



**Evidence submitted by NFU Cymru to the Welsh
Assembly's Rural Development Sub-Committee on the
ISG Report on bovine TB and on the implementation of
the recommendations of the EPC following its inquiry
into bovine TB**

INDEX

Page 1	Conclusions and Recommendations
Page 2	NFU Cymru's response to ISG Report
Page 7	NFU Cymru's views on the implementation of the EPC following it's inquiry into bovine TB

Appendices

Page 10	Appendix A
Page 11	Appendix B
Page 12	Appendix C

Conclusions and Recommendations

ISG Report

- NFU Cymru is astounded at the report's failure to offer any solution to TB infection spread from infected badgers (paragraph 2)
- NFU Cymru does not accept that a culling strategy that avoids perturbation cannot be devised (paragraph 4)
- ISG's conclusion that badger culling can make no meaningful contribution to cattle TB control in GB reflects the inadequacies of the RBCT rather than culling per se. (paragraph 5)
- The ISG report contains only a partial cost benefit analysis (paragraph 6)
- The ISG report should not be taken in isolation but due regard should be given to other trials (paragraphs 3, 9)
- The Welsh Assembly Government should build on the RBCT analysis and proceed with an intensive treatment area where there is thorough and regular culling within a relatively large area bounded by hard physical boundaries (paragraphs 10,11,12,13)
- NFU Cymru refutes the ISG's contention that farmers have not taken 'ownership of the TB disease problem in their cattle herds rather than leaving it largely to Government to resolve.' (paragraph 17)
- NFU Cymru regards the ISG's view that the Government should focus entirely on efforts to stop cattle to cattle transmission as flawed and inconsistent with VLA findings (paragraphs 18,19,20)
- Increased use of the Gamma Interferon test has implications for the Welsh Assembly Government's budget and the economic sustainability of farms in hot-spot areas (paragraphs 21, 22)
- NFU Cymru cannot support the notion of Zoning the country for cattle movement purposes (paragraphs 23, 24).

Implementation of EPC recommendations on bovine TB:

- NFU Cymru does not believe that the 'holistic' approach advocated by the EPC committee is being adopted (paragraphs 26, 30)
- Pre-movement testing has proven cattle movements to be a negligible factor in the spread of disease but has placed a heavy burden of cost on the industry (paragraph 27)
- Experience has shown that Animal Health (SVS) are having difficulty coping with the removal of reactors. A feature that the gamma interferon test will exacerbate unless more resources are available (paragraph 28)
- It was anticipated that the badgers found dead survey would inform decisions on wildlife interventions. Despite high incidences of disease which are likely to be underestimates of infectivity this has not transpired. NFU Cymru now believes there is sufficient scientific evidence to support its firm conclusion that a significant area, with hard physical boundaries to prevent perturbation and with regular thorough culling would produce a significant reduction in bovine TB (paragraphs 31,32 and 33)
- NFU Cymru recommends that the TB action group should continue (Paragraph 35)
- NFU Cymru points to the fact that the industry already contributes significantly to the costs of bovine TB(Paragraph 35)
- An eradication strategy has to be properly financed and Government has to shoulder the responsibility for the consequences of its past intransigence (Paragraph 36)



Evidence submitted by NFU Cymru to the Welsh Assembly's Rural Development Sub-Committee on the ISG report on bovine TB and on the implementation of the recommendations of the EPC following its inquiry into TB

1. NFU Cymru welcomes the opportunity to submit written evidence to the Welsh Assembly's Rural Development sub-committee on the ISG's report on bovine TB and on the implementation of the recommendations of the EPC following its inquiry into TB. These are very much NFU Cymru's initial views on the ISG report since there are areas on which we hope to undertake some further analysis.

ISG Report

2. NFU Cymru is astounded at the report's failure to offer any solution to TB infection spread from infected badgers, especially as it acknowledges that this is a significant cause of disease in cattle P14 (12). But given that the ISG indicate that they had 'been given a very explicit declaration by Ministers at the outset that elimination of badgers over large tracts of the countryside was not acceptable as future policy' P39(2.27) this may have influenced their objectivity.
3. The ISG report does however make reference to the Thornbury, Gloucestershire trial where the intensive and repeated gassing of badgers over an area of some 100km² between 1975 and 1982 was followed by a period of ten years with no confirmed breakdowns (Clifton Hadley et al) P28 (1.4). The outcome of experiments in Steeple Leaze, Dorset, Hartland in Devon and East Offaly in Ireland all produced reductions in TB in cattle following badger removal operations but because of the lack of comparable control areas these outcomes have never been treated as 'scientifically' robust and hence the Randomised Badger Culling Trial was devised.
4. We accept that culling as practiced in the Randomised Badger Culling Trial (RBCT) did cause perturbation and did result in disease being spread to herds on the perimeter of culling zones. However, that was because of the incomplete and inefficient culling strategies that were tested in the trials. We do not accept that a culling strategy that largely avoids the problem of perturbation cannot be devised, particularly given the experience of other culling programmes and we therefore reject Professor Bourne's conclusion that 'badger culling can make no meaningful contribution to cattle TB control in Britain'.

5. NFU Cymru's preliminary view is that the conclusions reached by the ISG are more a reflection of the inadequacies of the RBCT than of badger culling per se. This view is based on the following facts:
- Even in the proactive culling areas, the proportion of badgers trapped was so low — ranging from 20% to 70% and averaging around 40% - that perturbation was bound to be a problem. We have known for at least 30 years that partial control of badgers is likely to be worse than no control at all and that the key to a successful cull is to achieve as close as possible to 100% control within whatever the target area or group may be in as short a time as possible;
 - The ISG found that culling, as performed in the trial had a negative effect on the incidence of disease in cattle over small areas and only began to show small net disease benefits when undertaken repeatedly over 4 years over large areas P98 (5.32) because of perturbation. This we acknowledge was bound to happen but the way ISG extrapolated these findings using modelling techniques to conclude that the same basic principles would apply however badgers were culled even if culling was near to 100% is challenged;
 - These very low capture rates were hardly surprising, given that in the RBCT, badgers were trapped for an average of only 8 days per year P50 (2.54). The strategy adopted by the Defra Wildlife Unit in the years before the trial was to continue trapping for as long as necessary to ensure complete removal of all badgers on infected farms, sometimes up to 3 months. The Ireland study also operated a high frequency of removal operation which was felt necessary to maximise removal of all resident badgers and any migrating into the area from elsewhere;
 - Consent status for culling changed as landowners altered their consent. Thus the number of farms participating became variable as did the time they were culled within particular triplets giving concerns as to the quality of data obtained P46 (2.49);
 - It was suggested that by October 2003, 57% of traps had been interfered with and a further 4% were stolen due to the ISG posting the start time and place of the first trapping exercise on their website P41 (2.33);
 - The ISG study operated a closed season in response to concerns that cub welfare would be jeopardised. Both the Dunnet and Krebs reports asserted that this practice was incompatible with an effective disease control strategy P40 (2.28);
 - The Reactive Culling Triplets were abandoned early in 2003 following an apparent rise in cattle infection. However, this decision was heavily criticised by the Independent Scientific Review of the RBCT conducted by Professor Charles Godfray and colleagues. They argued that 'at most sites, there was insufficient time between the implementation of reactive culling and the increase in cattle disease to make this a likely explanation for the observed effect';
 - The diagnostic methods used were not 100% sensitive and the probability of detecting infection in badgers varied according to laboratory and according to method of storage with the result that prevalence of disease was likely to be underestimated P72 (4.16). This has implications too for the level of infectivity found under the 'badgers found dead' survey in Wales.
 - A range of culling methods, including gassing, should have been included in the ISG work. The conclusions reached by this study relating to badger controls can only be used when qualified by the statement, 'when trapped and culled in the method as used during the ISG study'.

6. The report contains a partial cost benefit analysis of culling which indicates that the cost of culling greatly exceeds the benefit in terms of the number of cases of bTB prevented. NFU Cymru's view of this analysis is:
- That it is only valid for the method of culling used in the trial;
 - The analysis should have been conducted over a longer time span;
 - No attempt has been made to consider the economic, social and ecological cost if cattle farming were to be made unviable in some areas of the country;
 - No cost benefit analysis was made of the ISG's proposals of cattle-based control measures.
7. NFU Cymru believes it is vital that the ISG report is not taken in isolation but in conjunction with the other scientific reviews that have taken place over the years of Paragraph 3 . We would urge the Welsh Assembly Government to examine **all** the scientific evidence available including that of the Irish experience and to apply existing knowledge.
8. Professor Simon Moore discussed at the 2nd Annual TB Conference the work in Ireland investigating the impact of badger removal on the control of tuberculosis in Irish cattle herds. This concluded that perturbation of badgers was not a significant problem if culling were carried out over a sustained period of time and using hard geographic boundaries or controlled buffer zones and conducted in such a manner that culling was effective and efficient. (The findings of the research were peer reviewed in Preventative Veterinary Medicine 67 (2005).
9. In Ireland, the number of TB reactors has fallen by 42.6 per cent (2006 as compared with 2002) in the five years since the Government there adopted its current badger culling strategy. This operates as follows; in the event of a new outbreak of bovine TB in a herd of cattle, cattle tracings are checked to see if there is prima facie evidence that the disease had spread through cattle to cattle contact. In the absence of such evidence, badger setts within a 2km radius of the infected holding are surveyed and subsequently culled. This involves intensive snaring — using stop snares, which restrain but do not choke or strangle the animal — over 7 to 10 days, every six months, for the duration of a five year period. This is very similar to the 'clean ring' strategy that very nearly succeeded in eliminating TB in the UK in the early 1980s, and could form the basis for a similarly effective strategy in Wales.
10. We accept that the Irish situation is not directly comparable to that in Wales because of our higher badger densities, and the fact that, in the hotspot areas, TB is now endemic in the badger population. We would therefore suggest that the Welsh Assembly Government and the industry, working in partnership, build on the approach recommended in the final analysis of the RBCT. This would involve:
- thorough culling,
 - regular culling,
 - culling within relatively large areas,
 - areas bounded by hard physical boundaries wherever possible.
11. The ISG report states P90 (5.16) 'no such effect (..... on association between repeated proactive culling and increased m.bovis infection in badgers....)was seen where coastline, major rivers or motorways formed a substantial proportion of trial area boundaries. Hence, geographical barriers to badger movement might also be expected to influence the impact of badger culling on cattle TB...'

12. Supporting information to the ISG report¹ provides measures of boundary permeability for 10 proactive culling areas Triplet A at 0.69 illustrated a low permeability score i.e low migration of badgers and the permeability score of all 10 proactive culling areas with small watercourses i.e. hard boundaries showed a reduction. Triplet B showed a reduction from 1.0 down to 0.74 but even in Triplet F where there was a low permeability score of 0.55 the permeability score with small watercourses was still further reduced to 0.49. Thus confirming that hard boundaries can influence badger perturbation. Supporting documents² confirm the location of the 10 triplet areas. Triplet A is located in Hereford with Triplet F located in Cornwall. These areas each exhibit very different geographic characteristics and yet low perturbation rates were achieved at both locations where boundaries impeded migration.
13. NFU Cymru therefore is confident that a combination of the thoroughness of the cull and hard physical boundaries would minimise perturbation P82 (4.38). NFU Cymru believes that Wales is well – placed to address this deficiency in the RBCT and to test this hypothesis in the field.
14. In the event of badger-linked TB outbreaks occurring outside the core hotspot areas, then a policy very similar to the Irish strategy should be followed.
15. At an industry-wide stakeholder meeting at a GB level in August 2006, a strong consensus was reached on how culling should be approached at a strategic level, summarised as follows:
 - (i) Industry participation in a badger culling programme can only be in the context of a genuine partnership with Government, involving their providing overt facilitation, mapping, monitoring, carcase disposal and other support.
 - (ii) TB Control Strategy Groups should be setup, aligned with DVM areas, involving farmers, vets, Animal Health, SVS and other stakeholders to determine overall strategy for their area, to advise on the delineation of control areas and facilitate the creation of local TB management groups.
 - (iii) Culling to be carried out by trained contractors engaged by TB management groups using cage traps and shooting in the short-term, and CO (carbon monoxide) gassing and, possibly, stop snaring, when these methods are approved.
 - (iv) Under licence, culling to be focused in the first instance on disease hotspots within the framework of larger control areas, in most cases of at least 300 sqkm, ideally bounded by hard physical boundaries.
 - (v) The industry and Government to work together to develop a strategy that will allow healthy badgers and cattle to co-exist post-clearance. Full support to be given to the ongoing development of vaccines.

1. Culling and controls influence tuberculosis risk of badgers, Rosie Woodroffe et al supporting table 12 (Appendix A).

2. Culling and controls influence tuberculosis risk of badgers, Rosie Woodroffe et al supporting Fig 4 (Appendix B).

16. NFU Cymru regards this industry statement, which clearly pre-dates the ISG report, as **clear** indication of the industry's willingness to work in partnership with Government to tackle this disease. Given this commitment it is hard to see how the ISG report can conclude that 'farmers need to take ownership of the TB disease problem in their cattle herds rather than leaving it largely to Government to resolve' (10.91). the industry is engaged but Government has to shoulder responsibility for the consequences of its past intransigence.
17. The ISG's conclusion that the Government should focus entirely on efforts to stop cattle to cattle transmission of bovine TB in the belief that cattle movement is a significant cause of the spread of the disease is not in NFU Cymru's view substantiated by science since VLA evidence on spoligotypes suggest a close geographical relationship between specific types of bovine TB in badgers and cattle rather than a mixed and non clustered random pattern.
18. Furthermore, ISG indicate that the spatial associations between infections in cattle and badgers provide evidence of transmission between the two host species cattle and badgers but cannot demonstrate the direction of transmission P83 (4.42). (4.44) Given this, it seems short sighted in NFU Cymru's view to concentrate solely on cattle to cattle transmission when the ISG acknowledges that badger to cattle transmission may be generated.
19. NFU Cymru, whilst accepting that everything feasible should be undertaken to identify and eliminate the disease in cattle provided this is done in parallel with tangible action to deal with the spread of disease by infected badgers, stresses that control measures must be cost-effective and not so draconian as to make it impossible for viable cattle farming to continue.
20. We are currently assessing the costs of the various ISG recommendations to keepers of cattle. But inevitably wider use of gamma interferon will result in a substantial increase in the number of cattle being slaughtered as reactors. Both the additional testing and the additional compensation for slaughtered cattle will have a significant bearing on the TB budget.
21. In addition, experience from using the gamma interferon test shows that farmers in hot-spot areas can expect to lose up to 30% of their herd. At that level, the consequential losses are economically unsustainable so that additional compensation would be needed.
22. The ISG report suggests that cattle movement could be controlled by zoning the country into relatively low disease risk and high risk areas and by prohibiting animal movement from high to low risk areas or by categorising farms as of either low or high risk status and to control movement between these categories, NFU Cymru could not support such approaches which would create a two-tier market and result in lower prices for those designated as 'high-risk'.
23. There is a danger that retailers' buying patterns would quite unjustifiably be based on risk status when in fact there is no reason other than a marketing ploy for such an approach. The whole infrastructure of the industry and ancillary industries could be jeopardised.

Conclusion on ISG report

24. To reiterate, NFU Cymru does not accept the ISG's contention that badger culling can make 'no meaningful contribution' to reducing TB in cattle and we find this to be at odds with the findings of the randomised Badger Culling Trials (RBCT) which found that repeated culling can be beneficial. NFU Cymru believes that thorough, regular culling over relatively large areas bounded by hard physical boundaries would produce a significant reduction of bovine TB. NFU Cymru highlights ISG's own admission that the RBCT was not designed to test the impact of boundary permeability although supporting papers point to the fact that boundary permeability has a significant bearing on badger migration. This gap in understanding needs to be urgently addressed in a Welsh context. We regard the partial cost benefit analysis undertaken by the ISG as both flawed and incomplete and will be looking to present our own analysis in due course. In the meantime, the forgoing should be regarded by the sub-committee as our initial response on the ISG report.

Implementation of EPC recommendations on bovine TB

25. For ease of reference, a progress report on recommendations of the EPC Inquiry into bovine TB is attached appendix 6 and NFU Cymru welcomes the opportunity to comment on some of the outcomes of these recommendations.
26. NFU Cymru does not accept that a 'holistic' approach is being taken to contain the spread of disease. Measures implemented continue to focus on cattle despite the fact that the ISG report acknowledges that infected badgers are a significant cause of disease in cattle P14 (12). The incidence of disease continues to escalate.
27. Pre-movement testing, phases 1&2, have been introduced. This has placed a heavy financial burden on the industry but has been shown to be a negligible factor in the spread of TB infection. To the end of April 2007, 92,316 cattle have been pre-movement tested in Wales, of which, just 113 were reactors, 0.12% (A similar percentage was identified in England).
28. This paper has alluded previously to our concern that use of the gamma interferon test can result in farmers in hot spots losing up to a third of their herd and the fact that this is economically unsustainable but we are concerned too that use of this test has generated additional new outbreaks with the result that Animal Health (formerly SVS) are in some areas having difficulty in coping with the removal of reactors off farm and with their posing a potential source of further infection until such time as they are removed and despatched.
29. NFU Cymru questions the value of the Disease Report Form which took over from the TB99 form given that the ISG report could find no correlation in the circumstances and even contradiction in the analysis P136 (6.42).
30. NFU Cymru supported the introduction of the Biosecurity Intensive Area which is designed to pilot advice to cattle keepers on measures such as those recommended by the Independent Husbandry Panel. But the Union's support for this was in the expectation that a 'holistic' approach would be taken and that an 'intensive treatment area' would in parallel be implemented. (See response to recommendation 2). It has not been.
31. The Badgers found dead survey was designed to show the proportion and geographical distribution of badgers found dead in Wales infected with TB and it was understood that 7

32. this information would be used to inform decisions on wildlife interventions. To date, it has not, even though the results showed an average of 12% of badgers found dead had TB (55 out of 457 found dead badgers tested positive for the disease on culture.) In TB hotspots such as Monmouthshire and Carmarthenshire disease was found at levels of 28% and 16% respectively in badgers found dead. Since the survey was conducted the ISG report has shown that rapid standard necropsy followed by culture and Ziehl Neelsen staining is not 100% sensitive and that the likelihood is the prevalence values reported are likely to be underestimates of the level of infectivity.
33. The final VLA report on the badger found dead survey scientifically corroborated that the badger is an important component in the epidemiology of bovine TB in areas of high cattle incidence and points to cross infection between the two species and this further scientific evidence in NFU Cymru's view corroborates our view that targeting control measures **only** at cattle will not stop the advance of bovine TB.

Recommendation 2

34. The EPC's recommendation that an 'Intensive Treatment Area' should be an integral part of the development of Wales' TB controls has only been selectively applied, with to date, no actions proposed for diseased wildlife nor for a wildlife intensive treatment area. NFU Cymru believes that there is now sufficient scientific evidence to support its firm conclusion that a significant area, with hard physical boundaries to prevent perturbation and with regular and thorough culling would produce a significant reduction in bovine TB.

Recommendation 3

35. NFU Cymru believes that measures that deal with both cattle and wildlife infectivity should be rolled out swiftly once proven. EPC recommended that the sharing of costs of funding between the farming industry and the Welsh Assembly Government should be considered. These are already being met jointly by industry and Government and discussions continue on cost **and** responsibility sharing.

Recommendation 4

36. As a Ministerial body set up under the last Administration it now falls to the Minister for Sustainability and Rural Development to decide whether the TB action group should continue. NFU Cymru has already recommended to the Minister that the Group should continue. In terms of cost sharing NFU Cymru has made it abundantly clear that this will be considered only if cost and responsibility is shared, provided that a complete cost-saving review is undertaken, that no pre-emptive decisions are taken of the consideration at an EU level and provided that there is evidence of a partnership approach with clear and definitive steps to tackle the problem of TB in both wildlife and cattle.
37. The EPC recommended that the cattle valuation process be investigated and NFU Cymru was relieved that tabular valuations, as put forward by the last Administration, were rejected by the National Assembly for Wales in May 2006 and that there has been a subsequent commitment to individual valuation but with more monitoring and scrutiny of the valuation process. It is however, no exaggeration to say that this has unnerved the industry and there is a genuine concern at the rising costs of bovine TB to both the industry and Government and the budgetary implications thereof. But NFU Cymru is convinced that an eradication strategy has to be properly financed and that short term pain in budgetary terms has the potential to produce longer- term gains but in the meantime Government, we reiterate, has to shoulder responsibility for the consequences of its past intransigence.

Recommendation 5

38. NFU Cymru shares the view that there has to be a co-ordinated GB wide approach in terms of surveillance controls and Research and Development that respects the responsibilities of devolved Government.

Conclusion

39. NFU Cymru hopes that its views will be taken fully into consideration in the context of the Rural Development Committee's inquiry and looks forward to giving oral evidence in due course.

Mary James
Deputy Director/Head of Policy
NFU Cymru

Appendix A

Culling and cattle controls influence tuberculosis risk for badgers – Woodroffe et al supporting Table 12

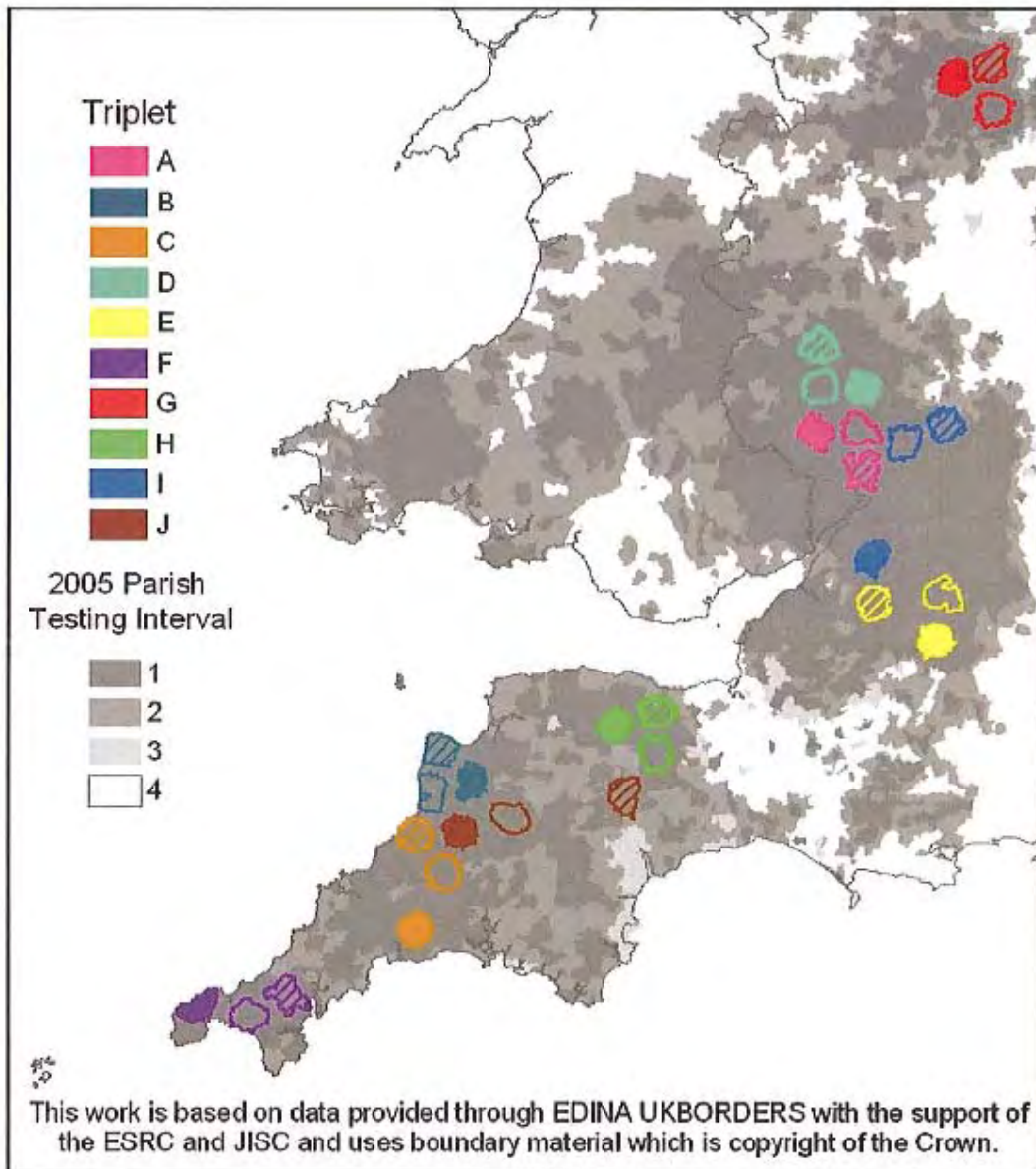
Measures of boundary permeability for 10 proactive culling areas.

Triplet	A	B	C	D	E	F	G	H	I	J
Permeability score	0.69	1.0	1.0	0.98	0.83	0.55	0.85	0.99	0.91	1.0
Permeability score (with small watercourses)	0.69	0.74	0.78	0.92	0.83	0.49	0.72	0.80	0.86	0.85

Appendix B

Culling and Cattle controls influence tuberculosis risk for badgers – Woodroffe et al

Supporting Figure 4



Appendix C

EPC(2) 02-07 (p1) Annex 2

EPC Committee Inquiry into bovine TB: Recommendation Status

The reference for each sub-recommendation has been provided for ease of reference and was not part of the inquiry report.

Rec	Description	Intention	Progress Made	Future Intention	Desired Outcome
1.1	Implementation of pre-movement testing across Wales, with cattle sale dependent on a valid pre-movement testing certificate.	To introduce pre-movement testing of all cattle over 6 weeks of age in one and two yearly parishes as an essential disease control measure. (See also 1.2 below)	Phase 1 of Pre-Movement Testing (PrMT) was introduced in Wales on 2 May.	Implementation of Phase 1 of the TB (Wales) Order was discussed with stakeholders on 29 th January 2007. Experience drawn from implementation of Phase 1 will be used to implement Phase 2 - the introduction of pre-movement testing for all cattle over 6 weeks of age from 1 and 2 yearly testing herds. Implementation date 1 March 2007.	Reduction in spread of bTB associated with animal movements with a positive impact on overall incidence. Pre-movement testing of cattle has resulted in a minimum of 156 animals being slaughtered.

Rec	Description	Intention	Progress Made	Future Intention	Desired Outcome
1.2	Increase the frequency of cattle testing in clean parishes from every four years to every two years	The Regulatory Assessment carried out on increased testing options identified that PrMT and an increase in the frequency of cattle testing in clean parishes from every four years to every two years are inefficient when implemented simultaneously.	Pre-Movement Testing was implemented rather than an increase in the frequency of cattle testing in clean parishes from every four years to every two years.		
1.3	Introduce the use of the gamma interferon (g-IFN) test for all herds breakdowns to ensure diseased cattle are identified and removed as soon as possible.	Evidence-informed implementation of wider use of g-IFN test in specific situations where it adds value to tuberculin skin testing. Must be compatible with EU Legislation.	On 25 July 2006 the Welsh Assembly Government announced a new policy to improve the testing of cattle by extending the use of g-IFN. This policy was implemented from October 2006 and should result in a threefold increase in the amount of gamma interferon testing.	The Assembly and Defra will closely and continuously monitor the effect of rolling out the g-IFN test.	
Rec	Description	Intention	Progress Made	Future Intention	Desired Outcome
1.4	Ensure that TB99 forms are completed for all herd breakdowns.	To ensure that all relevant information relating to herd breakdowns is collected	The Disease Report Form (DRF) replaced the TB99 form in 2004. SVS are	Data from TB99, CCS2005 and other databases is being	Relevant information relating to herd breakdowns is collected

		and analysed in order to identify important risk factors for cattle infection.	required to complete a DRF for all TB breakdowns. A more detailed Farm Management Questionnaire was applied in all herd breakdowns recruited to the Case Control Study 2005 (CCS2005). Carmarthen AHO participated in the study which was completed in March 2006.	analysed by the ISG to identify risk factors relating to a farm having a bTB breakdown. The results of the ISG's analysis should be published by July 2007. These results will be used to inform bTB control policies in Wales.	and analysed in order to identify risk factors for herd breakdowns. This information is used to optimise disease surveillance & control measures.
1.5	Ensure that the recommendations of the Independent Husbandry Panel are implemented on farms.	The Independent Husbandry Panel's report to the former MAFF published in May 2000, set out guidance to farmers on measures to separate badgers and cattle.	Guidance is provided to farmers to encourage the adoption of these voluntary measures online, in presentations and publications such as <i>Gwiad, TB in Cattle - Reducing the Risks and Dealing with Bovine TB in your herd</i> which are regularly updated. Last update April '06 and October '06 respectively. The introduction of the Biosecurity Intensive Treatment Area is designed to pilot advice to cattle keepers on measures such as those recommended by the Independent Husbandry Panel. This is aimed at	Existing and future research results will continue to be fed into guidance to the industry. The report on the ITA will include an evaluation of the mechanisms used to communicate and monitor biosecurity on farms. This will be used to inform future decisions on our approach to the communication of best practice.	Best practice is identified & clearly communicated to the farming community facilitating improvements in farm biosecurity & a reduced risk of breakdown.

				reducing the risk of bTB transmission. Advice is provided by their local private veterinary surgeon.				
1.6	Collect and test wildlife in Road Traffic Accidents (RTAs) outside hotspot areas.	To extend the collection of badgers found dead in Wales outside hotspot areas. To include those found dead on public highways as well as on land in private ownership.	On 15 December 2005, the Welsh Assembly Government announced a package of measures to control bovine TB in Wales including a survey of badgers found dead. The Badger Found Dead Survey delivered 549 badgers by the 31 May '06 for post-mortem examination (PME) and laboratory testing. Initial results from the survey were presented to EPC Committee on 28 September '06	On 15 December 2005, the Welsh Assembly Government announced a package of measures to control bovine TB in Wales including a survey of badgers found dead. The Badger Found Dead Survey delivered 549 badgers by the 31 May '06 for post-mortem examination (PME) and laboratory testing. Initial results from the survey were presented to EPC Committee on 28 September '06	The final report of the Badger Found Dead Survey is due to be provided to the Wales TB Action Group for their consideration in February and EPC Committee in March.	The proportion & geographical distribution of badgers found dead in Wales that are infected with <i>M. bovis</i> . This information will be used to inform decisions on wildlife interventions.		
Rec	Description	Intention	Progress Made	Future Intention	Desired Outcome			
1.7	Introduce a dedicated TB helpline or TB information packs to ensure help is available for farmers to deal with the stress associated with TB breakdowns and provide advice and guidance on TB control	To ensure help is available for farmers to deal with the stress associated with TB breakdowns and provide advice and guidance on TB control measures.	The SVS booklet 'Dealing with TB in your herd' provides advice to farmers. This booklet is updated on a regular basis in line with policy developments. Last update October '06	To monitor the effectiveness of the TB helpline and other means of providing guidance on TB control measures.	Readily available information, guidance and support on TB control measures.			

	measures.		<p>Every SVS Divisional Office ensures that a Veterinary Officer is on duty seven days a week to provide advice.</p> <p>Following a TB breakdown the SVS work closely with the farmer, offering advice and support where possible.</p>		
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Recommendation 2: That the Welsh Assembly Government establishes an 'Intensive Treatment Area' within a hotspot area in Wales that has experienced prolonged problems with TB, incorporating the points set out in para. 3.12 of this report. This should be funded by the Welsh Assembly Government.

"3.12 An Intensive Treatment Area could involve:

Rec	Description	Intention	Progress Made	Future Intention	Desired Outcome
2.1	Investigating all cattle movements on and off farm associated with a new herd breakdown using and improving the Cattle Movement Tracking System.	The effective forward & backward tracing of animals associated with disease breakdowns identified by animal testing or slaughterhouse examination.	The SVS are required to undertake forward and/or backward tracings from premises where disease is identified Cattle Tracing System is in place and is used to ensure accurate and up to date information is available for surveillance and disease control purposes.. BCMS- incident reports are provided weekly and data can be sought regarding individual cases at any time.		The effective control of disease risk associated with cattle movements.
2.2	Gamma Interferon testing to ensure diseased cattle are identified and removed as soon as possible.	Evidence-informed implementation of wider use of g-IFN test in specific situations where it adds value to tuberculin skin testing. Must be compatible with EU Legislation.	On 25 July 2006 the Welsh Assembly Government announced a new policy to improve the testing of cattle by extending the use of g-IFN. This policy operates on national rather than a geographically restricted basis, to maximise the benefits of its	(See 1.3 above for future intention)	(See 1.3 above for desired outcome)

Rec	Description	Intention	Progress Made	Future Intention	Desired Outcome
2.3	Testing of cattle on all farms in close proximity, e.g. within a 2km radius of a breakdown.	Complete and rapid testing of herds considered to be at high risk due to association with an identified source of infection.	SVS undertakes risk-based testing in herds considered to be at increased risk due to association with a breakdown herd. Includes testing of contiguous herds & tracings. Testing is undertaken in all herds within a 3km radius of a confirmed new breakdown in a 'potential new hotspot'. Introduced in November 2004.	To improve the effectiveness of the implementation of risk-based testing through the monitoring and evaluation of performance targets agreed with the SVS.	To ensure the rapid identification of disease thereby permitting its control.
2.4	If investigations find that the cause of the breakdown is not due to cattle to cattle transfer, an investigation of major species of wildlife known to carry TB should be undertaken within a 2km radius of the breakdown. Wildlife that carry and transmit TB found to show signs of the disease should be removed. A level of prevalence/rate of transmission in wildlife should be agreed.	SVS required to investigate source of every breakdown. Implement additional wildlife surveillance where the relevant criteria for a "potential new hotspot" area are met.	Measures applied in potential new hotspots (see 2.3 above) include the testing of badger & wild deer carcasses from within a 3km radius of a confirmed new breakdown.	Evidence from the Badger Found Dead and Population Surveys is being considered by the Wales TB Action Group in order for them to provide recommendations to the Minister on appropriate actions for wildlife, including the possible introduction of a Wildlife Intensive Treatment Area.	To determine the cause of breakdown, so that appropriate interventions can be applied.

Rec	Description	Intention	Progress Made	Future Intention	Desired Outcome
2.5	Potential infected areas should be cleaned as well as practically possible to reduce the risk of transmission of TB to other wildlife.	To promote advice on best practice for cleansing and disinfecting post breakdown.	As part of any breakdown, SVS serves a BT5 Cleansing and Disinfection Notice. As part of this process, appropriate advice is provided to enable the farmer to comply with the requirements.	To improve the effectiveness of this measure through the monitoring and evaluation of performance targets agreed with the SVS	To ensure that the disease risk to cattle & other species associated with environmental sources of infection are minimised.
2.6	On farm Biosecurity should be improved with the assistance of veterinary officers, Divisional Veterinary Managers, and others.	Work with SVS, private veterinary surgeons and other providers of guidance to assist herd owners in their responsibility to ensure the biosecurity of their herds. To introduce a Biosecurity Intensive treatment Area to evaluate the delivery and application of advice from vets to cattle keepers on measures to reduce the risk of TB transmission.	Guidance is provided by Government, SVS, private veterinary surgeons & others. Compulsory pre-movement testing was introduced in Wales on 2 May 2006 to reduce the potential of spread of TB through cattle movements. The Biosecurity Intensive Treatment Area has been established in South West Wales using local private veterinary practices to provide advice. The responsibility to implement that advice remains with the cattle keepers.	To improve the guidance & its communication as a consequence of the evaluation of the Intensive Treatment Area, and to consider its expansion into an all Wales scheme.	Improve biosecurity on farm to reduce the risk of infection from associated vectors.
2.7	The progress of breakdowns on farms	To ensure that existing surveillance and control	The management of herd breakdowns is a	To improve the effectiveness of the	Disease control measures are applied optimally.

Progress Report on Recommendations of the EPC Inquiry into Bovine TB

Page 8

	should be closely monitored.	procedures are being applied appropriately.	responsibility of the SVS who report information relating to herd breakdowns; overdue tests etc on a monthly basis from the SVS VetNet system. Since the introduction of Pre-Movement Testing the Assembly is also receiving weekly information from SVS relating to PrMT tests and exemptions.	implementation of risk-based testing through the monitoring and evaluation of performance targets agreed with the SVS.	
2.8	Regular reports on the progress of the Intensive Treatment Area should be made to the TB Action Group and the Welsh Assembly Government.	To provide regular progress reports.	Updates on developing issues, emerging science and progress with implementation are provided at every WT BAG meeting.	WTBAG will continue to review progress & provide advice on control interventions including the ITA.	Informed stakeholders and decision makers. WTBAG advice to Minister.

Recommendation 3: That the Welsh Assembly Government incrementally rolls-out intensive treatment to other areas of Wales if, following evaluation, it proves useful in controlling TB. Sharing of costs of funding between the farming industry and the Welsh Assembly Government should be considered.

Rec	Description	Intention	Progress Made	Future Intention	Desired Outcome
N/A	As above.	Optimal application of bTB surveillance & control measures in Wales	A comprehensive evaluation programme has been established for the Biosecurity Intensive Treatment Area.	To use available evidence to revise and/or develop new policies for controlling TB.	Optimal application of bTB surveillance & control measures in Wales

Recommendation 4: That the Welsh Assembly Government establishes a Wales TB Action Group to deliver short-term measures to tackle TB in cattle and to investigate longer-term measures, as outlined in para.3.16 of this report. Membership of the Action Group should be small and made up of those able to implement decisions, but representative of stakeholders. The Wales TB Action group should be accountable to the Minister, but with a specific remit for action. Regular reports should be made to the Minister and publicised to all stakeholders.

*3.16 The remit of the Wales TB Action Group could include:

Rec	Description	Intention	Progress Made	Future Intention	Desired Outcome
4.1	Investigating the establishment of laboratory, testing and research facilities in Wales (e.g. to undertake gamma interferon tests, which must take place within 24 hours of samples being taken).	Liaise with providers of laboratory testing capacity (Veterinary Laboratories Agency, VLA) to ensure appropriate provision in Wales	VLA has confirmed that existing capacity is sufficient for current & projected g-IFN testing demand. Funding provided to Veterinary Laboratories Agency for improvement of laboratory facilities at Aberystwyth to allow the post mortem of badger carcasses.	Requirement for, & provision of, additional laboratory capacity will depend on decisions on increased use of g-IFN test. Management of laboratory testing provision, including location of laboratories provided specific tests, is responsibility of VLA. Assembly will continue to liaise with VLA to ensure appropriate provision of all required testing.	To ensure that sufficient facilities and capacity are available to effectively service Welsh requirements.
4.2	Consider support for farmers such as an increased role for veterinary officers in advising on biosecurity risks.	Wales TB Action Group to provide advice for Ministerial decision.	The Wales TB Action Group recommendation of 11 July, included the suggestion that private veterinary practitioners should be employed to deliver advice in a Biosecurity Intensive Treatment Area. This recommendation was	(See 1.5 and 2.6 above for future intentions)	Improved biosecurity on farm to reduce the risk of infection from associated vectors.

Rec	Description	Intention	Progress Made	Future Intention	Desired Outcome
4.3	Consulting on introducing an industry levy to pay for TB testing and compensation.	Wales TB Action Group to provide advice for Ministerial decision.	Welsh Assembly Government officials and farming unions are participating in the UK Responsibility and Cost Sharing Consultative Forum. Initial proposals are expected to emerge during Summer 2007.	To consider the groups proposals and provide recommendations for Wales.	Costs of TB are distributed appropriately.
4.4	Investigating other longer-term issues, such as the cattle compensation scheme.	Wales TB Action Group to provide advice for Ministerial decision.	A revision to the cattle compensation system using table valuations was rejected at Plenary 23/05/06. Subsequent Wales TB Action Group Meetings have been considering alternatives including an analysis of the current levels of compensation, particularly in higher value animals.	EPC Committee discussed cattle compensation at its meeting on 30/11/06. A revised option for cattle compensation arrangements in Wales will be brought forward by Spring 2007.	A compensation system that provides a fair and appropriate level of compensation, based on the market value of the animals.

Recommendation 5: That longer term and larger scale investigations, such as vaccine development and trials, continue to be undertaken at UK level.

Rec	Description	Intention	Progress Made	Future Intention	Desired Outcome
N/A	As above	To ensure that there is co-ordinated GB wide responsibilities and polices on surveillance, controls and research.	<p>There is scope within GB framework for different approaches to bovine TB which will allow for the delivery of measures specific to Wales.</p> <p>The extended use of the gamma interferon test across Wales and England commenced in October 2006. Following a pilot and consultation with stakeholders, both the Welsh Assembly Government and Defra worked closely together in order to develop the joint policy.</p>	Support from the Wales TB Action Group for the Assembly Government to see UK level research studies undertaken in Wales.	Co-ordinated GB wide polices on surveillance, controls and research which respect devolved responsibilities.