

NFU Cymru Consultation Response

NFU Cymru response to the Economy, Trade and Rural Affairs Committee inquiry into Bovine TB

1. NFU Cymru welcomes the opportunity to respond to the Economy, Trade and Rural Affairs Committee inquiry into Bovine TB.
2. NFU Cymru champions Welsh farming and represents farmers throughout Wales and across all sectors. NFU Cymru's vision is for a productive, profitable and progressive farming sector producing world renowned climate-friendly food in an environment and landscape that provides habitats for our nature to thrive. Welsh food and farming delivering economic, environmental, cultural and social benefits for all the people of Wales whilst meeting our ambition for net zero agriculture by 2040.
3. The importance of the farming industry in rural Wales cannot be over-stated. Welsh farming businesses are the backbone of the Welsh rural economy, the axis around which rural communities turn. The raw ingredients that we produce are the cornerstone of the multi billion pound Welsh food and drink industry which is Wales' largest employer employing over 239,000 people.
4. Welsh farmers also play a key role maintaining and enhancing our natural environment – Wales' key asset. Farming activity supports a diverse range of species, habitats and ecosystems, provides a range of ecosystem services including flood alleviation, carbon sequestration, climate change mitigation; and delivers the significant backdrop for Wales' tourism and recreation sector worth an estimated £2.5bn annually.
5. In line with this inquiry our response will focus on the consultation Welsh Government recently concluded on "A Refreshed TB Eradication Programme" and within this the four areas identified by the committee of: the bTB testing programme, informed purchasing, keepers' purchasing decisions and payments for cattle slaughtered as a result of bTB. Our [submission](#) to Welsh Government was wide ranging and covered topics beyond these four, we would be happy to share our views on additional areas as required by the committee.

Summary

6. Bovine TB continues to cast a dark shadow across the cattle industry in Wales and is one of the main threats to achieving our vision of a productive, progressive and profitable Welsh agricultural industry. Between the end of December 2020 and 2021, 10,641 animals were slaughtered in Wales as result of Bovine TB, an increase of 1% on the previous year. Shockingly between 2010 and 2020 inclusive over 100,000 animals have been slaughtered in Wales because of Bovine TB.
7. There is no doubt that the anger and frustration within the industry at the repeated failure of successive Governments to implement a comprehensive TB eradication strategy in Wales is as great as it has ever been. This has been further compounded by the Welsh Government 2021 Programme for Government that in relation to Bovine TB has stated that it will "Forbid the culling of badgers to control the spread of TB in cattle". Bovine TB is a complex disease that requires a comprehensive multi-faceted approach to control and eradicate the disease from Wales. In this respect, we believe that disease should be tackled wherever it exists – whether that be in cattle or the wildlife. However, Welsh Government appears to be unique in

its thinking that this disease can be eradicated without proactively dealing with diseased animals in both populations.

8. We believe it was wholly irresponsible of Welsh Government to propose changes to the compensation scheme at the same time as proposing broad scale changes to the testing regime. We agree on the importance of fine-tuning TB testing protocols to consider the latest available evidence and data. However, if Welsh Government move forward and change the current compensation arrangements, it will immediately remove any goodwill from industry to engage in discussions over the use of more sensitive tests.
9. Welsh Government has proposed a number of changes to pre and post movement testing. NFU Cymru believes that a full cost benefit analysis, including the likely number of bTB reactors identified, should be undertaken. The findings of this work which should be undertaken in conjunction with stakeholders and should be shared with industry prior to any decision being made.
10. NFU Cymru supports proposals that give potential purchasers of animals as much information as possible about the animals they are considering purchasing. However, it is important that any system adopted strikes the right balance between providing the necessary information without becoming overly complicated or potentially misinterpreted. We are concerned that the introduction of informed purchasing could facilitate the establishment of a two-tier market which would significantly impact some businesses, often those who are unable to improve their disease status due to their inability to control the reservoir of infection within the wildlife. Informed purchasing will only work with a reliable up to date easy to access database. We believe a working group should be established to consider the role that EID Cymru could play in supporting proposals related to TB control and eradication.
11. NFU Cymru categorically rejects any move to a tabular valuation system. In line with the Welsh Governments' own view, we believe that a TB payment system should provide fair and proportionate TB payments to farmers. The only way to achieve this is through valuation of cattle based on their individual merits, through the maintenance of the current TB compensation arrangements. Welsh Government continually highlight the need for individual farming business to increase their resilience, the need to improve productivity, business performance and the use of better performing genetic stock. However, a tabular valuation system will penalise the very farming businesses that Welsh Government is purporting to champion.
12. Finally, we must remember that behind every statistic is a farming family dealing with the emotional and financial trauma of Bovine TB on their farm. It is incumbent on all those who are involved in making decisions on Bovine TB that they fully understand the impact that this disease has on the mental health and wellbeing of farmers, vets and all those involved in supporting farming families with a bovine TB incident on farm.

NFU Cymru TB Focus Group

13. Following a discussion on the continued impact of Bovine TB on Welsh farming families at NFU Cymru Council on the 26th May 2021, the NFU Cymru President requested that a NFU Cymru TB Focus Group be set up with immediate effect. The group, made up of members from across Wales with expertise in the area of Bovine TB were tasked with providing advice, guidance, and recommendations to the NFU Cymru President on NFU Cymru Bovine TB Policy.
14. The group have now met on a number of occasions and have taken advice from policy, technical, legal, and veterinary experts. The Group have now issued a set of draft recommendations to stimulate discussion covering topics discussed in meetings to date. The Group recognise that there are a number of key areas which they have not yet had the

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opportunity to consider. The Group also highlight that a number of the recommendations should be considered as 'work in progress'.

15. The group made a conscious decision not to focus on recommendations in relation to wildlife within their initial work programme. The views of NFU Cymru are well known on this matter and the Group fully support the position of NFU Cymru in calling for a comprehensive TB eradication programme in Wales that actively tackles the reservoir of disease in both Cattle and Wildlife Populations.
16. The full report can be read as an appendix to this inquiry response, below is a summary of the key recommendations to date:
 - a. A thorough review and analysis of the current bovine TB testing protocols (including cost benefit analysis) should be undertaken. A technical advisory group that includes members of the farming and veterinary profession should consider options going forward in more detail.
 - b. The group recommend more flexibility with regards to the testing regime for herds whilst under restriction, particularly for long term breakdowns.
 - c. The Group recommend the use of trained lay testers to carry out both the SICTT and blood tests. Veterinary resource should be focussed on supporting the farmer with managing the breakdown and devising a strategy to ensure that the herd becomes clear in the shortest possible time.
 - d. WG/APHA should provide keepers with the option of receiving individual test chart results for every animal at each test. With this information there are opportunities for farmers to work with their vet on risk management. Welsh Government should consider an incentive payment to remove IRs and other animals identified as 'at risk'.
 - e. The use of novel tests is likely to identify diseased or at-risk animals earlier. This inevitably means that potentially more animals will be taken for slaughter and more herds may be placed under restriction. Whilst this may be beneficial for disease control the implications of the loss of many productive animals at the same time will have on the business should not be underestimated and the group believe that this matter requires further consideration as to how farming businesses can be supported and to have viable trading outlets whilst under restriction.
 - f. The Group see improved communications as a vital issue where there is scope for a great deal of improvement. Tailored communication strategies need to be designed e.g., for those who come under restrictions for the first time; for those that find themselves in long term herd breakdown situations and for areas of Wales where Bovine TB has not been a common issue historically.
 - g. The amount and complexity of paperwork needs to be urgently addressed by APHA/WG. The Group recommend the setting up of a working group involving members of the Focus Group and APHA / WG to look carefully at all communications between APHA and Farmers.
 - h. The Group recommend the setting up a password protected portal where cattle keepers could access in date order the letters that have been sent to them by Government.
 - i. There is a need to urgently consider how a farming business under restriction can receive timely responses to queries / licence requests from their Case vet / APHA.
 - j. The group recommend the farmers own vet be far more involved in the management of a TB Breakdown.
 - k. The Group believe there are opportunities for groups of farmers in a defined area e.g. parish or sub county level, working in partnership with local vets, APHA / WG and research bodies on an action plan for an area to better understand the disease picture, the drivers behind disease spread and a co-ordinated plan to consider how the disease could be tackled.

- l. The Group believe that APHA / WG should instigate a dedicated helpline that would provide a central point of contact for farmers in Wales to be able to seek advice and guidance on TB rules.
- m. The group recommend that Welsh Government through future capital grant schemes includes items that support good biosecurity and in particular enable effective separation of cattle and wildlife to be supported. Intervention rates should be set at 70-80%.
- n. Informed Purchasing has a role in future TB control but will need careful thought and a recognition that it could result in a two-tier market with a severe impact on some businesses. Informed purchasing will only work with a reliable up to date easy to access database.
- o. The Group emphasise the importance of both approved finishing units and orange markets as an avenue of sale for those farms who find themselves under restrictions of movement due to TB. The Group recognise that there is further work needed to investigate the barriers to the establishment of further AFUs in Wales.
- p. Welsh Government should undertake a risk assessment to investigate the possibility of raising the 42-day rule to 90 days without the need for testing. There is also the issue of timeliness with regards to the issuing of movement licenses meaning farmers missing slots to get cattle into AFU's. Consideration should be given to a general license being issued where a breakdown herd has a contract with an approved finishing unit.

The bTB testing programme

17. It is important to regularly review the TB testing protocols in light of the latest available evidence and data. However, prior to taking forward any of the proposals on testing we believe that it is incumbent on Welsh Government to undertake a thorough impact assessment of each proposed measure considering the impacts and consequences that the changes proposed could have on cattle keepers. The assessment should also consider the capacity of the veterinary profession to deal with the increase, both in the number and range of tests proposed and the estimated additional costs that would be borne by cattle keepers in Wales because of the additional testing. This work needs to be undertaken using the expertise of stakeholders and there should then be an opportunity for industry to further consider this area once this assessment has been completed.
18. NFU Cymru notes that one of the key drivers for change to the compensation arrangements is that *"the efforts to improve the sensitivity of the testing across the board will likely result in more animals being slaughtered..."*. Our views on changes to compensation are set out later in this response but we must highlight that if Welsh Government more forward and change the current compensation arrangements, it will immediately remove any goodwill from industry to engage in discussions over the use of more sensitive tests. If the sensitivity of the test is increased, then the specificity of it will be reduced i.e. the chance of false positives increases. Under this scenario, more animals would be compulsory removed (slaughtered) by Welsh Government with a larger proportion of these being false positives and farmers would not receive either fair or true compensation. We believe this is a wholly unacceptable scenario and if Welsh Government wants a meaningful review of testing arrangements, it must resist from making any changes to current compensation arrangements.
19. **Pre movement testing (PrMT)** - the majority opinion was that our members would support the re-introduction of PrMT in the Low TB area if it would help to reduce the chance of transmission. Whilst it will place additional costs on farmers, most members felt it would provide additional reassurance and a safeguard ensuring that animals being moved from herds in the Low TB area had tested negative prior to the move.
20. Members from across all TB areas of Wales unanimously rejected the proposal that a herd clearing test should not be allowed as a PrMT, as is the case in persistent breakdowns. This

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proposal would in effect keep a herd under restriction for a further 60 days beyond the two clear tests necessary. Thus, placing significant additional pressure on cashflow/ housing/ animal welfare on farms that have already had to deal with the pressures of TB restrictions on their business.

21. **Post movement testing (PoMT)** - The subject of PoMT (post movement testing) was more divisive in our membership, with some appreciating the belt and braces approach of Pre and Post movement testing to further reduce the risk of disease, whilst others felt it posed an unnecessary cost, added complications and questioned the overall value of PoMT.
22. Farmers purchasing cattle are concerned about the additional costs and complications around compulsory post movement testing and ensuring that animals are tested at the correct time given that batches of animals purchased may all have different dates of pre – movement testing. In turn, farmers selling cattle in the High TB area expressed concern that a requirement to post movement test animals that move into an intermediate or low risk area (and farmers selling from an Intermediate to the Low area) will create a “two tier” market, which will have a clear impact on trade and their ability to realise a fair price for their cattle. Many members who finish cattle (i.e. sell animals deadweight to the abattoir) felt the additional cost and bureaucracy could put their businesses at risk, a concern not just for the finishing units at stake but also the suckler herds who supply them.
23. In relation to the Welsh Government proposal to introduce a farmer paid PoMT for cattle movements from an identified TB Hotspot, or an identified high-risk dispersal we would like to understand more as to how Welsh Government would define or decide when these situations would be declared. This change would have a major impact on the dispersal sale, likewise for all farmers in a designated TB hotspot, regardless of a particular herd’s TB status and history. Classifying the dispersal as ‘High Risk’ could have major implications on the number of potential buyers prepared to attend the sale and the value realised for such stock. Clearly defined parameters must be set out and published so that farmers, their advisers, Vets and APHA are all clear of the decision-making process for defining a high-risk herd dispersal.
24. NFU Cymru believes that a full cost benefit analysis, including the likely number of bTB reactors identified, should be undertaken for the proposals on PoMT. The findings of this work which should be undertaken in conjunction with stakeholders, should be shared with industry prior to any decision being made. We also recommend that a working group be established to consider the opportunity that EID Cymru may provide to facilitate such proposals, alongside other areas such as Informed Purchasing.
25. **Alternatives with regards which test(s) can be used for PrMT and PoMT** – this is a challenging area and one where achieving a balanced approach is key. Whilst there are clear advantages to increasing the level of sensitivity of the testing regime for PrMT and PoMT, it must also be acknowledged that this will reduce the specificity which will result in an increase in false positives. This can create significant difficulties, for example if a herd which is classed as TB free receives a ‘false positive’ there may be a requirement to test the whole herd and the farm may be placed under TB restrictions. The time that elapses whilst it is proved that the result of the test was because of a ‘false positive’ as opposed to exposure to genuine disease can be significant, all the while the farm is forced to operate under TB restriction. There are also many farms who require a pre movement test for moving animals within the business or to bring animals back from tack / rearing accommodation. A ‘false positive’ could mean an animal (or group of animals), for example a dairy heifer at the point of calving, is stuck away from home for a prolonged period of time. In both these examples there are clear financial and animal welfare implications.
26. We have concerns about the use of blood tests for pre or post movement testing. The experience of some farmers who have used blood tests has been poor e.g. gamma blood

samples not stored correctly between sampling and testing and the tests being void/rejected and having to be re-sampled / re-tested. We therefore have concerns about where the liability lies for the costs of resampling / re-testing, the timeliness of receiving results and the impact that delays in receiving results or the need for resampling could have on the ability of farmers to move animals / trade.

27. A change of this magnitude requires extremely careful consideration, a review of the science and evidence, a consideration of all the tests available (including the use of the current skin test under severe interpretation), how they operate (e.g. some are not standalone tests), the value of the current PrMT working in conjunction with PoMT (i.e. if your PrMT is effective should there be a need for PoMT) alongside a comprehensive cost benefit analysis.

Informed purchasing

28. Informed purchasing is a topic that NFU Cymru has considered in some detail through our TB Focus Group. In principle NFU Cymru supports proposals that give potential purchasers of animals as much information as possible about the animals they are considering purchasing. It is important that any system adopted strikes the right balance between providing the necessary information without becoming overly complicated or potentially misinterpreted.
29. At this stage, due to the challenges that some market operators face often outside of their control, we do not support the mandating of this information at present. However, we have previously expressed support for funding for market operators to upgrade facilities to provide information on the TB status of the animal at the point of sale and would support further initiatives in this area.
30. NFU Cymru members have raised concerns that this could facilitate the establishment of a two-tier market for both dairy and beef cattle with a severe impact on some businesses. Businesses that are often constrained from improving their disease status because of a government policy that allows for a reservoir of infection to remain within the wildlife population on their farm.
31. We believe that informed purchasing will only work with a reliable up to date easy to access database. To make any progress in this area, WG must wait until the multi species database, EID Cymru, is in use for cattle so that disease status of both individual animals and whole herds can be easily and accurately recorded and viewed. We believe a working group should be established to consider the role that EID Cymru could play in supporting proposals related to Informed Purchasing. This working group could also consider the role that EID Cymru could play in TB control and eradication more generally, as well as other diseases such as BVD.
32. In relation to ibTB NFU Cymru would, in principle, support exploring the possibility of adding a new map to ibTB to show the number of years currently unrestricted herds have been officially TB free. However, we would highlight the importance of ensuring the accuracy of information on ibTB both in terms of the data added to the map, the location of the breakdown, and the timeliness of data entry, given that the use of information could inform purchasing decisions of cattle keepers. We would also seek confirmation from Welsh Government that they have fully considered GDPR regulations. In this respect, we suggest it only be available via a password protected portal, making use of Government Gateway and RPW Online, to ensure it is only available to the people who have an interest in using it for the designed purpose.

Keepers' purchasing decisions

33. We have already expressed concerns at the possibility that the Welsh Government proposals could create bring a two – tier market for cattle. Many of the farmers impacted by this feel largely helpless, as they are unable to improve the disease status of their herd primarily because of the failure of Welsh Government to consider measures that actively remove the reservoir of infection in Wildlife in endemic areas of Wales. NFU Cymru note that other countries, who have adopted Informed Purchasing also have an effective strategy to tackle the disease in Wildlife. For this reason, without an effective wildlife policy in place NFU Cymru categorically rejects any measures that would penalise farmers because of their purchasing decisions.

Payments for cattle slaughtered as a result of Bovine TB

34. NFU Cymru supports the Welsh Government view that a TB payment system should provide fair and proportionate TB payments to cattle keepers. We believe that the only way to achieve this fairness, is through the valuation of cattle based on their individual merits achieved through the maintenance of the current TB compensation arrangements.
35. We respect that any compensation system must reflect the financial resources available to fund TB payments. The only route to achieving this aim should be to control the disease quickly and effectively ensuring it has the smallest possible impact on the national herd, as opposed to changing the compensation system. The fewer animals that need to be slaughtered because of bovine TB the lower the compensation bill and the lower the cost for both Government and industry. This can only be achieved through a comprehensive TB eradication strategy that tackles the disease in both cattle and wildlife populations. We would reiterate that the compensation paid to farmers for the loss of their animals does not cover the significant consequential losses associated with a TB breakdown on farm.
36. Welsh cattle keepers are doing their utmost to keep TB out of their herds, they adhere to arguably the most stringent cattle movement and testing controls in the world. Stringent cross compliance controls, veterinary improvement notices and reductions in compensation payments are already in place to penalise any keeper who does not adhere to TB controls. Our members are deeply hurt by the inference by Welsh Government within their consultation document that there is little obvious financial incentive for farmers to proactively manage a TB breakdown on their farm. This shows a complete lack of appreciation by Welsh Government for the impact that Bovine TB has on all aspects of everyday life on a farm suffering a breakdown.
37. DEFRA has published a [report](#) in June 2020 which highlights the financial impact of bovine TB on beef and dairy farms in England and Wales. The report shows the cost of a TB breakdown directly borne by cattle farms varies significantly, with a median value of around £6,600 across all farms in the survey. In England and Wales, median costs for herds of more than 300 cattle are around £18,600 whilst those for herds of up to 50 cattle are around £1,700. Median costs for chronic breakdowns over nine month's duration are around £16,000. To put this figure in context the average farm business income in Wales in 2019-20 was £26,200.
38. NFU Cymru fundamentally opposes any system based on Table valuations for TB compensation, believing such a proposal has a number of significant shortcomings. A tabular valuation system is not fair to the farmer or to Government, because a system based on averages is likely to create as many instances of over valuation as under valuation. A table valuation as per the English system takes no account of many important factors, for example:
- a. The individual characteristics of the animal e.g. size, weight, confirmation, legs and feet, calving history, stage of gestation, milk yield.

- b. Seasonal factors e.g. prices will vary depending on short term supply and demand factors.
 - c. Bloodlines/ genetic merit
 - d. Conventional or Organic status
 - e. Animal health history / vaccinations received etc.
39. A tabular system does not cater for the differences between the best quality and second and third quality animals. It is widely accepted within the livestock industry that the best animals are retained for further breeding, the next best are sold for a premium price either deadweight or through specialist store / calf sales and the third draw are sold through the general ring. For breeding stock, the relatively low number of animals in many categories that are traded does not provide enough information to give certainty to the value of animals that need to be compulsorily slaughtered and takes no account of the fact that the very best stock are very rarely traded. Tabular valuations also provide no recognition of the highest quality stock which may not be traded but from which embryos or semen may be collected and sold.
40. A tabular system will inherently reward the farmer who is lagging behind the bulk of the industry by providing a valuation in excess of the value of the animal to be taken. This same system penalises a farmer who is working hard and investing in livestock by paying less than the value of the animals. On the one hand Government are encouraging farmers to increase the genetic potential and productivity of their livestock with an agenda of driving efficiencies and increasing resilience but at the same time they propose to introduce a tabular valuation system that fails to support farmers who make this investment in their businesses. We believe that this is contradictory in Welsh Government policy terms. In fact, these proposals may well act as a disincentive to improve herd genetics, particularly in high incidence areas of Wales
41. One option put forward by Welsh Government is that Table valuations would be implemented with an increase to payment based on membership of an approved animal health accreditation scheme. We remain of the view that any system that has at its core a Tabular based valuation system is not a fair or proportionate payment system for cattle keepers suffering from a bovine TB breakdown. Whilst we believe that the role of animal health accreditation schemes needs to be actively considered in the context of a comprehensive bovine TB eradication strategy, we believe that seeking to tie the use of such schemes to a policy change that has been unanimously rejected by farmers could do significant reputational damage to the credibility of such schemes.
42. Welsh Government propose that an option may be an industry led independent group alongside an industry levy to partly fund TB payment costs. Welsh Government suggest that this would see TB payment managed in a similar way to New Zealand. However, Welsh Government has inferred that the parameters in Wales would not be the same as is allowed in New Zealand. We have significant knowledge of how the scheme in New Zealand works thanks to regular exchanges with our New Zealand counterparts and their government. In New Zealand, the government operates an outcome-based approach to policy goals with the introduction of regulation being introduced as a last resort. With respect to Bovine TB, New Zealand has a comprehensive approach to eradication with wildlife control a fundamental part of this strategy. Farmers in New Zealand therefore feel that they have a genuine opportunity to control and eradicate the disease from their herds and the countryside. Clearly, this is not the case in Wales. Welsh farmers would not be prepared to consider a levy when they continue to have very little control over the TB strategy in Wales, an extremely high and increasing regulatory baseline and a government that has categorically ruled out any opportunity to actively deal with the reservoir of diseased wildlife in Wales.
43. NFU Cymru believes that WG could be far more business orientated in seeking to realise a realistic salvage value for animals compulsorily slaughtered because of bovine TB. We would question whether WG currently has the right expertise to be able to ensure that abattoirs are

providing a fair value for animals and whether the costs that abattoirs charge WG are in line with the going rates. NFU Cymru would also question as to whether the required expertise is currently within OCVO / AHPA to ensure that costs of haulage and processing animals are charged at commercial rates and what efforts are made to ensure that animals are slaughtered in approved abattoirs that are most appropriate for the class of animal being slaughtered. NFU Cymru would suggest that WG needs to consider how it can ensure it is getting a fair and realistic salvage value and that sufficient due diligence is undertaken for procurement contracts.

44. In conclusion, Welsh Government continually highlight the need for individual farming business to increase their resilience, the need to improve productivity, business performance and the use of better performing genetic stock. Moving forward with a tabular valuation system will penalise the very farming businesses that Welsh Government is purporting to champion. This proposal in NFU Cymru's view, is nothing but an ill-conceived attempt to limit the Welsh Government's disease compensation liabilities. In our view taking decisive action to remove the disease from the wildlife population would deliver significantly more savings due to a much quicker reduction in disease levels and therefore overall compensation levels.

Other Issues

45. Improvements in communication between Government and industry in relation to Bovine TB are essential. Improving the relationship between Welsh Government, APHA, the Private Vet and the Farmer is key to eradicating this disease.
46. All too often we hear of instances where farmers are struggling to get hold of their case vet, of difficulty in understanding the vast array of letters and licences they receive and of not knowing what will happen next in relation to their TB breakdown. It is crucial that farmers feel fully engaged with the management of the TB incident on their farm, that communication is clear, consistent, and delivered in a way that they can understand. Farming families need a point of contact who they can speak with and who will respond in a timely and efficient manner to help clarify and resolve any issues or queries that they may have.
47. The Welsh Government consultation does not include a Regulatory Impact Assessment. We have expressed our disappointment that WG has yet to attempt, through the consultation or through the publication of a RIA, to set out the costs and impacts of the proposals on businesses and regions of Wales. It is vital that a full and comprehensive RIA alongside the science and evidence base underpinning all the proposals that will impact on farming businesses is completed.
48. It is vitally important when considering the impact of Bovine TB on farm and on rural Wales we consider the impact on the mental health and well-being of farmers, vets and all those involved in supporting families with a bovine TB incident on farm. It is so important that in terms of policy decisions a strategy is implemented that gives farming families a genuine hope that they can rid the disease from their farm once and for all.
49. In the course of our consultation meetings, we have become aware of farmers who feel trapped, unable to leave the industry because they cannot get clear of Bovine TB, it was felt that consideration needs to be given to a fair and equitable exit scheme/strategy for these farmers to help resolve a situation that will be impacting on their health and wellbeing.

Conclusion

50. NFU Cymru members remain deeply frustrated that the ability to tackle and get on top of this disease has, for so many years, been hampered by the fact that Welsh Government policy measures see politics, all too often, override the science. Welsh Government appears to be unique in its thinking that this disease can be eradicated without proactively dealing with

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diseased animals in both cattle and wildlife populations. Bovine TB continues to be one of the biggest challenges to the industry realising its ambitions in relation to productivity and profitability. It can have a significant impact on the mental health and wellbeing of farming families, vets and all those who work in the sector. NFU Cymru will continue to work tirelessly for a comprehensive TB eradication strategy for Wales, a strategy to give hope that we can rid this disease from our countryside once and for all.

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NFU Cymru TB Focus Group Initial Report and Recommendations

Background

Following a discussion on the continued impact of Bovine TB on Welsh farming families at NFU Cymru Council on the 26th May 2021, the NFU Cymru President requested that a NFU Cymru TB Focus Group be set up with immediate effect. The President asked Roger Lewis, Pembrokeshire NFU Cymru County Chair to Chair the Group.

NFU Cymru Bovine TB Focus Group – Terms of Reference

Bovine TB and its eradication remains one of NFU Cymru key policy priorities. Its eradication will help us achieve our vision of a productive, profitable and progressive farming sector.

Bovine TB is a complex disease and requires a comprehensive and holistic approach to deliver an effective eradication programme.

Bovine TB is a notifiable disease on account of the fact that all mammalian species, including humans are susceptible to bovine TB.

Aim

To provide advice, guidance, and recommendations to the NFU Cymru President / Deputy President and NFU Cymru Council on NFU Cymru Bovine TB Policy

Actions

The Group will take advice from policy, technical, legal, and veterinary experts both within NFU Cymru / NFU and from outside organisations.

The Group will consider the NFU Cymru lobbying priorities with regards to Bovine TB taking consideration of the following factors: -

- The overriding goal and importance of eradicating Bovine TB from Wales
- The Political Landscape in Wales and current WG Bovine TB Eradication Programme.
- The wider UK political landscape with focus on England's eradication programme
- Eradication strategy and lessons learnt from other countries.
- Consideration of the health and wellbeing of farming families impacted by Bovine TB.
- The importance of maintaining viable farming enterprises for herds impacted by Bovine TB

Membership

Members of the group will be selected for their expertise on matters relating for Bovine TB. Membership of the group will be reviewed periodically.

Secretariat

To be provided by the NFU Cymru Policy Adviser

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Progress

A number of meetings have been held between June and November 2021 with Industry, Welsh Government, APHA, Veterinary Representatives and Academia. The Group have decided to issue a preliminary set of draft recommendations to stimulate discussion within NFU Cymru. The draft recommendations cover topics discussed in meetings to date. The Group recognise that there are a number of key areas which they have not yet had the opportunity to consider. The Group also highlight that a number of the draft recommendations should be considered as 'work in progress'. The Group felt it important to share their work to date with the NFU Cymru President / Deputy President, NFU Cymru Council and the wider membership for comment and to generate discussion and debate.

The group made a conscious decision not to focus on recommendations in relation to wildlife within their initial work programme. The views of NFU Cymru are well known on this matter and the Group fully support the position of NFU Cymru in calling for a comprehensive TB eradication programme in Wales that actively tackles the reservoir of disease in both Cattle and Wildlife Populations.

Draft Recommendations

Testing

The group supported the need for a thorough review and analysis of the current testing protocols whilst bearing in mind that the single intradermal comparative cervical tuberculin test (SICCT) is likely to remain as the OIE test requirement for herds to become officially TB free. Any changes to testing must not impact on the ability of cattle and beef/dairy products from Wales to be able to be traded within the UK and further field.

There was broad consensus that the skin test is good at finding disease at a herd level but not so effective at identifying all infected animals in the herd and therefore not the ideal test for identifying disease in individual animals. Concern was raised in herds subject to frequent testing that there could be possible distortions with the constant introduction of tuberculin intradermally.

On a practical level the SICTT test requires the cattle to be put through the crush twice whereas some of the alternative tests would only require them to go through once at any given test which would be a significant saving both in terms of on farm resource and veterinary resource and less stress on the cattle.

The annual herd test across Wales should continue. Whilst the Group is supportive of the regionalised approach in Wales it does bring with it complexities with regards to testing requirements. The frequently asked questions available on the website is to be commended but as it gets longer with regular updates it does get harder to comprehend. We will return to how this matter could be addressed within the communication section.

In relation to the pre movement testing (PrMT) of animals it was felt that a thorough investigation and analysis (including cost benefit analysis) should be undertaken to consider the most appropriate test for the PrMT. Consideration needs to be given to the skin test and whether to use at standard or severe interpretation or whether another test altogether would be more appropriate. As part of this review consideration of the consequences of a change in test for the buyer, seller and within business moves (where a PrMT is required) needs to be considered. A technical advisory group that includes members of the farming and veterinary profession should consider the options in more detail.

Whilst respecting that a herd cannot be deemed as clear of disease without undertaking a clear SICTT test the group recommend more flexibility with regards to the testing regime for herds whilst under restriction, particularly for long term breakdowns. The farmer working closely with their own vet and APHA should have the opportunity to consider a testing regime based on the specific circumstances and epidemiological challenges facing the herd. This may involve use of a greater

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range / combination of tests and on occasion veering from the continuous 60-day skin test regime. The farmer must be made fully aware of the potential implications and consequences of adopting a bespoke approach.

The current shortage of vets does occasionally result in timeliness issues, the Group recommend the use of trained lay testers to carry out both the SICTT and blood tests. We believe that this would also have the added advantage of freeing up veterinary resource that could be better deployed supporting the farmer with managing the breakdown and devising a strategy to ensure that the herd becomes clear in the shortest possible time.

WG/APHA should provide keepers with the option of receiving individual test chart results for every animal at each test. This would potentially allow the keepers to make informed decisions as to whether animals are to be retained in the herd or not, particularly those that have previously tested as inconclusive or continually display a reaction to Bovine tuberculin. APHA should provide a password protected portal for keepers to be able to access this information. We believe with this information there are opportunities for farmers to work with their vet on risk management. The group also considered the possibility of inconclusive reactors, that subsequently become clear, being restricted to that herd for life. The group felt that Welsh Government should consider an incentive payment to remove IRs and other animals identified as 'at risk'.

The increased use of novel tests is likely to identify diseased or at-risk animals earlier. This inevitably means that potentially more animals within individual herds would be taken for slaughter and more herds may be placed under restriction. Whilst this may be beneficial from the disease control point of view, the implications of the loss of many productive animals at the same time will have on the business should not be underestimated and the group believe that this matter requires further consideration, considering how farming businesses can be supported and to have access to viable trading outlets whilst under restriction.

Communication

The Group see improved communications as a vital issue where there is scope for a great deal of improvement. Tailored communication strategies need to be designed e.g., for those who come under restrictions for the first time; for those that find themselves in long term herd breakdown situations and for areas of Wales where Bovine TB has not been a common issue historically.

Whilst recognising the statutory requirement of providing the necessary paperwork the sheer volume means that important messages are often lost to the detriment of disease control. The amount and complexity of paperwork needs to be urgently addressed by APHA/WG. The Group recommend the setting up of a working group involving members of the Focus Group and APHA / WG to look carefully at all communications between APHA and Farmers. Communication needs to be tailored to ensure that it is clearly understood by the reader. It needs to be recognised, for example, that farmers (and even vets) in areas of the country where TB has not historically been a problem will have a lesser understanding of the terminology and detailed rules associated with Bovine TB rules compared to farmers (and vets) in a high incidence area where unfortunately the disease has become part of everyday life.

The Group recommend the setting up a password protected portal (perhaps on the RPW online portal) where cattle keepers could access in date order the letters that have been sent to them by Government.

There is a need to consider the ability to contact the appointed case vet when needed. All too often farmers find that she/he is not available (not helped by a large turnover and reassignment of case vets) and queries are passed on to the duty vet who may have other priorities and takes time to return calls on matters which are often urgent. It may be that greater use of Technical/Animal Health Officers could be considered, with an AHO also assigned to a herd breakdown to help act as a

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conduit and provide customer service at time when the case vet will not be available within a reasonable timeframe.

The group recommend the farmers own vet be far more involved in the management of a TB Breakdown. Dealing with a breakdown on farm should be a genuine partnership between farmer, the farmer's own vet and the APHA. There is a need to look again at how a timely and meaningful meeting can be set up between the three parties and how all three can continue to work together throughout the course of a herd breakdown agreeing a strategy to ensure the disease can be tackled as quickly as possible and a plan subsequently agreed to try and prevent recurrence. Whilst these meetings should ideally take place on farm the opportunity presented through virtual meetings could be used if needed. The overall aim must be a meaningful and practical action plan that has been jointly developed and agreed by all three parties. We recognise the role that Welsh Government have played in trying to facilitate this relationship through Cymorth TB but believe this approach needs to be reinvigorated.

The Group have also considered the possibility of a group of farmers in a defined area e.g. parish or sub county level, working in partnership with local vets, APHA / WG and research bodies e.g. Aberystwyth University on an action plan for an area to better understand the disease picture, the drivers behind disease spread and a co-ordinated plan to consider how the disease could be tackled. This is something that the Group will consider in more detail during their next phase of work.

The complexity and constantly changing rules associated with Bovine TB is a huge cause for concern. This can be in relation to many issues including dealing with a breakdown, pre and post movement testing, the rules around AFUs, contiguous testing or even moves between areas of different TB status. The Group believe that APHA / WG should instigate a dedicated helpline that would provide a central point of contact for farmers in Wales to be able to seek advice and guidance on TB rules. The helpline could operate in a similar manner to how the Customer Contact Centre operates for RPW Schemes. Alongside this would be the assistance that could be provided by Animal Health / Technical Officers for farms under restriction when the case vet was unavailable.

Biosecurity

Good biosecurity as with any disease control programme is vital, for TB control going forward, everything possible needs to be done to ensure that this can be implemented. With the current Welsh Government policy prohibiting the cull of diseased wildlife the Group believe that Government has an added responsibility to support farmers in being able to operate good biosecurity, in particular with regards to the separation of cattle from badgers wherever possible.

The group strongly recommend that Welsh Government through future capital grant schemes includes items that support good biosecurity and in particular enable effective separation of Cattle and Wildlife to be supported. Measures to stop badgers entering sheds should be a priority and separation in fields with known badger sets on adjoining land. Intervention rates should be set at 70-80% and based on actual costs.

Informed Purchasing

Informed Purchasing has a role in future TB control but will need careful thought and a recognition that it could result in a two-tier market for both dairy and beef cattle with a severe impact on some businesses. Businesses that are often constrained from improving their disease status as a result of a government policy that allows for a reservoir of infection to remain within the wildlife on their farm.

Informed purchasing will only work with a reliable up to date easy to access database. Therefore, its inception will need to wait until EID Cymru is up and running and the disease status of both individual animals and the herd status can be easily and accurately recorded and viewed. Thought also needs to be given to how it would work with cattle sold through markets and how purchasers in this important sale method can be best informed.

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Risk will also need to be considered in relation to production systems i.e., those animals sold for further breeding potentially more of a risk than those for finishing for example.

It is also important to restrict provision of information to those who have a legitimate reason to access the cattle database through a password protected data portal.

Calves/AFU's/Orange Markets

The Group emphasised the importance of both approved finishing units and orange markets as an avenue of sale for those farms who find themselves under restrictions of movement due to TB. AFU numbers are sadly lacking in Wales with many cattle having to be sold to English AFU's. The Group recognise that there is further work needed to investigate the barriers to the establishment of further AFUs in Wales. Orange markets are welcomed but it is sometimes difficult to attract buyers in sufficient numbers to these markets. Also selling calves off herds that are not officially TB free is a major problem due to the very small number of AFU's willing to take young calves under 42 days (after that they need to be tested before moving to an AFU).

Welsh Government should undertake a risk assessment to investigate the possibility of raising the 42-day rule to 90 days without the need for testing. There is also the issue of timeliness with regards to the issuing of movement licenses meaning farmers missing slots to get cattle into AFU's. Consideration should be given to a general licence being issued where a breakdown herd has a contract with an approved finishing unit. The focus group highlighted that during the course of a breakdown APHA will restrict the sale of calves for significant periods of time, this makes it extremely difficult for effective supply chain relationships to be developed between the farm and the AFU. This must be simplified.

Conclusion

The draft recommendations within this report are presented as a document that we hope will generate discussion. The recommendations are in no way comprehensive, and the group recognise that there is a need to consider these recommendations and many more in further detail in the next phase of work. The Group recognise that these recommendations will not find favour with all, in fact, even within the Group there was and continues to be differing views on many topics. We see this as healthy recognising the amount of thought and consideration that everyone gives to this disease and how to tackle it on their own farm and across Wales. The one common aim of everyone on the Group is the determination that the status quo cannot continue and as farmers we must continue to strive to eradicate this horrendous disease from our herds and our countryside. We recognise that there are extremely important topics that we have yet to provide comment on and top of this list is our concern for the mental health and wellbeing of our farmers, vets, and everyone else who is impacted by this disease. The Group are also keen to consider the role that accreditation schemes e.g. CHeCS TB could play in Bovine TB control and eradication.

We reiterate that the Group are adamant that the active removal of disease across all vectors is critical to a successful TB eradication strategy.

The Group would like to thank all those experts who have given up their time to provide evidence to the group and the willingness of all of them to attend our meetings and so willingly, positively, and actively contribute to our work.

We welcome your observations on these draft recommendations.

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Summary of Recommendations

- A thorough review and analysis of the current bovine TB testing protocols (including cost benefit analysis) should be undertaken. A technical advisory group that includes members of the farming and veterinary profession should consider options going forward in more detail.
- The group recommend more flexibility with regards to the testing regime for herds whilst under restriction, particularly for long term breakdowns.
- The Group recommend the use of trained lay testers to carry out both the SICTT and blood tests. Veterinary resource should be focussed on supporting the farmer with managing the breakdown and devising a strategy to ensure that the herd becomes clear in the shortest possible time.
- WG/APHA should provide keepers with the option of receiving individual test chart results for every animal at each test. With this information there are opportunities for farmers to work with their vet on risk management. Welsh Government should consider an incentive payment to remove IRs and other animals identified as 'at risk'.
- The use of novel tests is likely to identify diseased or at-risk animals earlier. This inevitably means that potentially more animals will be taken for slaughter and more herds may be placed under restriction. Whilst this may be beneficial for disease control the implications of the loss of many productive animals at the same time will have on the business should not be underestimated and the group believe that this matter requires further consideration as to how farming businesses can be supported and to have viable trading outlets whilst under restriction.
- The Group see improved communications as a vital issue where there is scope for a great deal of improvement. Tailored communication strategies need to be designed e.g., for those who come under restrictions for the first time; for those that find themselves in long term herd breakdown situations and for areas of Wales where Bovine TB has not been a common issue historically.
- The amount and complexity of paperwork needs to be urgently addressed by APHA/WG. The Group recommend the setting up of a working group involving members of the Focus Group and APHA / WG to look carefully at all communications between APHA and Farmers.
- The Group recommend the setting up a password protected portal where cattle keepers could access in date order the letters that have been sent to them by Government.
- There is a need to urgently consider how a farming business under restriction can receive timely responses to queries / licence requests from their Case vet / APHA.
- The group recommend the farmers own vet be far more involved in the management of a TB Breakdown.
- The Group believe there are opportunities for groups of farmers in a defined area e.g. parish or sub county level, working in partnership with local vets, APHA / WG and research bodies on an action plan for an area to better understand the disease picture, the drivers behind disease spread and a co-ordinated plan to consider how the disease could be tackled.

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- The Group believe that APHA / WG should instigate a dedicated helpline that would provide a central point of contact for farmers in Wales to be able to seek advice and guidance on TB rules.
- The group recommend that Welsh Government through future capital grant schemes includes items that support good biosecurity and in particular enable effective separation of cattle and wildlife to be supported. Intervention rates should be set at 70-80%.
- Informed Purchasing has a role in future TB control but will need careful thought and a recognition that it could result in a two-tier market with a severe impact on some businesses. Informed purchasing will only work with a reliable up to date easy to access database.
- The Group emphasise the importance of both approved finishing units and orange markets as an avenue of sale for those farms who find themselves under restrictions of movement due to TB. The Group recognise that there is further work needed to investigate the barriers to the establishment of further AFUs in Wales.
- Welsh Government should undertake a risk assessment to investigate the possibility of raising the 42-day rule to 90 days without the need for testing. There is also the issue of timeliness with regards to the issuing of movement licenses meaning farmers missing slots to get cattle into AFU's. Consideration should be given to a general license being issued where a breakdown herd has a contract with an approved finishing unit.