

Rural Development Sub-Committee Inquiry into TB in Wales, 25 July, 2007

CLA-Wales welcomes the opportunity to submit evidence to the sub-committee, and offers the following response in answer to the Terms of Reference.

Annex 1. Recommendations of the EPC Committee.

'Recommendation 1: That the Welsh Assembly Government takes immediate action to tackle Bovine TB in Wales, as outlined in para. 3.8 of this report. Wales' approach to tackling TB should be holistic and pragmatic involving all aspects associated with the spread of the disease. Measures should be developed in partnership with all stakeholder groups and based on current scientific knowledge.'

- Pre-movement testing is in progress.
- Testing frequency, no progress yet.
- IFN-gamma test, not yet implemented.
- TB 99 forms in hand.
- IHP recommendations are in hand.
- RTA kills. The badger-found-dead survey was a way of getting some idea of the extent of infection in the badger population. Not surprisingly it found that a significant proportion of badgers in the worst-affected areas were infected – this probably underestimated actual infection levels because many diseased animals would have died elsewhere and not have been killed on the roads!
- TB helpline, in hand.

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.

- There has been no progress on a wildlife ITA.

Initially it was proposed to set up three ITAs, one for bio-security, one for wildlife, and one for the IFN-gamma test. The last was dropped after the Government decided to carry out wider tests which could have made it redundant. The bio-security ITA was first proposed by the government as a way of focussing on cattle-to-cattle transmission, but after some discussion it was accepted that if it were to be of any value it would have to include all vectors. A decision about the wildlife ITA has still not been made and there is no sign yet of any attempt to develop one.

The most useful thing it has done has been to develop a bio-security scoring tool to evaluate farm-level practices and indicate priorities for improvements. This was done as part of the preparation for

the bio-security ITA, but it has applications beyond the TB problem and might form part of a general livestock farming education programme.

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.

- Rolling out ITA practices, any progress will await ITA results
It discussed compensation arrangements, with government disposition to go for a table-based system as introduced in England despite the manifest inequity of some of the originally-proposed rates. Farming interests pointed out that there were existing powers to challenge payments considered to be unduly high, and if WAG failed to use them that was their problem. In the event the Assembly rejected the proposed changes.

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.

- TBAG exists, though not in the form apparently envisaged.
- Laboratory facilities- little progress made.
Provision of laboratory facilities, especially for IFN-gamma testing was discussed, including the idea of a mobile unit, but there has been little evident progress.
- Vet assistance- e.g. on bio-security. It is being provided in the bio-security ITA.
- Industry levy - there are strong farming reservations.
- Cattle valuation.
It discussed compensation arrangements, with some apparent political disposition to go for a table-based system as has been introduced in England despite the manifest inequity of some of the originally-proposed rates. Farming interests pointed out that there were existing powers to challenge payments considered to be unduly high, and if WAG failed to use them that was their problem. In the event the Assembly threw out the proposed changes.

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

- Vaccines - Vaccine development must be encouraged.
A standing group should be set up to direct and monitor progress. Development of a vaccine- There are still many questions and challenges to be faced, principally of efficacy, length of immunity, effect on non-target species and a lengthy registration and licensing process. A lot of work has and is being done with varying success with BCG and other antigens, particularly ESAT-6, CFP10 and combinations. It is widely agreed that a wildlife vaccine is the prize.

CLA Reactions to ISG

The ISG report is seriously flawed – politically it was restricted by the mandate that “... while the medium term culling strategy in the Republic is to eliminate, or virtually eliminate, badgers from large tracts of the land mass the ISG were directed by Ministers at the onset of the RBCT that

elimination of badgers from large tracts of the countryside was politically unacceptable, and that badger welfare must be taken into account.”

We are disappointed with the conclusions of the ISG report. We feel it leaves farmers (particularly in hotspot areas) in an impossible position with no ability to control the disease.

The CLA believe the report should be subject to a review in light of the political restriction it was forced to operate under.

Proactive culling was shown in the ISG report to reduce TB incidence in cattle in culled areas but it claimed the benefits in culled areas were offset by increased incidence in surrounding areas. CLA would argue the perturbation effect could be reduced by using carbon monoxide gassing rather than the very ineffective trapping which was done in the KREBS trials. Again, the decision to cull badgers by trapping was a political decision not based on scientific reasoning as to the best cull method.

The findings of the ISG do not marry with the evidence of the successful 4 Areas Trial in the Republic of Ireland. Prof Simon More, epidemiologist (UCD) emphasises-tackle all drivers. The disease has never been successfully tackled by only addressing one driver of the disease. Why would it prove any different here?

The CLA do not claim science based insight, but all other experience – e.g. Four Areas Trial in Southern Ireland, the Australian, NZ and USA approach show that by tackling the disease in all vectors – including wildlife, you can control and eventually eliminate the disease, although it may take some time (10 yrs in Australia). There is a wealth of international scientific evidence and experience of control methods, all supporting the paramount importance of an integrated approach –e.g. Eire, Australia, USA, NZ, to protect cattle and SA and Canada to protect wildlife species.

No account was taken within the report of the social, environmental and economic issues associated with TB. A full costing, not just cost of culling needs to be done before a cull can be ruled out on economic grounds.

ISG highlights problems with the tuberculin skin test, particularly in heavily infected areas, where inaccurate diagnosis leads to the maintenance and persistence of the disease. There is international evidence of improving diagnostics, especially the use of IFN-γ (Gamma-interferon) in parallel with the skin test (SCT), particularly for problem herds and atypical cases, in order to speed removal of infection by exposing sub-clinical and latent infection not yet visible as disease. Also the need to acknowledge variability associated with local conditions. A practical difficulty of IFN-γ for farmers is that a much higher percentage of animals may be taken in one go with attendant financial and emotional consequences. (Hence an understandable reluctance of farmers to participate, especially if wildlife reservoirs continue to be ignored).

Tracing needs to be improved. Stickers could be used on cattle passports to identify TB test and indicate when last TB clear test had been.

CLA would support some of the cattle control measures recommended by ISG, some of which had been suggested by CLA some time ago i.e. – annual testing. We would also support the suggestion to minimise herd restrictions so trade can resume quickly. And also, investment is needed to refine diagnostic tests available.

CLA call for a wildlife ITA.

CLA is looking for a commitment from Government to develop a long overdue, comprehensive policy to combat TB in cattle.

There has been approximately a 20% rise in year on year cattle Tb incidence since the cessation of the clean ring strategy in 1986. How is this justifiable and has any assessment been made of re-applying the clean ring strategy which maintained bTB at a comparatively minimal level?

We have welcomed the proposal from the TB Advisory Group for an intensive trial (over 300 sq km) cull using carbon monoxide gassing in a hotspot area, around Holsworthy, North Devon. But we would urge Ministers not to use it as justification of further delay in decision making (it is expected to take 5 years.) Dirk Pfeiffer, Epidemiologist at Royal Veterinary College, London, who comes from NZ, confirmed to the 4th International Conference on *mBovis* in Dublin, that the road to control and eradication is long. *“Any programme has to be kept going and sustained, you cannot give up. The longer it is left the more difficult it becomes, especially once it is in wildlife.”*

Work needs to be done now with the industry, particularly in the context of shared costs and responsibilities. Without a decision on wildlife and a comprehensive cost effective package of controls for bTB control, CLA will not cost share on bTB measures.

CLA is clear that what needs to be tackled is not wildlife numbers or species, or cattle management techniques – it is about fighting a complex, potentially highly dangerous zoonosis - a disease.

We are examining merits of the cattle controls detailed in the report but in newly infected areas, cattle movements can be blamed for 80% of the new disease incursions. In hotspot areas less than 20% can be blamed on cattle movements, the rest is due to the wildlife reservoir. Something must be done about this.

We have grave concerns that if control measures are applied only to cattle and are disproportionate and costly the cattle industry in hotspot areas is likely to collapse altogether.

CLA produced a “Vision for Bovine TB Control and Eradication Strategy in September 2005. In it we called for; immediate action, integrated measures by all parties and on all fronts, tried and tested methods (e.g. Eire, USA, NZ, and Australia and Clean Ring Strategy), persistency of control, a variety of measures (we are not opposed to cattle controls, in fact some ISG recommendations we called for years ago, e.g. annual testing) and the maintenance of fair and proper compensation.

EU policy seeks **eradication** and not simply control of the disease. We are concerned about the legality of the TB free status in GB.

The farming industry is collectively committed to doing everything possible to contain and eradicate Bovine TB and to this end we, along with, NFU, TFA, NBA and others signed the 7 point plan in August 2006.

Whilst there is no silver bullet there is a wealth of empirical scientific research, data and risk management experience already available and accessible worldwide. The increasing role of wildlife as a repository for ‘vectors’, ‘spill-over’ and end hosts is incontrovertible. The extent of host species for *mBovis* is wide ranging. The need to manage and control this is imperative. It is central not only to the control and eradication in domestic species, but also to the conservation of wildlife species, and to counter the growing incidences and dangers of zoonosis worldwide (i.e. TB in Humans, a problem exacerbated where immuno-deficiency prevails: vis. HIV).

To quote Prof Dan Collins, UCD.

“Experience illustrates the adverse effects of compromise on outcomes when the application of fundamental principles of disease control such as sound animal management, removal of known sources of infection, early diagnosis, quarantine, movement control and environmental hygiene are less than enthusiastically promoted and applied. The reality is that where these principles are applied in a sustained manner, the outcome is more likely to be successful. Therein lies the challenge of the risk manager”.