



Llywodraeth Cymru
Welsh Government

Wales TB Eradication Programme Delivery Plan

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Foreword by the Cabinet Secretary



A handwritten signature in black ink that reads 'Lesley Griffiths'.

Lesley Griffiths

Cabinet Secretary for Environment
and Rural Affairs

In my foreword to our consultation on the Wales TB Eradication Programme, launched in October 2016, I expressed my determination to do everything I could to eradicate this disease which has such a significant financial and social impact on farming businesses and the wider rural community. We must recognise that although we see a clear downward trend in new TB incidents, there is still more we need to do to speed up this rate of progress. We will do this by identifying and addressing local disease drivers as part of the new regionalised approach, and by bearing down on the most stubborn, long term and recurrent breakdowns through bespoke, farm level actions.

I am committed to basing our approach to TB eradication in Wales on the latest evidence, and the majority of the enhancements included in this Wales TB Eradication Programme Delivery Plan are supported by existing evidence. This evidence based methodology is balanced by the need to try new approaches where there may be little evidence currently available. Where this is the case, the Welsh Government has been led by the latest expert veterinary opinion, and has committed itself to gathering and monitoring new evidence as it emerges. The impacts of the measures will also be reviewed regularly and appropriate adjustments then made.

Having identified the role for Government in the fight against bovine TB, I also call on the farming industry and veterinary profession to play a full part. This document should not be seen as exclusively a Government plan; it has been developed through consultation with industry, and will be reviewed over time, again in consultation with industry. I have listened to the considered views of stakeholders and partners, and taken this advice on board in a number of areas, amending measures as they were set out in the consultation, to achieve a more effective and fairer way forward.

It is my sincere hope that the delivery of this new TB Eradication Programme for Wales be driven forward by farmers, farming organisations and private vets, working in partnership with the Welsh Government, APHA and others, working together and taking significant steps toward eradicating this terrible disease.

Introduction

The purpose of this document is to set out key enhancements to the Wales TB Eradication Programme to be implemented from October 2017. The Delivery Plan sits under the Wales TB Eradication Programme which sets out our long term vision for the eradication of bovine TB in Wales, guiding principles and core values. The Delivery Plan allows the Welsh Government to react quickly and flexibly to the changing disease picture and new information. The Plan will be subject to review and updates will be made as and when necessary.

From 1 October 2017, a regionalised approach to TB eradication will be taken forward in Wales with the introduction of Low, Intermediate and High TB Areas. This means that measures can be tailored to address the varying risks and disease drivers in each 'TB Area'. A map showing the TB Areas can be found in Annex 1.

The consultation on a refreshed TB Eradication Programme that took place between October 2016 and January 2017 sought views on proposed actions to be applied in each of the TB Areas. It also sought views on proposals to be taken forward on a Wales-wide basis. The summary of responses to the consultation can be found at <https://consultations.gov.wales/consultations/refreshed-tb-eradication-programme>. Following consideration of the responses to the consultation the Cabinet Secretary for Environment and Rural Affairs has decided to implement measures in a phased approach. This Delivery Plan sets out the first phases of such an approach.

We are taking an enhanced approach to dealing with persistent TB breakdowns in Wales and plan to extend this approach to recurrent TB breakdowns in the future. This Delivery Plan sets out a number of further actions that will be taken in respect of these chronic¹ TB herd breakdowns.

Some of the changes set out in this Delivery Plan will require changes to the relevant legislation. The current legislation governing TB controls can be found at Annex 2.

Clearly this Delivery Plan cannot take account of all the potential scenarios that might occur in respect of individual TB breakdowns. Rather, it sets out the key Programme enhancements to be implemented in each of the TB Areas and those to be implemented on a wider basis across Wales.

Disease picture

The latest picture of disease is set out in Wales TB dashboard <http://gov.wales/topics/environmentcountryside/ahw/disease/bovinetuberculosis/bovinetberadication/tb-dashboard/?lang=en>. This is updated on a quarterly basis and contains all relevant TB statistics presented by region.

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

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

Key changes

Post-Movement Testing (PoMT) in the Low and Intermediate TB Areas

Consultation

The Welsh Government sought views in the consultation on requiring PoMT for moves into the Low and Intermediate TB Areas (and also between Intermediate TB Areas).

There were mixed views on PoMT but generally speaking respondents were agreeable to it in the Low TB Area to help identify undisclosed, “imported” infection quickly but disagreed with PoMT in the Intermediate TB Areas due to the fact that most animals would have had a Pre-Movement Test.

Welsh Government response

The evidence shows that most, if not all, of TB breakdowns in the Low TB Area are the result of undetected infection brought in through cattle movements. In the Intermediate TB Areas, cattle movements within and into these areas appear to be a high risk factor for the introduction of TB. The Welsh Government believes that introducing a PoMT requirement for movements into the Low and Intermediate TB Areas would protect these areas from the spread of undisclosed, “imported” infection.

What is changing?

From 1 October 2017, all cattle moved into the Low TB Area will require a PoMT. This includes any cattle moved from the High Risk and Edge Areas in England. Following review, the intention is to extend this policy to the Intermediate TB Areas in October 2018.

Pre-Movement Testing (PrMT) in the Low TB Area

Consultation

The Welsh Government sought views in the consultation on removing the PrMT requirement for movements within or from the Low TB Area.

Many responses received disagreed with the proposal – feeling that it was too soon to remove PrMT for movements within or out of the area. A number also thought it sends the wrong signal.

Welsh Government response

The majority, if not all, of TB breakdowns in the area are the result of undetected infection brought in through cattle movements from other areas. The Welsh Government believes it is

proportionate to remove the PrMT requirement for cattle movements from and within the Low TB Area. Farmers are of course, still able to PrMT their cattle if they so wish.

What is changing?

From 1 October 2017 PrMT will not be required for cattle moved within or from the Low TB Area. PrMT will continue to be required for cattle moved within, between or from the Intermediate and High TB Areas.

Clearing test in chronic TB herd breakdowns

Consultation

The Welsh Government sought views on not allowing the clearing test that lifts TB restrictions to be used as a Pre-Movement Test in the High TB Areas.

Many respondents were opposed to this approach in the High TB Areas. Many believed that the measure was excessive for farms with little history of disease and that it would be better used on a targeted basis. Concerns were raised about the additional time a herd would be prevented from selling stock and the belief that the proposal undermines the validity of the skin test.

Welsh Government response

The latest data show that, of all the breakdowns that were closed in 2014 in Wales, 35% suffered another TB breakdown within two years. This varies greatly by TB Area (ranging from 0% in the Low TB Area, to 43% in the High TB Area (West)). Whilst TB recurrence in a herd may be due to re-infection from a new source, in some

cases it may be because the disease was not fully eliminated from the herd when movement restrictions were removed. It therefore follows, if cattle were to undergo an additional test after movement restrictions were lifted, it would increase the opportunity to identify previously undisclosed infection before the animals were allowed to move off the farm. To ensure that animals cannot be moved off a farm subject to TB movement restrictions immediately after the clearing test will result in animals remaining on the farm for 60 days or more. Given the responses to the consultation, as an initial stage, this will be taken forward in chronic TB breakdown herds only and the results will be monitored.

What is changing?

From 1 October 2017 in chronic (persistent and recurrent) herd breakdowns, the clearing test will no longer be able to be used as a Pre-Movement Test.

Inconclusive Reactors (IRs) in chronic herd breakdowns

Consultation

The Welsh Government sought views on a number of approaches to dealing with IRs:

- Retesting IRs with the gamma interferon test (g-IFN) in OTFW herds and restricting those testing clear to the herd for life;
- Removing all IRs in the High TB Areas

There were mixed views on these proposals with few specific comments on retesting using g-IFN. Some felt that IRs in the Intermediate and High TB Areas should be removed while others felt they should not be removed as a large proportion of them would be slaughtered unnecessarily. The life time restriction of clear testing IRs evoked many negative comments – most believed that if they are a risk they should be slaughtered.

Welsh Government response

Recent analysis has been performed on testing data from the 10 most persistent herd

breakdowns in Wales involving 14,723 animals between 2010 and 2015. Approximately 19% of the total number of animals became reactors during the period. Approximately 45% of the animals that had been identified once only as an IR under standard interpretation and 38% of animals that had been identified once only as an IR under severe interpretation had subsequently become reactors at further testing during the period. These percentages varied between individual farms. The data from these 10 most persistent breakdown herds provide evidence that a high proportion of both standard and severe IRs will eventually become reactors.

What is changing?

As part of the ongoing Action Plan process, all IRs in chronic herd breakdowns will be slaughtered. Persistent breakdowns will be focussed on initially. Further consideration will be given to the wider policy of dealing with IRs.

Compensation for within herd movements in chronic herd breakdowns

Consultation

The Welsh Government sought views on reducing compensation for keepers who wish to move cattle between units within the same herd in chronic herd breakdowns.

There were mixed views on this proposal. Some felt it is unfair to penalise farmers for moving cattle within their CPH and the practical difficulties it could create. Others recognised that intra herd movements while in a breakdown situation could result in spread of disease.

Welsh Government response

While a herd is under TB restrictions, it is possible for a farmer to move cattle to other sites included in their CPH. This potentially presents a significant risk of disease spread as it enables continual movement between separate units with potentially different levels of risk and subsequent mixing of sub-populations of cattle, each with its own level of risk associated with it. This is likely to perpetuate the problems of disease circulation within the herd.

The management of herds over multiple sites is a common feature of herds which have been under restrictions for a lengthy period of time.

The Welsh Government believes that the ability to reduce TB compensation for within herd movements is an important tool to reduce the number of within herd/unit movements which could lead to the persistence of the disease in a

herd. There is already a compensation reduction policy in place for cattle movements into a TB restricted holding and the new policy complements this approach.

What is changing?

In chronic herd TB breakdowns, but focussing on persistent breakdowns initially, where cattle are moved under licence within a CPH, compensation will be reduced to 50% if they are subsequently slaughtered as a result of TB. Farmers will be given appropriate time in order to restructure their holding before this policy takes effect and implementation will vary according to the status of a breakdown:

- New breakdowns. From 1 October, at the beginning of a TB breakdown, farmers will be informed that the policy will be implemented if the herd becomes persistent (i.e. after 18 months under restriction).
- For existing persistent breakdowns, farmers will be informed that compensation reduction will apply from 1 April 2018. However, they may be given a period of up to 12 months to make changes before the policy fully applies, for example if this involves the erection of a new building.
- Breakdowns that become persistent after 1 October will be given six months before compensation reduction applies (or up to 12 months in line with the above).

Compensation Cap

Consultation

The Welsh Government sought views on introducing a compensation cap of £5,000 and to continue to review the compensation regime.

There were mixed views on the £5,000 cap. Some recognised it was needed to make the system more fair and sustainable, others felt that it would discourage farmers from investing in higher quality animals. There were also concerns that insurance would not be a viable option due to the cost of the premiums.

Welsh Government response

The purpose of the cap is to protect the Welsh Government from the cost of compensation for the highest value animals. A lower compensation cap is a simple solution aimed at preventing

overvaluation of the highest value cattle – those where, because of the subjective nature of the system, overvaluation may be more likely to occur. Reducing the cap to £5,000 will also make sure the compensation system is financially sustainable. In 2015-16, if the £5,000 cap had been in place, the value of only 95 animals would have been affected (around 1% of all cattle slaughtered). In longer-term alternative approaches, in isolation or in combination, may better meet the objectives and are therefore worthwhile exploring further.

What is changing?

From 1 October 2017 the current £15,000 cap on TB compensation payable per animal will be reduced to £5,000. Further analysis will be undertaken on alternative approaches to compensation in Wales.

Exempt Finishing Units (EFUs)

Consultation

The Welsh Government sought views on applying more stringent controls to EFUs or ban EFUs in the Low TB Area.

There was no clear agreement on EFUs but a number recognised their value to the industry.

Welsh Government response

Between January 2015-December 2016 there were at least 15 new breakdowns in the 21 EFUs

in existence at the time in Wales. As demonstrated by the number of breakdowns in these herds, EFUs do pose a risk of spread of disease.

What is changing?

EFUs will be phased out by 1 January 2018

Biosecurity Requirements Notices (BRNs)

Consultation

The Welsh Government sought views on issuing bespoke biosecurity improvement notices as necessary to all OTFW breakdowns in the High TB Areas.

Comments were generally supportive of this approach but respondents were keen for notices not to be overly bureaucratic or place unreasonable demands on farmers.

Welsh Government response

In chronic herd breakdowns, it is very important for high standards of biosecurity to be adopted as any deficiency might contribute to the persistence

of disease or could lead to a significant risk of disease transmission. As an initial stage, to improve biosecurity standards on farms, bespoke BRNs shall be issued as necessary to OTFW chronic herd breakdowns (focussing on persistent breakdowns in the first instance).

What is changing?

As part of the ongoing Action Plan process, BRNs will be issued as necessary to OTFW chronic breakdown herds and compensation will be reduced in cases of non compliance. Persistent breakdowns will be focussed on initially. Standardised biosecurity guidance will be made available to all farmers.

Wildlife

Consultation

The Welsh Government sought views on different high level approaches to wildlife in each of the TB areas:

- Monitoring the level of infection in badgers in the Low TB Area,
- Encouraging badger vaccination when available in the Intermediate TB Areas, and
- Explore and develop ways to break the transmission cycle between cattle and badgers where it can be demonstrated that badgers are contributing the problem in chronic herd breakdowns in the High TB Areas.

Many respondents were positive about continuing a Badger Found Dead survey to increase knowledge on the disease in badgers. The majority of responses disagreed with badger vaccination given the unknown impacts of the vaccine.

Proposals for chronic breakdown herds in the High TB Area were welcomed but a number felt that more detail was required. Most respondents believed that a cull of badgers was necessary because eradication will not be achieved by only tackling the disease in cattle.

Welsh Government response

Where infected animals are found, either cattle or badgers, it is reasonable and proportionate to remove them as possible sources of infection to break the cycle of transmission. Interventions will be monitored closely and adapted if necessary.

What is changing?

- A Badger Found Dead Survey will continue across Wales.
- The Welsh Government will continue to assess the most appropriate deployment of the Badger BCG vaccine if and when it becomes available.
- As part of the ongoing Action Plan process, where the Welsh Government views that badgers are contributing to the persistence of disease in chronic herd breakdowns, badgers will be trapped and tested on the breakdown farm and test positive badgers will be humanely killed. Persistent herd breakdowns will be focussed on initially.

Dealing with chronic herd breakdowns

In her statement in October 2016, the Cabinet Secretary for Environment and Rural Affairs set out the intention to put in place Action Plans for chronic herd breakdowns aimed at clearing up infection. Chronic herd breakdowns encompass those which have been under TB restrictions for 18 months or longer and herds that suffer recurrent breakdowns. Action Plans will be bespoke to the farm in question and will be developed in partnership with the farmer, vet and APHA.

As an initial stage, Action Plans will be developed for persistent herd breakdowns (those lasting

18 months or longer). It is anticipated that, in due course, development of Action Plans will be extended to recurrent breakdowns. Currently all chronic herd breakdowns are located in the Intermediate and High TB Areas.

Since the statement, work has been underway on developing a template for the Action Plans and a number have already been drawn up and agreed between the farmer, their private vet and APHA. Work continues to draw up plans for the other persistent TB breakdowns in Wales.

Forecasting

Forecasting for TB purposes, even for the short term, is very difficult and the extent to which we achieve targets and milestones can depend on a variety of factors. One key factor that our whole TB Eradication Programme is reliant upon for success is the collaboration and partnership with our stakeholders. Government, farmers, vets, delivery partners and agencies, valuers and auctioneers, hauliers and abattoirs all have roles to play in our Programme. We will not eradicate this disease without effort and co-operation from all concerned.

Significant progress has been made since the peak in TB levels in Wales seen in 2008-09. The trend in the number of new TB incidents has fallen by 41% since 2008 and by 15% in the last

year alone. Recent increases in the number of cattle slaughtered primarily reflect increased use of the high-sensitivity interferon-gamma test for TB and severe interpretation of the skin test.

Work is underway to produce a formal eradication target as well as interim milestones for Wales as a whole and on a regional basis. We expect to be able to report on this later in the year.

In the meantime, our immediate targets are to sustain and build upon the recent progress that has been made. This includes preserving the low levels of disease in the Low TB Area, driving down both incidence and prevalence in the Intermediate and High TB Areas and the number of persistent breakdowns.

Monitoring and review

TB trends are monitored through a range of regular analyses and reports. For example:

- Monthly statistics showing numbers of new incidents, animals slaughtered for TB control and tests carried out.
- Quarterly reports with statistical and epidemiological analysis of incidence, prevalence, recurrence and other relevant features of disease progression. Summarised in the Wales TB dashboard <http://gov.wales/topics/environmentcountryside/ahw/disease/bovinetuberculosis/bovinetberadication/tb-dashboard/?lang=en>.

- Detailed annual reports such as the Wales Annual Surveillance Report <http://gov.wales/docs/drah/publications/160718-annual-surveillance-report-2015.pdf> and the Intensive Action Area comparison report <http://gov.wales/docs/drah/publications/160404-iaa-cattle-comparison-report.pdf>.

The TB dashboard features data at the level of the new TB Areas as of the 2016 Quarter 4 update, which was published in May 2017.

This Delivery Plan will be subject to review and updates will be undertaken as and when necessary. As time goes on, the boundaries for the TB Areas will also be reviewed and changes will be made when it is appropriate to do so.

Communications

The Welsh Government is committed to meeting regularly with stakeholders during the course of the first year of implementation.

Cattle keepers will be contacted in due course to inform them in which TB Area their farm is located and the specific requirements for that area. APHA can provide further detailed information on what these changes mean for you. APHA can be contacted on 0300 303 8268

The Welsh Government will continue to work closely with other Government administrations, particularly Defra, to ensure a joined up approach where it is appropriate.

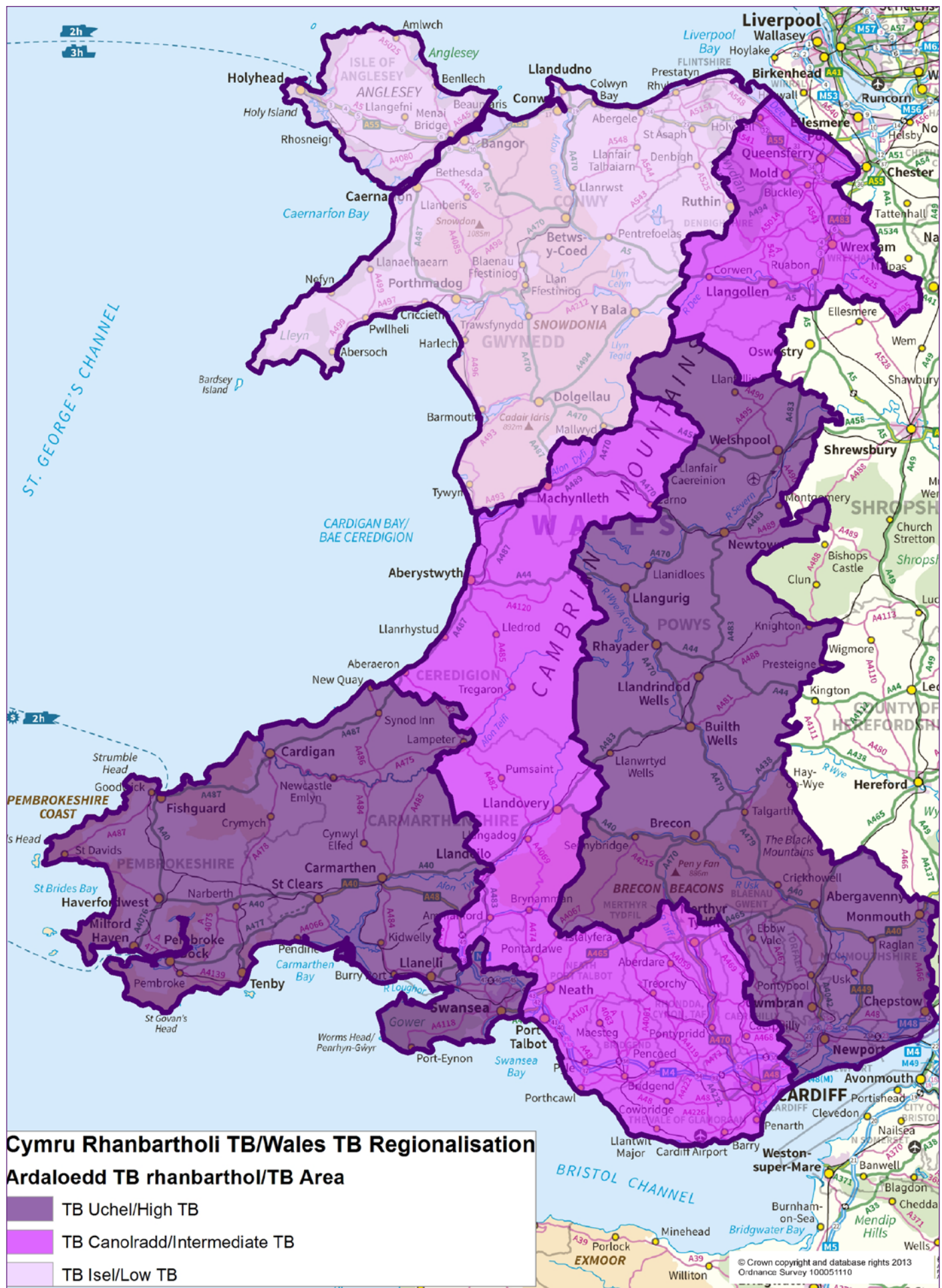
Wales-wide measures

Measure	Change
Exempt Finishing Units (EFUs)	EFUs will be phased out by 1 January 2018.
Review of gamma interferon test deployment	A review of the current usage of the gamma interferon test will be undertaken to ensure deployment is tailored to achieve maximum benefits.
Inconclusive Reactors	Notwithstanding the changes to the IR policy in chronic herd breakdowns, further consideration will be given to the general management of IRs in non-chronic herd breakdowns.
Online biosecurity package	This will be a longer term goal of the Wales TB Eradication Programme. To support the wider package in the shorter term a 'Biosecurity App' will be developed.
Compensation cap	A cap of £5,000 per animal will apply from 1 October 2017. The compensation regime will be subject to a wider review as part of the Wales TB Eradication Programme.
Cross compliance	Ensuring non-compliance is effectively dealt with is a core value of the Wales TB Eradication Programme. Further consideration will be given to further farm subsidy penalties and/or issuing fixed penalty notices.
Non-bovines	A passive bovine TB surveillance scheme in non-bovines will be maintained.
Informed Purchasing	While farmers will continue to be encouraged to make available the disease history of their herds at the point of sale, the development of an Informed Purchasing Scheme will be a longer term goal of the Wales TB Eradication Programme.
Governance	The governance of the Programme will be given further consideration with a view to ensuring appropriate and effective arrangements are in place.

Regionalised approach

Measure	Low TB Area	Intermediate TB Area(s)	High TB Area(s)
Surveillance testing	Annual herd testing (no change)		
Six monthly testing for high risk herds	No change at present		
Pre-Movement Testing (PrMT)	From 1 October 2017 no PrMT required for movements within and from the Low TB Area	Yes (no change)	
Gamma interferon blood testing (IFN-γ)	No change at present		
Post-Movement Testing (PoMT)	From 1 October 2017 cattle moved into the Low TB Area will require a PoMT	No change at present. Following review in the Low TB Area, it is the intention to require PoMT for cattle moved into the Intermediate TB Areas from October 2018	No change at present.
Management of Inconclusive Reactors (IRs)	No change at present	In chronic herd breakdowns all IRs will be slaughtered. Currently no change in process for dealing with IRs in non-chronic herd breakdowns	
TB breakdown management	No change at present	From 1 October in chronic herd breakdowns, the clearing test will not be allowed to be used as a PrMT	
Compensation reduction for intra herd movements in chronic breakdowns	No change at present	Compensation will be reduced for licenced intra-herd movements in chronic breakdown herds. Implementation date will depend on the status of the breakdown	
Biosecurity Notices (BRNs)	No change at present	BRNs will be provided as necessary to chronic OTFW herd breakdowns	
AFUs	Not permitted (no change)	Indoor only (no change)	
Cymorth TB	Continue to offer Cymorth TB visit to breakdown herds. Work towards expansion of Cymorth TB to all herds.	Continue to offer Cymorth TB visit to breakdown herds (no change).	Continue to offer Cymorth TB visit to breakdown herds. Work towards expansion of Cymorth TB to all herds.
Wildlife	A Badger Found Dead Survey will be undertaken.	A Badger Found Dead Survey will be undertaken. Badger vaccination will be reviewed when vaccine is available. Where we view that badgers are contributing to the persistence of disease in chronic herd breakdowns, we trap and test badgers on the breakdown farm and remove test positive animals by humane killing.	A Badger Found Dead Survey will be undertaken Where we view that badgers are contributing to the persistence of disease in chronic herd breakdowns, we trap and test badgers on the breakdown farm and remove test positive animals by humane killing.

Annex 1: Wales TB Regionalisation June 2017



Annex 2: Legislation

European legislation

The requirements for routine testing of cattle for bovine TB are set out in EU Directive 64/432/EEC (<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1964L0432:20071113:EN:PDF>) which covers health requirements for cattle and pigs. This and other EU Directives 77/391/EEC (<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31977L0391&from=en>) and 78/52/EEC (<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31978L0052&from=EN>) require Member States to develop eradication programmes in order to accelerate, intensify or carry through the eradication of bovine TB.

Domestic legislation

The Animal Health Act 1981 (http://www.legislation.gov.uk/ukpga/1981/22/pdfs/ukpga_19810022_en.pdf) confers powers relating to the testing and slaughter of animals.

The following subordinate legislation has also been implemented:

- The Tuberculosis (Wales) Order 2010 (as amended) (http://www.legislation.gov.uk/wsi/2010/1379/pdfs/wsi_20101379_mi.pdf) confers powers relating to the prevention of the spread of bovine TB in cattle and provides for the calculation of the value of a bovine animal that is slaughtered for TB
- The Tuberculosis (Wales) Order 2011 (as amended) (http://www.legislation.gov.uk/wsi/2011/692/pdfs/wsi_20110692_mi.pdf) puts the prevention and management of incidents of bovine TB in camelids, goats and deer on a similar footing to the arrangements already in place for cattle.
- The Tuberculosis (Testing and Powers of Entry) (Wales) Order 2008 (http://www.legislation.gov.uk/wsi/2008/2774/pdfs/wsi_20082774_mi.pdf) confers powers relating to entry on to a holding to enforce TB testing if necessary

