



Llywodraeth Cymru
Welsh Government

Welsh Government Response to the Summary of Responses following the Bovine Viral Diarrhoea (BVD) Eradication Scheme Consultation

December 2022

1.0 Introduction

The Welsh Government and Office of the Chief Veterinary Officer for Wales would like to thank everyone for providing their views and responding to the questions included in the BVD Eradication Scheme Consultation. Our responses to key concerns raised are summarised below.

2.0 Bovine Viral Diarrhoea (BVD) eradication

It is clear from the summary of consultation responses that most respondents agree BVD presents a significant issue for Welsh cattle farming, including animal welfare and productivity, the wellbeing and finances of cattle keepers and the cattle trade.

The majority of respondents also agreed the eradication of BVD in Wales would have a positive impact on the health of the national herd, as well as the sustainability and finances of keepers. To achieve this, most respondents supported the introduction of legislation in some form to introduce compulsory requirements for achieving BVD freedom.

There was, however, a variety of views on how this should be achieved. Not every respondent who supported legislation directly supported it in the form proposed by the Welsh Government.

2.1 Tag & Test / Annual screening

The majority of respondents supported the proposal that cattle that test positive via antibody testing should have their movement restricted, unless that movement is to slaughter. 10 out of 74 Respondents who provided comments to this question indicated a preference towards the use of the “Tag & Test” system, as seen in Northern Ireland’s BVD scheme, whereby new-born calves, including stillbirths are tested for BVD, and follow-up testing and restrictions are completed as necessary. Of these, some respondents described the Tag & Test system as a fairer, more cost-effective method for keepers, which would not require paying for annual testing.

The Welsh Government understands the importance of making the BVD requirements as cost-effective for keepers as possible. While it is true the risks of BVD spread are lower to a closed herd or a herd that does not buy in animals on a regular basis, the risk of transmission via fomites (clothing, vehicles, etc.) or “over the fence” contact between animals remains. As a result, all cattle keepers will benefit from being able to demonstrate BVD freedom in their herds.

There are benefits and disadvantages to both the annual screening and Tag & Test approach to BVD control. The annual screening method provides a clear picture of

the national herd's BVD status, by assigning an individual status to every herd. This will give further assurance that once a herd is BVD negative, the likelihood of virus circulating in the herd will be low.

The cost for both methods will depend on the type of herds and the size of the business being managed.

The average yearly testing cost of antibody testing herds is estimated at between £50 and £150 per year, depending on when the testing is carried out and on veterinary practice fees. If carried out during a routine TB visit, the fee for annual screening is estimated at £50 and if done as a separate visit/test it is estimated at up to £150 (including an estimated £30 call out fee).

Additional testing costs following annual screening will only be required if positive BVD antibody animals are identified in the screening group. By comparison the Tag & Test method requires all calves born on a premises to be tested.

When considering the Tag & Test method for BVD testing, the welfare implications for doing so must be taken into account. Animals cannot be ear-tagged more than twice in their lifetime as repeated tagging presents a risk of ear damage and suffering. The potential for compulsory ear-tagging to cause unnecessary welfare issues for cattle would be a significant consideration when implementing a Tag & Test system.

We will continue to engage with other disease eradication programmes operating in the UK and the lessons learnt from the schemes in Scotland and Northern Ireland, as well as the latest scientific evidence, to inform the testing approach for the BVD eradication scheme for Wales.

2.2 Voluntary scheme

It is noted that a number of respondents believed the success of the voluntary scheme in gaining participation of cattle keepers with Gwaredu BVD was sufficient to negate the need for a compulsory scheme. While the voluntary scheme has driven down the prevalence of BVD in Wales, it cannot as it stands bring about BVD eradication, which is the goal of Welsh Government.

2.3 Buying from England

We note there was some concern amongst respondents about the potential differences between the BVD rules for Wales and other UK countries, notably England. BVD alignment meetings will be held between administrations to ensure there are no significant barriers to future schemes working in harmony. It will, however, be the responsibility of the individual cattle keeper to source their

animals and seek assurances for the health of the cattle being bought from England, where a BVD scheme is not currently in place.

2.4 Bureaucracy/Red tape

We understand the concerns surrounding the scheme requirements and the need to limit the administrative burden for cattle keepers. The introduction of a compulsory testing scheme will inevitably increase the level of administrative work required by individual keepers. However, by working closely with vets and with guidance available for operating within the scheme requirements, the BVD screening process should become a routine action with limited business disruption. The scheme is intended to work for the benefit of all concerned and its success will require engagement by the cattle-keeping community, their vets and industry representatives.

3.0 Movement restrictions

The requirement for herds which test positive for BVD antibodies to be placed under movement restriction was a concern in many responses. The potential impacts on keeper finances and wellbeing were raised, particularly in parallel to managing other diseases, such as Tuberculosis (TB). We recognise the impact movement restrictions can have on a business and business owners. In the event movement restrictions are imposed, we strongly urge keepers to work with their vets to complete the necessary testing requirement (i.e., a PI Hunt), to identify and responsibly manage the Persistently Infected (PI) animal and become free from restrictions as soon as possible.

The voluntary Gwaredu BVD scheme continues to offer the opportunity to conduct antibody screening and PI Hunts, free of charge until 31 December 2022. By engaging with the voluntary scheme, keepers will reduce the risk of BVD in their herds and the possibility of being subject to movement restrictions in the future. A transition phase is planned ahead of full implementation of the compulsory scheme to allow keepers to become accustomed to the new requirements, without restrictions in place. Guidance will be available to help keepers operate within the scheme requirements and further advice should be sought from private vets as required.

The aim of the scheme is to reduce the impact of BVD on herds and keepers across Wales, increase productivity and improve financial gains. We believe the overall impact on the productivity of cattle and the wellbeing of keepers in the medium and long term will be positive. The impact in the short term can be minimised through active engagement with scheme requirements and swift PI management.

Movement restrictions are a vital aspect of the BVD eradication effort, and to minimise the risk of disease spreading across Welsh farms, it will be necessary to

prevent cattle from leaving the premises without a pre-movement test, until the necessary steps have been taken to manage identified PIs. The movement of transiently infected (TI) animals presents a risk of disease spread and the potential to create more PIs¹²³. This must be factored into any requirements for restrictions.

4.0 Pre-movement testing

A small majority of 52% of respondents did not agree with the proposal that cattle from a BVD positive or non-negative herd should only be moved off the premises with a pre-movement antigen test conducted 21 days prior to the movement.

Officials view this requirement as a key measure for preventing BVD moving off farm. This will ensure the animal being moved off farm is, firstly, not a PI and secondly, that it is not a TI. Either would present a risk of spreading the disease to the movement destination. Without pre-movement testing in place, there can be no assurance that BVD positive animals are not being moved across Wales.

We note the concern that an animal which tests negative for BVD 21 days before the movement can still become infected before the movement takes place, but this should not happen if responsible, swift and biosecure management of a PI has taken place and the risk of BVD on farm is removed. The scheme requirements are designed to protect all farms when receiving animals but requires good keeper engagement to function without risk of further restrictions and/or penalties. Further consideration will be given to the specified timeframe for pre-movement testing.

The antigen result at the PI Hunt stage cannot serve as a pre-movement test, as this result will potentially be issued before steps have been taken to isolate any identified PIs on farm and will likely result in an inconsistent number of days passing between the test result and the movement. We do not believe this is a fair and responsible method for managing PIs.

We believe that testing of animals before moving them, presents a consistent or reliable way to ensure infected animals are not moved. It is our view that the alternative of isolating the animal without further testing prior to a move would present a greater risk to disease transmission and further bureaucracy and complexity for keepers.

4.1 Lifelong antigen status

Some respondents asked if would be acceptable to allow lifelong BVD-free status to animals that are confirmed not to be PIs via antigen testing.

¹[World Organisation of Animal Health Chapter 3.4.7 Bovine Viral Diarrhoea](#)

² Houe, H., Lindberg, A. and Moennig, V. (2006). Test Strategies in Bovine Viral Diarrhea Virus Control and Eradication Campaigns in Europe. *Journal of Veterinary Diagnostic Investigation*, 18(5), pp.427–436. doi:10.1177/104063870601800501

³Tratalos, J.A., Graham, D.A. and More, S.J. (2017). Patterns of calving and young stock movement in Ireland and their implications for BVD serosurveillance. *Preventive Veterinary Medicine*, [online] 142, pp.30–38. doi:10.1016/j.prevetmed.2017.04.005.

We do not agree with this proposal, as those animals can acquire transient infection and still present a risk of BVD transmission, especially if used for breeding purposes. Considering PI animals are born from pregnant TI animals, it would be irresponsible to disregard the risk posed by a potential TI animal, that has not been antigen tested and may then be used for breeding purposes.

Management of existing PIs is vital to eradicating BVD but preventing the creation of more PIs is just as important. Comprehensive antigen testing on farm at the PI hunt stage is the most effective way to reduce BVD risks for Welsh herds.

We do not agree that post-movement testing is a more effective approach for minimising risk of BVD spread, as it will result in testing taking place once the risk has already been potentially introduced to the destination premises. It will also disadvantage keepers buying animals in, who are not able to know the BVD status of the animal before it reaches their farm.

4.2 Trojan cows

We welcome the comments on the movement of pregnant cows, that may test negative via antigen test, but could be harbouring a PI animal. The concern in responses noted how these animals may be considered fit to move but present a significant BVD risk to their destination premises.

In response to this, we have added a requirement to our scheme proposal, whereby pregnant cows purchased from a premises without a BVD negative status will require isolation until the calf is born. To reduce on-farm risk, we will require all calves born in the 12 months following the last identified PI in a PI hunt to be antigen tested within 20 days of birth.

5.0 Paying for tests

We note a majority supported the proposal that keepers should fund testing costs under the compulsory scheme. We acknowledge the consultation document would have benefited from including a cost/benefit analysis for this proposal.

The voluntary Gwaredu BVD scheme has provided keepers the opportunity to conduct BVD screening and PI, free of charge. Pro-active engagement with the voluntary scheme and PI management will reduce the financial impact on keepers once the scheme requirements become compulsory.

The long-term benefits of increased productivity, healthier animals, and improved trade prospects in Wales and across the world are expected to far outweigh the cost to screen and test animals to prove they are free from the BVD. Testing animals proactively for BVD should be viewed as an investment in animal health.

Good engagement and compliance with the requirements by Welsh keepers will reduce the overall costs for all, by expediting the eradication of BVD in Wales.

BVD management should become a standard business practice for Welsh farms and the costs of ensuring BVD freedom should be factored in when monitoring the health of a cattle herd and producing a biosecurity plan.

5.1 Vaccination

The concerns raised in the consultation responses, relating to vaccinated animals being included in annual BVD screening groups and likely resulting in the herd receiving a non-negative status have been taken into account.

The guidance and legislation for the compulsory BVD scheme will strongly advise keepers to ensure they do not include animals vaccinated for BVD in their annual screening groups.

The health and vaccination status of an animal should be known by the keeper and kept on record to avoid inappropriate restrictions on the herd. It will be the responsibility of the keeper to request the vaccination status of any cattle being brought on to the farm and to maintain their records appropriately.

We do not recommend that keepers be discouraged from vaccinating their animals for BVD as this does present an effective measure to prevent the spread of disease. It must, however, be factored into the management of BVD under the proposed compulsory testing scheme. Improperly kept vaccination records may result in unnecessary restrictions and will impact cattle trade across Wales.

6.0 PI Isolation

We are pleased that most respondents agreed with the proposal that PI animals should be isolated indefinitely from the herd. We also note that many believe compulsory slaughter would be a more effective method of PI management. The Welsh Government position is that management of BVD should be as much of an individual business decision as possible. The scheme requirements are designed to minimise the onward spread of the BVD virus.

So long as PI animals are isolated and do not present a risk of onward spread of disease, we consider it is not appropriate to mandate keepers to cull or slaughter these animals. BVD does not present a risk to human health and PI animals may be sent to slaughter, to enter the food chain. It is for the individual cattle keeper to weigh the risks and benefits of keeping a PI on farm and managing its health and welfare. We do not plan to introduce a compulsory PI slaughter requirement for these reasons.

7.0 BVD data management

A large majority of respondents agreed that the positive BVD status of herds should be made securely available to potential buyers. We note, however, that stigma may arise, as keepers may unknowingly bring BVD onto their farm via a movement or an “over the fence” transmission. This kind of stigma can affect reputation, wellbeing, and trade prospects for keepers.

We want to emphasise that the BVD scheme intends to provide a route for keepers to eradicate BVD from their herds, protect them from introducing the disease to their animals and play a part in a cooperative effort to achieve BVD freedom, whereby all keepers can benefit. We believe strongly that keepers need to know the BVD status of animals and herds before buying them, and that this should be done with the scheme’s goals in mind.

A keeper whose herd has a BVD positive status should be viewed as a business owner engaging honestly and prudently with the scheme with the aim of managing their PIs and achieving BVD-free status. Industry must play an active role in nurturing a culture of support and cooperation in the effort to eradicate BVD in Wales.

We would like to highlight that only necessary information to make an informed purchase will be made available to buyers, via a secure online platform.

8.0 Enforcement

Most respondents agreed with the proposal to introduce penalties for non-compliance with the scheme. Many responses, however, ask that these be proportionate and well evidenced.

The Welsh Government position is that the effort to eradicate BVD requires the industry to engage transparently and proactively with the scheme requirements for the benefit of all. Non-compliance does not only affect the offending keeper’s business, it can also impact other herds. Non-compliance must, therefore, be taken seriously and the introduction of penalties may be necessary to ensure compliance is maintained and the scheme’s integrity is not compromised.

Our first priority, however, will be to help keepers remain compliant with the scheme requirements and receive guidance where there is uncertainty on actions required.

9.0 Conclusion

We appreciate all responses received to the consultation and, in this summary, confirm our position in relation to key issues and concerns raised. Respondents to the consultation were representative of many backgrounds and stakeholder interests, and our analysis concludes the majority were supportive of the proposed

legislation as a means to eradicate BVD in Wales. As a result, the scheme as set out in the consultation document will continue to form the basis of Welsh Government legislation in this important area of animal disease policy.