



RSPCA Evidence Submission

Economy, Trade and Rural Affairs Committee: Bovine TB

March 2022

RSPCA Cymru welcomes the opportunity to submit evidence to the Senedd's Economy, Trade and Rural Affairs Committee's enquiry on Bovine TB. This submission focuses on the bTB testing programme, informed purchasing, keepers' purchasing decisions and payments for cattle slaughtered as a result of bTB; and can be read in conjunction with the [RSPCA's consultation response to the Welsh Government concerning its Refreshed TB Eradication Programme](#).

Bovine TB is a devastating disease, but this enquiry comes at a time where we have seen some strong progress in Wales in recent years in tackling the problem, its animal welfare impacts and mitigating its devastating consequences on the agricultural community. The disease is primarily spread between cattle, and RSPCA Cymru therefore commends the Welsh Government's continued lead focus on cattle-based measures to control bTB.

This enquiry follows the Welsh Government commitment to stop any culling of badgers to control the spread of TB in cattle¹. Positively, new proposals as part of the refreshed Bovine TB Eradication Programme are primarily aimed at tightening up existing measures relating to cattle rather than badgers, especially as cattle movements are considered to be the main risk in the transmission of the disease. The RSPCA broadly welcomes this new approach - including exploring the appropriate deployment of cattle testing associated with cattle movements, providing improved communication at point of purchase for cattle keepers to allow better informed decision making and reviewing the current payment systems to provide more incentives for farmers.

The bTB testing programme

We recommend that requirements in Low TB areas are based on a herd's bTB history, so only when moving animals from a herd which has had a bTB breakdown within the last 10 years must pre-movement TB testing (PrMT) be undertaken. This time limit since the last bTB breakdown could be determined by what the data suggests regarding the herd history of animals which have been moved within the low TB area and then subsequently become TB positive. Animals required to do PrMT should be kept in subsequent isolation from the rest of the herd prior to moving off-farm, if not already required to do so. We agree that cattle moving into the Low TB Area from a higher incidence area should also require a PoMT on arrival, if being moved from a herd with recent bTB breakdowns. The longer a herd has been free of bTB the lower the risk of their cattle being undetected carriers and this could be acknowledged again through the Welsh Government prioritising risk-based PoMT.

However, in the absence of the Welsh Government adopting such a risk-based approach, we would instead recommend bringing in PoMT for movements of cattle from higher incidence areas to lower incidence areas only if the data suggests that there are a significant number of cattle passing PrMT and subsequently becoming bTB positive, likely as a result from undetected bTB infection on the farm of origin. We would also point out that if such a requirement was put in place for PoMT then any eligible animals must be kept in strict isolation from the rest of the herd until a clear PoMT is received.

¹ Welsh Government [Programme for Government 2021 to 2026](#), Rural Affairs and North Wales, p15

We recommend that decisions regarding whether cattle moving into the Intermediate TB Areas from higher TB incidence areas should have a PoMT be based on a herd risk basis, and only used as a blanket measure if data suggests a significant number of breakdowns are coming from animals undetected on PrMT which were likely to have contracted the bTB in the herd of origin. As Wales gets increasingly in control of bTB and understands the sources of infection within the national herd, we hope that interventions will be targeted so that many farmers who have been clear of bTB for many years and work hard to sustain such clearance can be rewarded for their efforts.

The Welsh Government is currently exploring the temporary introduction of PoMT of cattle originating from an identified TB Hotspot, or high risk herds. Based upon what such a policy would look like (e.g. how a hot-spot or high risk herd would be defined, how long such measures would last, what additional tests would be being used in hot-spot areas or on high risk herds to help remove infected cattle prior to movement etc) we would recommend this move, and would see it as a move towards a dynamic, quick-acting bTB control policy which is not blanket for all herds, but identifying those at risk and therefore ensuring the most effort is put in to detecting the disease where it is most likely to be.

Considering such hot-spots and high risk herds can have wide-reaching dispersal and thus potential seeding of bTB, we would suggest it is likely to be impactful in all areas. What constitutes a “hot spot” might be different in different TB areas but where a particular area or herd poses a significant risk relative to those around it, it seems reasonable for steps to be taken to mitigate that risk.

As it stands, it is not clear what the financial envelope is around any additional costs for blood testing testing (gamma or IDEXX) if this is deployed as a PrMT, and why these could not be met by the Welsh Government; or whether these additional costs arise from the additional testing cost or the resultant additional compensation payments resulting from an anticipated rise in positive tests. Notwithstanding this we would recommend that at this stage, government maintained control over which tests are used as a PrMT if it is felt (as the RSPCA believes) that the skin test at standard interpretation is not sensitive enough and that the additional cost for this needs to be seen as an investment for long term bTB control.

We have long campaigned that the current skin test is not adequate to be used at an individual animal level and only gives an accurate indication of whether a herd is infected. We would highly recommend moving to a more appropriate test for individual animals with a higher sensitivity since the implications of moving an undetected, infected animal into a currently uninfected herd is significant. We appreciate false positives will have repercussions for those farms which suffer a breakdown as a result, and will have some repercussions for the Welsh Government, too, in terms of allocating resources to identify whether there is further infection in the herd, so specificity is not to be disregarded. We would recommend that there should be clear plans for situations where a false positive is suspected, particularly where such a positive is found on a farm with a long history of being bTB clear.

Should the Government go down the route of passing on additional testing costs, there will need to be clearly communicated protocols regarding what the Welsh Government will cover in the event of a positive being found at PrMT using a lower specificity test, including compensation, further testing of the herd, and what tests must be used in the herd. Indeed, we would welcome clarity from the Welsh Government as to what is meant by *“additional cost to testing, which could not be met by Government”*² - and, in such a situation, its contingency proposals to ensure costs associated with testing can be sufficiently met.

We consider the following approach, which has previously been suggested by the Welsh Government, to be an essential change - ‘in an unrestricted herd, an animal is not allowed to move between TT1 and TT2 of the skin test, or between a blood test and receipt of results, with the exception of: i. Any clear

² <https://gov.wales/sites/default/files/consultations/2021-11/refreshed-tb-consultation-document.pdf>

testing animal direct to slaughter, or a slaughter gathering under licence; ii. Any animal licenced by the Animal and Plant Health Agency (APHA).’

The Welsh Government has also proposed to expand the TB (Wales) Order 2010 to include sampling and testing on samples taken to ensure authority is sought from the Welsh Government to collect a sample, perform a test, perform a test on any sample and to ensure results from such tests are immediately reported. In principle we do agree with this proposal, however we would urge the Welsh Government to work with vets (and any others that might be taking and testing such samples) to ensure the process by which this permission is sought is simple, avoids bureaucracy and does not stand in the way of proactive producers and their vets doing additional bTB testing on their farm to identify high risk animals which they may then choose to manage differently and cull out of the herd at an opportune time with minimal cost and disruption implications to the producer.

Informed purchasing and keepers’ purchasing decisions

With regard to informed purchasing, the Welsh Government has proposed adding a new map to ibTB showing the number of years unrestricted cattle herds have been Officially TB Free (OTF) along with mandate provision and display of TB information at point of sale. Regarding the inclusion of numbers of years a herd has been free of bTB on ibTB we feel this data is readily available and therefore it should be incorporated to ensure potential buyers have as much data available to them as possible, and can make an informed choice. Regarding the proposal mandating information display at the point of sale, we would strongly recommend this too. We believe the information proposed by Welsh Government would be suitable, but Welsh Ministers may also consider encouraging information be displayed concerning whether the herd is doing any additional testing, and if so what, and the date of the last of such tests; in addition to whether animals have been acquired from higher-risk herds and the last time such animals were introduced to the herd.

While we recognise the significant business disruption of a bTB breakdown, especially if several animals in the herd have to be culled, and that sometimes they need replacing quickly, we believe that there should be implications for cattle keepers who fail to take notice of TB information and make a purchase regardless of highlighted risks. We believe it is in the long term interests of all that higher risk (and likely lower cost animals) are not purchased without effective steps being taken to mitigate the risk. Previous enforcement action taken on farmers in Wales for mis-representing cattle status or test information clearly shows there are some farmers willing to risk the bTB free status of cattle in Wales. Only strong enforcement action and clear implications of ignoring TB information can ensure that all cattle keepers follow the rules and so ensure the Wales cattle herd moves towards a bTB free status.

Proposed impacts on cattle keepers who fail to take notice of TB information may only need to be seen if additional measures are not taken when buying in higher risk cattle. These might be higher sensitivity but lower specificity PrMT and/or PoMT and stringent biosecurity measures to keep bought in animals from higher risk herds separate until the producer can be more confident they are truly clear of bTB. This sort of proposal would ensure that those trying to sell higher risk cattle still have a fairly open market, so long as reasonable, effective steps are taken to fully manage the risk their cattle pose to other herds.

Payments for cattle slaughtered as a result of bTB

The Welsh Government has made three proposals with regard to Bovine TB payments, including table valuations with an increase to payment based on membership of an approved animal health accreditation scheme, payments to be determined by an industry-led independent group and an industry levy that would partly fund TB payment costs.

All three seem to be reasonable proposals, the first being the easiest and quickest to establish. The second and third would take longer to establish; the third would require setting up an external group

while the second would only be viable once enough certification bodies were available, these had been assessed as for their quality of bTB accreditation scheme and assessed as to how well they ensure compliance of those who are signed up to their scheme. Although the drawbacks of the first option include increased costs to pedigree herds who end up having to cull cattle for bTB control, such implications may give additional incentivisation to such herd owners to do all possible to maintain bTB free status.

The third option, however, is appealing in its manner of allowing industry to set its own rules and guidance within certain thresholds which must be followed. This was also recommended by Sir Charles Godfray in 2018³ and appears to have had some success in New Zealand. If such groups could be created and used to determine local control policy, strategy and delivery, including compensation payments and incentives to engage, it could be a way of giving farmers more control and encouraging communities to hold their own to account. We have stated in the past that we believe such a system would help increase compliance with industry recommended best practice and would help engage those who may be dismissive or fatalist when their neighbours and colleagues are involved in the setting of such standards. Nevertheless, if this is not favoured, we believe the second option would be a good balance between providing industry with a choice of schemes to be members of, whilst having overview of accreditation of schemes to ensure overall equality between what is expected and asked of producers.

Regardless as to which of the three avenues is eventually pursued by the Welsh Government, the presence of a robust plan, and compliance with the components of the plan, should be a precondition to receiving the benefits of state funded compensation should disease occur.

³ Professor Sir Charles Godfray et al - Bovine TB Strategy Review, Report to Defra / Rt Hon Michael Gove MP, Secretary of State, October 2018