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Welsh Government
Consultation – summary of response

Bovine Viral Diarrhoea (BVD) Eradication Scheme for Wales

December 2022

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

Overview

This document provides a summary of the responses received by the Welsh Government to the consultation on - Bovine Viral Diarrhoea (BVD) Eradication Scheme for Wales.

Action Required

The consultation was public, but the target audience consisted of cattle keepers, people involved in the cattle industry, farming unions, industry representatives, auctioneers, veterinarians, and other members of the agricultural sector.

Further information and related documents

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

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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.

<https://www.gov.wales/compulsory-bovine-viral-diarrhoea-eradication-scheme-html>

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Part 1 – Introduction

1. Gwaredu BVD operates a voluntary BVD screening service for Welsh cattle keepers funded by the Welsh Government through Rural Payments Wales. They can also assist keepers in identifying persistently infected (PI) animals within a herd and provide guidance on achieving BVD freedom. Funding from Rural Payments Wales will no longer be available from 1 January 2023 bringing the voluntary BVD scheme to an end.
2. There are approximately 11,000 cattle herds in Wales. To date, around 9,163 of these herds have been screened for BVD (approximately 83.3%) and 2,539 (28%) of this figure tested positive for the virus. Within those herds, 940 PI animals have been identified.
3. Data gathered during the voluntary phase of the Gwaredu BVD scheme has shown it has not been possible to ensure the removal of PI animals from farms through a voluntary scheme. This is because there are no restrictions on the movement of PI animals or their herd. Management of PI animals in Wales has been inconsistent, with some keepers choosing to retain or sell these animals on.
4. The Welsh Government has committed to pursue a BVD eradication scheme for Wales

Proposals

5. The Welsh Government's proposal is to replace the voluntary BVD scheme with a compulsory scheme, underpinned by legislation. This legislation will require all cattle keepers to have their herds annually screened for the virus, beginning with a BVD screening within 12 months of their previous voluntary screening, to be completed by an approved veterinary surgeon.
6. Positive herd status will be assigned when any animal tested as part of the screening process returns a positive result for BVD antibodies.
7. Herds that test positive for BVD antibodies will have their movement restricted and all animals in the herd will be required to be individually tested, including those born in the 12 months after the positive screening test. Animals that return a positive BVD antigen test will require an additional test after 21 days have passed, to determine whether the animal has developed immunity.
8. Individual cattle from an antibody positive herd that test positive will only be allowed to move to slaughter unless they have returned a subsequent negative BVD antigen test and 21 days have passed. This will not be possible for a PI animal, given its inability to achieve immunity.

Consultation Responses

9. As well as being published on the Welsh Government website, the consultation was advertised by Gwaredu BVD at the 2022 Royal Welsh Agricultural Show.
10. A total of 106 written responses were received. These responses came from a variety of professions and positions relevant to cattle keeping. The majority of these responses were received from Wales, with a small number sent from elsewhere in the UK.
11. Respondents were able to submit their views and comments on paper or online, in either Welsh or English.
12. The Welsh Government and the Office of the Chief Veterinary Officer for Wales is grateful to everyone who responded to the consultation proposals. The responses represent an invaluable source of views, information and ideas which will inform the development of legislative proposals for BVD eradication. While not all suggestions for change or amendments will be adopted, all points raised have been duly considered.
13. A summary of the responses to each question is provided below. A list of respondents to the consultation is provided at Annex A.
14. The majority of respondents answered each question. Some also provided additional comments, which have been analysed and noted.
15. All respondents were asked to provide their anonymity preferences. Of the 106 completed responses, 53 asked for theirs to remain anonymous.

Part 2 – Summary of Key Themes

The following key themes emerged from the consultation responses.

Are you involved with cattle keeping?

16. 80% of respondents confirmed they were directly involved with cattle keeping. Over 45% of these were beef cattle keepers, while 12% were dairy cattle keepers. 6% identified themselves as representing farming unions and 48% were veterinarians or involved with veterinary practices in some capacity.

Principles of BVD eradication

17. 98% of respondents agreed BVD is a problem for Welsh farming and 99% of respondents agreed BVD eradication will improve the health of Welsh cattle.
18. 97% of respondents agreed that BVD eradication would benefit Welsh cattle keepers and 89% of respondents agreed with the introduction of legislation to support BVD eradication in Wales.
19. This represents a very strong level of support for tackling the issue of BVD in Wales.

BVD screening

20. 81% of respondents agreed that legislation requiring mandatory BVD screening was necessary to achieve BVD freedom and 70% felt that cattle from BVD non-negative herds should have their movements restricted.
21. There was a mixed response regarding whether pre-movement tests should be required for cattle moving off restricted farms with 48% expressing agreement with this proposal.
22. 56% of respondents agreed keepers should be required to pay for testing under the proposed scheme.

PI Management and Isolation

23. 84% of respondents agreed that PI isolation was necessary to maintain an effective BVD eradication scheme.

BVD Data Management and Enforcement

24. 88% of respondents agreed with the proposal to have BVD status of herds displayed securely to other keepers, while 81% supported the proposal to introduce penalties for non-compliance in relation to the proposed eradication scheme.

Effects on the Welsh language

25. The majority of respondents offered no comment on this question, although some highlighted the need for a bilingual service to keepers. One response stated the need to ensure Welsh language services were made available in an industry containing a large number of Welsh speakers should be an important consideration.

Part 3 – Summary of responses by question

Bovine Viral Diarrhoea (BVD) eradication

26. The consultation asked questions on the principle of BVD eradication and whether BVD should be considered an important issue for the cattle keeping industry in Wales. It also asked about the proposal to introduce legislation for BVD eradication

Question 1 - Do you agree that BVD presents a problem for the farming industry in Wales?

27. All but 2 respondents agreed BVD was a problem for Welsh farming and a variety of reasons were given for these responses.

28. A number of responses highlighted the impact BVD has on animal health and welfare, noting the immune-suppressive nature of the disease and its ability to cause abortions and increased herd mortality.

29. The economic impacts on keepers were also cited as a significant concern, with reduced productivity and animal value among herds, leading to increased financial pressure on keepers and a less efficient industry.

30. Irresponsible handling of PI (persistently infected) animals and TI (transiently infected) animals was raised as an issue, which continues to move the disease across Welsh farms and results in a wider impact.

31. Some noted that without proper controls to prevent BVD spread, the disease will remain prominent in the Welsh industry.

32. Those who disagreed with the statement, claimed BVD represents an issue for individual farmers, but not the industry as a whole.

Question 2 - Do you agree that BVD eradication will improve the health and welfare of Welsh cattle?

33. All but 1 respondent agreed the eradication of BVD will improve cattle health and welfare.

34. The removal of the immune-suppressive qualities of a disease like BVD was raised as a significant benefit to cattle welfare, which can be greatly diminished by infection with Mucosal Disease, as well as other subsequent infections (e.g., pneumonia). These infections are far more likely to occur within a herd where BVD is prevalent.

35. Others commented that BVD eradication would result in healthier calves being born, a reduced need to cull or remove animals from the herd and improved overall health of the herd.
36. A reduction in fertility issues and the decreased need for antibiotics and other medicines were also viewed as long-term benefits to animal health which would result from BVD eradication.
37. Productivity, milk yield and appetite were cited as aspects of cattle health and welfare that would benefit from eradicating BVD.

Question 3 - Do you agree that eradication of Bovine Viral Diarrhoea (BVD) will benefit Welsh cattle keepers?

38. All but 3 respondents agreed with the above statement, with the reasons provided linked to views on increased animal health and welfare as a result of BVD eradication.
39. The ability to maintain a healthy herd was noted as providing financial benefit, with fewer medicines needed and animal productivity increased. Reduced mortality was also a positive factor here.
40. The confidence to buy-in cattle without risking the introduction of BVD to the herd was recognised as a wider benefit to cattle keepers and consistent with financial returns.
41. The reassurance provided by BVD freedom was considered to be important in supporting the mental health and wellbeing of keepers. The psychological impact of losing animals to disease was a prominent driver for support of this statement.
42. Improved trade prospects were raised by a number of respondents as a benefit for keepers who achieve BVD freedom.
43. One concern raised by a respondent who disagreed with the statement was that keepers of small herds, who do not move cattle onto their farm could face an unnecessary financial burden, due to a lower likelihood of BVD being introduced to their herd.

Question 4 - Do you agree with the introduction of legislation to support the eradication of BVD from Wales?

44. 89% of respondents (89), agreed with this statement, whilst 11% (11) respondents, did not agree.

45. The need to ensure responsible management of infected animals and to prevent infected animals being sold on were important factors in the supportive responses.
46. Respondents felt that while the success of the voluntary scheme and the level of engagement from the industry were positive developments, legislation would be required to eradicate the disease. Many did not believe it would be possible to eradicate the disease using a voluntary scheme.
47. The success and progress of other countries including Scotland and Ireland, which have introduced compulsory eradication schemes was cited by many as examples to follow.
48. The culture of maintaining persistently infected animals without choosing to voluntarily remove or cull them, was viewed by many respondents as a situation that can only be resolved by legislation.
49. It is important to note that whilst the majority of respondents agreed legislation was necessary to eradicate BVD, not all respondents were in agreement that legislation in the form proposed by the consultation was the best way to achieve this.
50. The details of these differing views on BVD legislation are summarised in the sections that follow.

BVD Screening

Question 5 - Do you agree that legislation imposing requirements for mandatory regular BVD screening is necessary to eradicate the disease?

51. 81% of respondents (82) agreed with this statement, but 18% of respondents (19) did not agree.
52. Those in agreement commented that regular screening was necessary in order to identify PIs and remove BVD from farms, which can be reintroduced via cattle movements.
53. The need to increase the level of participation beyond the voluntary levels and introduce an effective system was a recurring theme in responses.
54. It was consistently noted that BVD eradication can be achieved much more quickly and efficiently via mandatory screening requirements and that it cannot be achieved through a voluntary process.
55. Those who did not agree believed the approach was not the most efficient way to achieve eradication. One respondent suggested a system mirroring the Scottish programme, which permits tag-and-testing of all newborn calves would provide a more consistent approach across the UK.

56. Some questioned why annual screening was necessary for keepers that have already successfully eliminated BVD from their herds.
57. Concern was raised regarding keepers who regularly buy cattle from England, where BVD legislation will not be in place once the Welsh scheme comes into force. This was seen as a route for BVD to be consistently reintroduced into Welsh farms.
58. Concern was also raised about the impact vaccinated animals will have on the proposed screening system and that keepers who vaccinate their animals against BVD may be discouraged or disadvantaged by doing so.
59. Others referenced the success of the voluntary scheme as a reason why mandatory screening was not necessary and that those who do not import any cattle need not be included in mandatory screening.
60. Increased bureaucracy and cost to farmers were given as reasons why some did not support the introduction of mandatory screening.

Question 6 - Do you agree that cattle from a herd with positive BVD status, that test positive, should have their movement restricted, unless that movement is to slaughter?

61. Agreement with this statement reached 70% (70) of those who responded, but it was noted that 30% of respondents (30), did not agree.
62. There was some confusion about whether the BVD herd status will be defined via antibody testing or antigen testing. This is explained in the body of the main consultation document.
63. The need to prevent disease spreading from farms where BVD is suspected was the main rationale for agreement with this statement, as this would otherwise allow BVD infected animals to move unchecked.
64. The risk posed by BVD infected animals to the rest of the herd, and potentially other herds was also cited as a reason for agreement. Restrictions were viewed by many as essential to maintain good biosecurity.
65. The reluctance of some farmers to responsibly manage PI animals was cited as a reason why restrictions would be necessary.
66. One comment suggested the introduction of restrictions for a disease such as BVD was disproportionate and would result in increased restrictions for keepers.
67. Calf rearers and finishers were considered by some respondents to be disadvantaged by these restrictions if they buy-in antibody positive animals.

68. Concern was raised about the risk of BVD spread posed by animals travelling to slaughter.
69. The impact on farms in the short term, whilst also potentially dealing with TB was seen by one respondent as putting a considerable amount of strain on keepers and their ability to trade. The wellbeing of farmers whose herds are restricted was consistently raised in the responses that did not agree.
70. One comment suggested that neighbouring farms be informed of the presence of BVD on an affected farm, to better inform them of the disease risks in their area and help them tailor biosecurity efforts.
71. The severity of restrictions was questioned by 3 respondents. An alternative suggestion was to limit the level of restriction to pregnant cattle and PIs only, and that herds should not be restricted based on the result of an antibody test.
72. Support for the “tag and test” method of BVD testing, as a favourable alternative, was provided in comments from 10 respondents who did not agree with the statement in this question.
73. It was questioned why such significant restrictions should be placed upon herds when based on antibody testing of only a small number of animals.

Question 7 - Do you agree that cattle from a herd with positive BVD status, that test negative for BVD via antigen test, should not be permitted to leave the holding where they are based unless they obtain a pre-movement negative antigen test within 21 days of the move?

74. Whilst responses to this question were close to equal, a small majority of 51% (50) said they did not agree with the above statement.
75. Allowing an animal that is proven not to be a PI at the PI Hunt stage to have a lifetime pass to move freely without additional testing was suggested by 6 respondents.
76. Respondents raised questions about the ability to ensure an animal leaving the premises has not become infected with BVD, following its pre-movement test, unless it was quarantined before being moved.
77. An alternative suggestion was that the pre-movement window should be 60 days instead of 21, to bring rules in line with those of TB.
78. An alternative suggestion was that pre-movement isolation would provide a more effective way of ensuring TI animals are not moved off farm.

79. Those that agreed with the statement cited the risk posed by BVD positive animals to other herds. These responses indicated support for pre-movement testing as a safeguard against onward transmission.
80. A question was asked about the movement of pregnant cows, which may test antigen negative but could be Trojan cows. This matter has been addressed in the Government consultation response.
81. Some believed calf rearing and finishing businesses to be disadvantaged by this rule, as it could delay movements.
82. One respondent asked whether or not the PI hunt results could be used as a pre-movement test. It was also questioned whether the additional vet visit and cost for testing would be accepted by keepers.
83. Post-movement testing for potential TIs was put forward as an alternative, based on the rationale that an animal could become infected with BVD between its pre-movement test and the movement date.
84. The increased demand on vets to conduct tests was a notable concern in some responses.
85. Some respondents questioned whether the spread of infection from TI animals was significant enough to warrant pre-movement testing and stated the control of PIs was the important factor in BVD eradication.
86. More evidence to justify this provision was requested by a number of respondents. This is provided in the Government consultation response.

Question 8 - Cattle keepers may be required to pay for their herd screenings, PI Hunts and pre-movement testing to move cattle from a BVD positive herd. Do you agree that, in principle this is a fair expectation?

87. Approximately 56% of respondents (55) supported this proposal while 43% (43) did not.
88. Many who agreed commented that the long-term benefits and savings of BVD eradication would outweigh the short-term costs to keepers for testing.
89. The level of support from Gwardu BVD during the voluntary phase of the scheme was considered by most respondents to be sufficient to allow keepers to control BVD on their farms, ahead of testing costs being introduced.
90. Some who agreed in principle with the cost for testing being placed on keepers, argued that the level of testing required (pre-movement testing) increased the financial burden on keepers and could be simplified.

91. It was suggested keepers should work with vets to ensure their testing costs are kept as low as possible.
92. Concern that keepers who vaccinate for BVD would be penalised, due to the likely need to conduct PI Hunts, was prominent in responses.
93. Those who disagreed in principle, argued the Welsh Government should either pay for the testing in full or subsidise testing to eradicate BVD. The financial pressures on keepers due to wider factors were referenced in this rationale.
94. The need to better publicise the financial benefits of eradicating BVD was requested.
95. Some compared the scheme to the TB rules and argued that if keepers are not required to pay for TB testing, they should not be asked to pay for BVD testing.
96. A suggestion was put forward that only those keepers who have not engaged with the voluntary phase should be asked to pay for their tests.
97. The possibility of a keeper being penalised by having to conduct a PI Hunt after moving on vaccinated/antibody positive animals appeared in a number of responses.
98. Increased costs and the impact on the mental health of keepers was a recurring theme.
99. Two respondents commented that if keepers are being asked to pay for testing, then additional support and guidance should be offered to increase biosecurity levels on farm and minimise the possibility of BVD being reintroduced.
100. Many respondents argued compliance could be encouraged by offering a subsidy or other financial reward for successful and prompt management of PIs.
101. An alternative, whereby mandatory BVD screening was paid for by the Welsh Government, but PI Hunt costs were covered by the keeper was suggested.

PI Management and Isolation

Question 9 - Do you agree that legislation imposing requirements for mandatory PI isolation is necessary to eradicate the disease?

102. 84% of respondents (85) agreed with this statement, while 15% (16) stated they did not agree.
103. Some respondents suggested compensation should be offered for slaughter or isolation of PIs.

104. Many who did not agree believed mandatory slaughter of a PI would be a more effective method of controlling BVD. They argued that the risk of disease being spread, or a keeper's unwillingness or inability to maintain the isolation will undermine the scheme.
105. Those who agreed commented that the large amount of virus shed by a PI is the factor which determines the need for indefinite isolation.
106. One respondent noted that keepers will be more likely to cull PI animals if they are denied from entering the food chain, thus lowering the risk of transmission of BVD via contact or fomites.
107. The ability to ensure the welfare of isolated PI animals was raised as a significant concern.
108. One respondent commented that the presence of a PI animals on a finishing unit should not require isolation and had no bearing on the spread of the disease. It was suggested only PIs that come into contact with breeding animals should be isolated.
109. An alternative to giving keepers a deadline to have their PI animals sent to slaughter was suggested, with restrictions maintained on the farm if this was not done.
110. Some concern was noted with regard to the use of companion animals, and how this could increase the risk of BVD transmission to the herd.
111. Robust enforcement and the need to push beyond retaining PIs on farm was a notable theme in some responses.

BVD Data Management

Question 10 - Do you agree that farms should have the BVD status of their herds and individual animals (where their herd status is BVD positive) made securely available to other keepers via the Multi Species Wales online portal at the time of purchasing cattle?

112. This question yielded an 88% agreement rating from 89 respondents, whilst 11% of respondents (12) did not agree.
113. Some who did not agree were concerned this practice could result in stigma for those farms that had tested positive for BVD at the screening or PI Hunt stage.
114. Those in support largely favoured relying on the ability of farmers buying in cattle to make informed decisions and see the status of the animals being moved, notably when buying breeding animals.

115. Some stated markets should take responsibility for announcing BVD status ahead of advertised Sales.
116. Some respondents asked that clarity be offered to help keepers interpret the BVD information displayed, particularly to ensure the difference between antibody and antigen positive statuses is understood.
117. Some questioned if this information would be made visible on a UK wide basis.
118. Others were in support of displaying this information based on antigen result status, but not antibody status.

Enforcement

Question 11 - Do you agree keepers that breach the requirements of the proposed compulsory scheme should be liable to penalties?

119. 81% (84) of respondents agreed with this statement, whilst 18% (18) stated they did not.
120. Two respondents suggested movement restrictions were a sufficient penalty in themselves, without the need for further action.
121. Two respondents questioned how the process would be monitored and enforced.
122. Those who agreed considered the need for proportionate penalties to ensure compliance.
123. Five respondents raised the need for an appeals process, including a process for rectifying issues prior to a prosecution stage.

Additional Comments

124. The point about complexity was reiterated by 5 respondents, and 13 respondents commented that they agreed with the principle of eradication, but not the method via annual screening as currently proposed.
125. The cost to keepers and the lack of compensation for restricted herds and culled PI animals was raised as a concern by 8 respondents, with some noting the financial and administrative pressure this could add to keepers.
126. The potential for different future BVD rules in England and the impact on managing cross-border BVD risks was raised by 7 respondents.

127. Respondents asked the Welsh Government to ensure the most effective system for BVD eradication was established and the progress achieved from the expenditure to date built upon.

Part 4: Next steps statement

The Welsh Government will publish its official response to the consultation summary, addressing the key themes and providing additional information on requirements and rationale where necessary.

The summary of responses will be used to inform the development of the proposed BVD legislation. A further public consultation may be issued on the final proposed legislation to gather views on any new or amended requirements of the proposal.