These being farmers, farmer vets and APHA vets.

### **Explore prohibiting feeding of unpasteurised milk to livestock on OTFW premises**

#### **Q17 Do you agree with the proposal of prohibiting feeding of unpasteurised milk to livestock on OTFW premises? Please explain your reasons.**

Most respondents agreed that it is a very important element of TB eradication, which adds to the battery of the existing preventive or mitigating measures. However, a proportion of respondents suggested that farmers should be given financial support to help with the cost of buying milk pasteurising systems. Whilst this proposal refers to dairy herds, some respondents understood it as a measure for all types of cattle, including beef suckler herds, and felt that that it would be impractical to implement it in such herds. Some felt that the full cost benefit of such a policy should be investigated first, including an assessment of the practicality to implement in small businesses. Some agreed with the approach as long as the welfare of calves was not impacted in terms of them receiving colostrum, whilst others raised concerns that the proposed measure had a potential to compromise calves’ welfare in that they would be deprived of colostrum. A few respondents also expressed concerns regarding the monitoring of this prohibition.

Many highlighted that, in most cases, formula is used to feed young calves these days, but agreed that if cow’s milk is fed then it should be pasteurised. Some highlighted that it is, in fact, a requirement of some farm assurance schemes to feed milk formula. Small proportion of respondents called for more evidence as they did not believe that this route of disease transmission has been scientifically proven. Others felt this was not a big problem in any case and not a priority issue.

Suggestions were made to explore leaving calves on TB-free mothers for a longer period, and that milk from unaffected cows could be used to feed calves. Others felt that it was not viable to feed bull calves or dairy-cross-beef calves milk formula due to the cost involved. Some believed that this should be decided upon by the farmer.

Other comments included:

- The measure should be applied on individual basis rather than as a blanket approach.
- Pasteurisation of milk will help with Johne's disease as well.
- We disagree with this proposal because of the importance of feeding colostrum to the welfare of the new-born calf. Our accreditation scheme will enforce the feeding of colostrum to calves, so there would be a total contradiction of directives here.
- WG to provide funding for milk pasteurisers to be supplied to farmers. This would also kill off other pathogens. I would rather this than having to purchase milk powder as milk powder is not a good substitute and takes time to prepare.
- OTFW herds should not be feeding unpasteurised milk to livestock. In our understanding, this is not common practice in Wales. However, where this does happen it is appropriate that APHA vets have a mechanism to stop the practice before any consequences emerge.
- To support this, the current Welsh Government policy should provide a clear evidence base to show the need for an intervention.
- We agree with this proposal in part. The major risk factor is the feeding of unpasteurised waste milk to calves, rather than the feeding of unpasteurised milk from the bulk tank to calves. We would recommend that no producer, regardless of bovine TB status, feeds waste milk to calves. As such, prohibiting the feeding of unpasteurised waste milk on OTFW premises seems reasonable. Before extending that to unpasteurised milk from the bulk tank, there would need to be evidence suggesting that this, too, can be a source of infection to calves.
- We would flag that if unpasteurised milk from high risk cows is a risk to calves then such farms should be practising strict snatch calving from the high risk cows when they calve, otherwise the calf will potentially be exposed in the first few hours of its life. If snatch calving is practised this would have to be carefully managed on farm to ensure calves got enough colostrum of a high quality from another source (since the maternal colostrum would be a potential source of infection). Although we would ideally like calves to be able to spend time with their mothers after birth we recognise that snatch calving as a temporary measure for infectious disease control may be necessary but that the producers should be aiming to stop this practice as soon as they are able.

## **TB and non-bovine species**

**Q18 Do you agree with the Welsh Government exploring the consolidation of the legislative requirements for sheep and pigs into the Tuberculosis (Wales) Order 2011? Please explain your reasons.**



The majority of respondents agreed with the proposal and saw it as a better alignment of the legislation, more joined up approach and something that would encourage more engagement from cattle keepers. Some believed it was sensible to standardise legislation for all susceptible species, that it would simplify disease control without significantly increasing costs and that it would also aid gathering more data about TB prevalence in those species.

Many participants interpreted this proposal as TB testing and tagging of sheep and pigs, and expressed a view that testing large flocks of sheep would be impractical. A small proportion of respondents felt that other species should be included first, such as wildlife (badger, foxes and deer) and hounds before including sheep and pigs. Some believed it was an important and overlooked area, especially for sheep. A couple of respondents suggested that goats should also be included, but these are already included in the Tuberculosis (Wales) Order 2011.

Other comments included:

- The measure must be proportionate to the risk and based on scientific evidence and possibly field trials.
- A standalone piece of legislation following public consultation is required for non-bovines.
- Wildlife and Countryside Act should be consolidated with the Tuberculosis (Wales) Order 2011 to include badgers, foxes and other susceptible animals.
- More evidence of disease is needed in those species before including them in the TB Order.
- More research into diagnostic testing techniques for non-bovines is needed, and protocols for testing of those species should be developed.
- Current non-bovine legislation is unclear and further amendments would complicate it.
- Current powers are sufficient.
- We welcome this proposal by Government, as it provides an opportunity to enact clear and consistent protocols for legislative requirements in non-bovine farmed species.

**Q19 Do you agree with the approach of identification of non-bovines for TB testing purposes set out in section 9B? Please explain your reasons.**

Whilst an overwhelming majority agreed with this proposal, there was a misconception that this was about the general identification of non-bovines, not specifically for TB testing.

A proportion of respondents understood this measure as a specific one for camelids, and some mentioned general animal health and welfare reasons for identifying non-bovines. Some believed that this approach would ensure a more joined up approach likely to help with the engagement from cattle keepers.

Out of different means of identification, microchips were most popular amongst the

participants. Many believed it was essential for the entire TB testing policy that all TB tested animals were uniquely identifiable and a logical part of the TB testing procedure, to ensure traceability and correct identification of tested animals.. Many wished to see a national ID database for all species, and some questioned the need for separate ID databases in three administrations. A couple of respondents understood that identification was necessary in order to receive compensation for TB reactor animals.

Comments included:

- Locations and number of animals kept should be registered, but individual animals should not necessarily be identified.
- More appropriate for livestock being moved off.
- Testing non-bovines is not fit for purpose and there is no point in identifying these species until this is sorted.
- Non-bovines are increasingly kept as companion animals, so no need to identify them.
- Questions whether non-bovines are eligible for compensation and if not, then a reactor tag only should be applied and photographs taken.
- Any unidentified animals should be destroyed.
- Parity must be ensured between the legislation for camelids and bovines.

## **Governance**

### **Q20 Do you agree with the role and representation of the TB Eradication Programme Board? Please explain your reasons.**

The majority of respondents agreed with the role and representation of the TB Eradication Programme Board, however, there were mixed views in response to this question. Some believed that a refreshed TB Eradication Programme and Delivery Plan is a good time to revisit membership of the Programme Board, that good governance arrangements must apply to the appointments and that all appointees should be time limited in their length of service to ensure an automatic refresh. Most participants stated that the Board should be completely independent of the government, whilst some suggested a mixture of government and non-government representatives, with non-veterinary members also included. Many believed that the role of the board and its members should be clearly defined, and that the discipline of the academic representative should be clarified.

All who responded to this question felt that there should be an equal representation from various bodies. This representation should be broad, fair and transparent from a range of industries and backgrounds, to cover all aspects of TB and TB eradication, such as:

- The Centre of Excellence in Aberystwyth
- Animal welfare and ethics
- Sociologist
- Ecologist

- Conservationists
- Wellbeing of Future Generations Commissioner
- Farmers, particularly those with experience of TB breakdowns
- Vets
- Officials
- Academics
- Statisticians
- Epidemiologist
- Wildlife, environment and habitats experts
- BVA and BCVA
- Auctioneers/valuers
- Veterinary Delivery Partners
- Farming unions
- Communication and change management specialist
- Ministerial representative
- Politicians (Senedd)
- Someone with an interest in TB in wild animals such as deer, boar and goat
- Federation of Young Farmers Clubs
- Chairs of the Regional Eradication Boards
- Food processors
- APHA
- OCVO

Other comments included:

- If appointments are made by the Welsh Government there could be a perception that they lack transparency and independence.
- Scientists not involved in research or teaching of agriculture or allied sciences should be included, to scrutinise the scientific validity of any operational decisions.
- Expert statistician should be included to scrutinise data claimed to have statistical significance.
- These should be public appointments.
- There should be separate, local boards instead.
- Details and experience of board members should be made public.
- Current Programme Board lacks transparency; there has been no consultation with the industry on terms of reference.
- There should be appropriate payment for board members. To do otherwise may limit those who are able to take part.
- We fully support a partnership approach involving farmers, vets, government officers and other appropriate stakeholders (food processors, conservationists, scientists) as a strategy to develop constructive engagement and ensure that bovine TB eradication strategy is unified and appropriate to the local area.
- We are supportive of the role of the Board; and would encourage animal welfare considerations to be at the heart of its deliberations and central to its representation and future monitoring.

- Agree with the role of the TB eradication Programme Board, however, the refreshed programme and expected delivery plan is a good time to ensure representation is refreshed with the best individuals from across academia, industry and Welsh Government/APHA offered an opportunity to contribute to the work of the board.
- Good governance arrangements must apply to the appointments and all appointees must serve for a maximum time period to ensure automatic refresh.
- We wish to see greater involvement of the TB Centre of Excellence in the main board and overall policy development.

**Q21 Do you agree with any of the options outlined with regards to stakeholder involvement in the TB Eradication Programme set out in section 10B? If yes, please state which. If not, please provide the reasons why.**

The majority of participants agreed with at least one of these options:

1. Maintain the Regional Board geographical structure, but re-start the process of appointment to the Boards and setting of an appropriate clear Terms of Reference. Membership would be on a voluntary basis.
2. Create a single publicly appointed TB stakeholder group covering all Wales.
3. Create two publicly appointed TB stakeholder groups, one covering North Wales the other covering South Wales.
4. Discontinue the Regional Boards, and continue with the Programme Board only. Liaise with individual representative organisations for stakeholder involvement in the Programme.

Most respondents believed that the current regional board structure (Option 1) should be kept but the membership should be refreshed and a maximum tenure for members should be defined. It was the respondents' view that such a structure best matches the level of TB risk in different parts of Wales. This was followed by, in the order of support, Option 3, Option 2 and Option 4. Some believed that a single stakeholder group would not provide detailed enough information, whilst regional boards would produce a complex number of groups with some overlap. Many respondents emphasised that there should be clear terms of reference for the boards, proper engagement with WG and APHA and clear communication.

Other comments included:

- Boards are overrepresented by farmers and vets with little or no input from specialists in nature and biodiversity.
- Additional layers can complicate the accountability and communication process and potentially add to the costs.
- Some concerns over too much administrative burden if too many boards exist.
- Bovine TB is a regionally varied disease and as such we would encourage the Welsh Government to ensure any plans to reform the Board's geographical structure continues to recognise the benefits of splitting Wales into smaller regions to tackle this disease and the specific challenges arising in different parts of Wales

- We would urge the Welsh Government to ensure the prospect of future flexibility is built into any plans for a regional eradication structure.
- There may be some benefit to reducing the number of boards to two instead of three as part of the governance review. This fits with the two regional offices in Carmarthen and Caernarfon in South and North Wales respectively, and the two Veterinary Delivery Partners (VDP's).
- It is more important that whatever structure is agreed can set a clear direction for the eradication of this disease. The roles and responsibilities of the governance bodies should be reviewed to embed clear governance and good communication and stakeholder engagement.

**Q22 Do you believe there is an alternative approach? If so, please explain further.**

Slightly over half of those who responded to this question did not believe that there was an alternative approach. Of those who believed that there was, the following comments and suggestions were made:

- Establish a TB eradication company (similar to what is in place in New Zealand), half funded by farmers and half funded by the government. The company will be run by farmers, farmer representatives, private farm vets and APHA vets.
- The regional boards and the technical group to have a direct representation on the main programme board. This will enable joined up thinking.
- Fair, equal and transparent representation. Scientific information should be easily available, perhaps via leaflets distributed to farming community, access to libraries.
- Role of regional boards in knowledge transfer, boards acting as a link between WG and industry.
- One board with smaller sub-groups, and representatives from each smaller group on the main board.
- NZ system was proposed by two respondents, where industry take ownership of disease eradication, to ensure continuity regardless of political changes over time.

**Q23 Do you agree with the proposal of establishing a Technical Advisory Group? If so, please suggest scientific disciplines which could add value to the Programme? Please explain your reasons.**

An overwhelming majority of those who responded to this question supported this proposal and agreed that a Technical Advisory Group (TAG) would be of benefit to the Programme. Some believed that this would be a key group, which can only be effective if it is capable of feeding into government policy, and the group needs to be confident that technical advice is properly interpreted and applied, with clear guidance. Many felt that members of the group should have practical experience, no conflicts of interest, be independent of the government, and should target their work towards the current key objectives of the eradication programme. One respondent believed this should be the first thing set up before anything else is changed.

Some felt the TAG could be tied in with the TB Centre of Excellence and the membership should be such as to provide a practical and technical perspective on any advice. In general terms, participants felt that the group should be a mixture of technical experts, researchers, academics and those with practical experience of field delivery. Some believed that there should be different research teams feeding into TAG, with regular inputs from groups designing tests.

More specific suggestions with regards to TAG membership included:

- Immunologists who are experts in diagnostics, as well as immunologists with specialism in vaccines field;
- TB Centre of Excellence, Aberystwyth University;
- Epidemiologist;
- Environmentalist;
- Conservationist;
- Biologist;
- Social or behavioural scientist, including animal health economics;
- Sociologist, who would understand the plight of those dependent on the animal farming industry for their livelihoods;
- Specialist in animal husbandry;
- Communication specialist to improve engagement;
- VDPs;
- Wildlife specialist;
- Ecologist;
- Industry/farmers (representing different farming systems);
- BVA/BCVA;
- Meat hygiene representative;
- Vets from variety of backgrounds (not solely from government);
- Academics;
- Bacteriologist/microbiologist;
- Climate scientist and nutritionist who would contribute insights into the ways farming must change in order to reduce global warming;
- Engineer, to advise in directing farmers towards greener industries;
- Educationalist, able to construct effective messages for informing the public of changes needed for maintaining viable environmental conditions;
- Social and community psychologist;
- Humane society expert;
- Ordinary members of the public;
- Statistician;
- Animal and agricultural researchers;
- Doctor;
- Commercial companies;
- Unions;
- Levy board members;
- Representatives from other nations, especially NI and Scotland, WG and DEFRA to compare across the border;

- Guest representation from other countries where TB eradication policies were successful;
- University of Nottingham;
- A representative with an interest in TB in wild animals such as deer, boar and goat.

Other comments included:

- Chairman should be a member of Wales TB Eradication Programme Board.
- There is a need for a widespread public and farming industry attitude change to all aspects of animal welfare.
- Aberystwyth TB Centre for Excellence would be an excellent option to create an advisory base for advising Welsh Government and industry of new diagnostics and ways of tackling TB in Wales.
- The programme board should be able to seek expertise from various sources, not necessarily a group of individuals in the technical board.
- Establishing what research may be required and how to utilise findings would be sensible, with input from those with relevant training, expertise, and importantly – the experience.
- The Technical Advisory Group should report to the industry, the TB Eradication Programme Board and Regional TB Eradication Boards.
- Work of this group must be independent, open access and available to the industry. The proposal of the technical board reporting to the Programme board is rejected, on the grounds that the work of the Technical Group should be wholly transparent and independent of Government policies and ‘red lines’. The establishment of a group which could be called upon by the industry to provide technical information on a wide range of TB related issues would be welcomed.
- One concern that there may be too many advisory groups, with too much evidence and opinion put forward, that the situation is going to get even more confused, and that members may be selected who may not be objective.
- Epidemiological expertise will be essential.

### Other questions

**Q 24: We would like to know your views on the effects these proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.**

**What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

Many participants who responded to this question recognised that farming is an important part of rural Wales, Welsh culture and communities. A proportion of respondents believed that there was a decline in Welsh speaking in the farming industry. Some felt that the current situation makes it unattractive for young people to come to Wales, that the TB policy as well as the future climate change and environmental policies are effectively pushing young, Welsh speaking people out of

the countryside and forcing farming businesses to sell up (including to large companies offsetting carbon footprint), resulting in people moving from Wales.

The general view was that anything that negatively impacts rural Wales will have an impact on the Welsh language. For example, any worsening of TB conditions is bound to lead to more farmers giving up livestock farming resulting in a decline in the active use of the Welsh language, with subsequent negative effect on the younger generation learning and using it. One individual believed that the impact was on the Welsh culture rather than the language. Some believed that proposals outlined in the consultation document were a threat to the Welsh language. Some also felt that anything that improves the health and welfare of cattle will improve the health and welfare of the rural economy and the wellbeing of the current and future farming workforce. Some respondents, on the other hand, did not feel that there was any relevance of the proposals to the Welsh language, saw no impact, and commented that this was a TB consultation and efforts should concentrate on eradicating disease, not the language. Many believed that Welsh language should be treated equally with English and all correspondence should be bilingual. A few individuals believed that failure to tackle TB has led to an increase in mental health issues amongst farmers who are seeking help from mental health charities.

Other comments included:

- Vet practices should be able to offer at least one Welsh speaking vet in Welsh speaking communities.
- Consideration should be given to using social media platforms in both languages.
- A bilingual TB app would be useful.
- A Welsh speaker present at the time of a DRF could well be very helpful, as well as Welsh speaking case vets.
- Not all vets in rural areas of Wales are Welsh speakers. Lay testing should be actively promoted to boost TB-testing workforce, especially within a pool of technically trained veterinary assistants. Welsh-speaking technical assistants could help with DRFs.
- Any actions to improve the control and eradication of bovine TB will support rural communities in Wales through improved viability of cattle keeping. As rural communities have a higher percentage of Welsh speakers, the state of disease control and its impact on farms and the families living there will impact on the use of the Welsh language.
- TB can be devastating to the business and farming families, together with future regulation in terms water and air protection, and increasing input costs due to high commodity prices, resulting in Welsh speaking farmers leaving the industry and the area.

**Q 25: Please also explain how you believe the proposed policy approach could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no**



**adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

Views from individuals who responded to this question were similar to those in Q24, where respondents believed that the pressure and strain on the rural agricultural industry and community has a detrimental effect on the Welsh language. Again, some respondents saw no relevance of the proposed policy approach to the Welsh language, and a number mentioned an impact of the situation on mental health.

Comments included:

- Since there is a national shortage of vets, consider introducing Approved TB Testers similarly to what has been done in England. Welsh speaking para-professionals with cattle handling skills could support the use of Welsh language by having conversations with keepers and their rollout within private practice could greatly improve the current divide between the industry and Welsh Government.
- Encourage Welsh speakers to apply to vet schools. The new vet school at Aberystwyth University can play a lead role working in collaboration with farm practices and the two veterinary delivery partners to foster and promote the language.
- Encourage initiatives for vets not speaking Welsh to learn the language to a level at which they can communicate with clients in their first language.
- Welsh speaking members on the boards.
- Case vets should be able to speak Welsh.

**Q 26: We have asked a number of specific questions throughout this document. If you have any related issues which we have not specifically addressed, please specify.**

There were many comments submitted to this question, which represented a very broad range of views and topics, although some themes repeated from answers to the previous questions. Many of those who responded to this question expressed their gratitude for stopping the badger trap and test operations in persistent breakdowns, whilst a smaller proportion was of the view that wildlife needs addressing in the TB eradication context.

Respondents also offered the following comments (not an exhaustive list):

- Proposed policies will result in far more people giving up livestock farming and far less youngsters taking on their family farms or working on farms.
- Financial incentives or grants should be available to help implement biosecurity changes on farm.
- New approach that the Welsh Government has taken to address bovine TB in cattle is positive, much needed and long overdue by recognising that the main issue is one of unsustainable or incorrectly managed practices within the cattle farming industry.
- Cross border trade with England should be taken into account and proposals should be aligned with English TB requirements.

- Communication and alignment of policies need to be as consistent as possible across the devolved nations. Farmers and vets work across the borders of England and Wales and trade cattle all over the UK.
- All sources of disease should be addressed.
- More education for farmers needed about the epidemiology of TB and badgers.
- Management and restrictions on the movement of slurry. Engagement with proposals for managing the risk of disease from mismanagement of slurry would have been welcome.
- Testing requirements for Orange Markets, as current rules are too restrictive.
- Impact of eradication measures and TB in cattle on the health and wellbeing of farmers, particularly mental health.
- Badger vaccination – wildlife groups should contribute to cost.
- Badger surveillance (blood testing and data collection).
- Use of more sensitive tests and consideration of the role for supplementary tests such as Idexx and Enferplex.
- Social and mental health impacts of the current situation - policies/support mechanism should be in place to help those affected.
- Developing more engaging communication and training modules for farmers and vets (e.g. mobile apps).
- Improving data capture and sharing of data.
- IRs restricted for life policy should be introduced.
- Retest of IRs at severe interpretation, and if remain IRs, use IFN-gamma.
- Encourage development of new tests.
- Take badgers off the protected list.
- Removal of calves with TB reactor mothers should be considered.
- Renewal of the Action Plan for Wild Deer Management in Wales (2017-2022) should support research and monitoring of TB in wild deer.
- Tackling wildlife reservoir to engage farmers.
- End of tenancy considerations - a range of issues arising at the end of tenancy with individuals who are under TB restriction. It is not always routinely understood by landlords and their agents that providing vacant possession may not be possible due to the TB status of animals on land subject to a tenancy.
- There is no mention of the wildlife vector and yet this is an important part of controlling bovine TB. Wildlife may not be the primary cause of the majority of breakdowns, but it is in a significant number. Control of infected wildlife using vaccine alone is inefficient and expensive.
- Badger found dead survey is a random sample across a large geographical area that should not be relied on to shape policy within areas of high TB prevalence. A greater understand how much TB is within the badger population in Wales in high prevalence areas could be through the trapping and testing of badgers within their setts.
- The reasons for so many cattle movements need to be analysed and a way needs to be found to reduce the necessity for these.

- This consultation has not been framed within the context of the most important current issue in farming - the increasing realisation of the adverse effects of farming on climate and biodiversity.

### 3 Next Steps Statement

A Written Statement will be issued in July setting out the intended direction for our refreshed TB Eradication programme.

### Annex A

List of Individuals/ Organisations that Responded to the Consultation This list does not include those who requested anonymity or those who did not specify.

### Action Required

This document is for information only.

### Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

### Contact details

For further information:

### Contact details

For further information:

TB Team  
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### Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: <https://gov.wales/refreshed-tb-eradication-programme-2021>

## **Annex 1 – Named Respondents**

1. Brian Jones
2. Dai Evans
3. Beth Godley
4. Mary Barton
5. Johanna Macmahon
6. Nicky Loveday
7. Renee Byam
8. Shân Lloyd-Packer
9. Dr Gareth Huw Lewis
10. Roger Little
11. Carol Handcock
12. Winifred Margaret Cave
13. Beverley Foster
14. M Jones
15. Dr John Anthony O'Connor, PHD, BSc(Hons), MRCVS, CBiol, MRSB, MRCVS
16. Margaret Christian
17. Susan Flanders
18. Mike Rendle, Northern Ireland Badger Group
19. Jill Claye
20. Mr Simon Jones, Welsh Livestock Auctioneers Association / Morgan Evans & Co. Ltd.
21. Anne-Marie Hewitt
22. Vanessa Mason, Somerset Badger Group
23. Evan Roberts.
24. Dyfrig Griffiths
25. Rhys Morgan
26. Hannah Darnell, Scottish Badgers
27. Ian Newman
28. Jenny Pike, Devon Badger Group
29. Lyndon Edwards
30. Linda Griffiths
31. Clare Sandels
32. Jenny Layton Mills
33. Darren Parker, Essex Badger Protection Group
34. Val Stephenson
35. Steve Clark, Gwent Badger Group
36. Huw Evans
37. Patricia Scoffield
38. Anthony Scoffield
39. Megan Jones
40. Evan Roberts on behalf of the North Wales TB Regional Eradication Board
41. Martin Griffiths
42. Chris Mossman
43. Thomas Kearney
44. Tim Brigstocke, Royal Association of British Dairy Farmers
45. Jeff Laing
46. Tim Birch

47. Richard Lewis
48. Eilir Evans
49. Abi Reader
50. Erica Swan
51. Diane Shah
52. Clive C. Roads FLAA
53. David Thomas, Iechyd Da (Gwledig) Ltd
54. Barry Wise
55. Sarah Reisz, Dyfi Badger Group
56. Peter Hambly, Badger Trust
57. Elaine Masci, Glamorgan Badger Group
58. Glyn Challinor, South Yorkshire Badger Group
59. Gary Owen MRAC MRICS FAAV
60. Caryl Haf, Wales Young Farmers
61. Simon Wilson
62. Don Thomas, Welsh Lamb and Beef Producers Ltd