



Consultation Response

FROM THE RSPCA IN WALES

Welsh Government: A Refreshed TB Eradication Programme

January 2017

The RSPCA welcomes the opportunity to engage with the Welsh Government on this consultation regarding updating the bTB eradication programme. Bovine TB is a devastating disease, and causes grief to so many, particularly within the farming community.

RSPCA Cymru has consistently supported humane, scientifically-proven and effective methods to tackle this disease which are discussed in more detail below.

QUESTION 1: DO YOU AGREE WITH ANY OF THE PROPOSALS SET OUT IN THIS DOCUMENT? (PLEASE SAY WHAT PROPOSALS YOU AGREE WITH AND WHY YOU AGREE WITH THEM)

RSPCA Cymru applauds the Welsh Government with the success it has had with focusing on cattle based measures in reducing levels of the disease. It welcomes the cattle proposals laid out in this document and summarised in Annex A. We agree that the heart of the issue is getting the spread of bTB under control through cattle measures, which we have advocated ever since we first became members of the TB Action Group, over ten years ago. The importance of this is underlined by the comment in the consultation document that the disease is present in cattle in areas that were only subjected to four year testing.

QUESTION 2: DO YOU DISAGREE WITH ANY OF THE PROPOSALS SET OUT IN THIS DOCUMENT? (PLEASE SAY WHAT PROPOSALS YOU DISAGREE WITH AND WHY YOU DISAGREE WITH THEM)

Some of the statements regarding the role of wildlife in the disease spread are not specific enough. Evidence of disease is noted in a "proportion" of the badgers within the proposed High TB areas, however this proportion is not stated. It is important not to give the impression that badgers and other wildlife have a significant role to play in the current disease status, since the evidence for this is poor and Wales has been making excellent progress in reducing the number of herd breakdowns by cattle controls alone.

Regarding the All Wales Badgers Found Dead Survey, the RSPCA has always supported the need for more information on the prevalence of TB in badger populations, especially in areas where the disease is not considered to be 'endemic' in the cattle population. We stated that one of the failings of the seven counties study that was conducted during the RBCT was flawed as it focused on areas that were already known to be a problem. Data on the prevalence of TB in the badger population is important to understand if there is an underlying source of infection in wildlife in areas where the disease is not present in cattle and to help inform those who believe that badgers are

the source of the disease that this may not, in fact, be the case. We do note that, according to figure 5 in the consultation document, only two positive badgers appeared to have been found in the IAA which could be cautiously interpreted as a successful result of the vaccination scheme, but certainly demonstrates the need for such surveys.

The Society was glad to see Wales lead the way by introducing Veterinary Improvement Notices to emphasise the importance of biosecurity in bTB control. In this refreshed eradication programme we would like to see biosecurity measures become more integral in the control of bTB spread in all the proposed TB areas. This would be especially important in the Intermediate and High TB areas where a large number of breakdowns are found by contiguous testing or recur within 18 months, suggesting that spread is occurring locally between cattle and through persistence of infection on farm (possibly through infected cattle being undetected, but also through environmental contamination by infected cattle that have been removed). A study into the number of farms with biosecurity measures in place and the effect of implementation on herd breakdown numbers would be useful to look at the effectiveness of such measures.

We note that in Low TB areas, it is proposed to retest inconclusive reactors with the IFN- γ test and remove positives and keep negatives isolated on that farm. If the negatives are therefore perceived as a potential risk, should they also not be removed, i.e. treat all inconclusive reactors as positive?

There is also a proposal that cattle moved from a higher disease area to a lower disease area will require Post-movement Test, but we believe it would be better to not move cattle from a higher disease area to a lower and so avoid the risk completely. Risk based trading has been proposed by many as another tool to manage this disease and this is an example where such risk based measures should be introduced and enforced.

Finally we note in Annex A that you propose to *'Explore and develop ways to break the transmission cycle between cattle and badgers where it can be demonstrated badgers are contributing to the problem in chronic herd breakdowns'*, which is a more detailed statement than was included in the main proposals. We support the principle that it should be demonstrated scientifically that badgers are indeed contributing to the problem before any lethal measures are proposed. We would therefore be interested to know what measures you plan to introduce to do this. Many years of data collection and research conducted on the badgers' role in the epidemiology of bovine TB have failed to find a direct method of transmission between badgers and cattle. We would not want to see decisions taken on the assumption that as no evidence for the disease can be found in the herd that it must be the badger; rather, we would prefer to see an extensive study on husbandry practices on farms that suffer recurring outbreaks as we suggest under question 5.

QUESTION 3: DO YOU HAVE ANY SUGGESTIONS ABOUT HOW THE CONTROLS PROPOSED IN THIS DOCUMENT COULD BE IMPROVED OR HOW THEY COULD BEST WORK IN PRACTICE?

More use of IFN-gamma testing in pre-movement testing as well as testings instigated as a result of a breakdown. This would be particularly useful in the proposed Intermediate and High areas as there appears to be breakdowns occurring as a result of infected cattle being moved to uninfected farms. A risk based trading scheme would be very useful in ensuring farms within an area can trade cattle between equal or lower status farms or take an informed risk, perhaps followed by, or preceded by, voluntary IFN-gamma testing of higher risk animals bought in. This would be alongside the statutory skin tuberculin test required in such a situation.

Regarding the question of EFUs in Low TB areas, we would suggest that if they are permitted cattle should be from farms with lowest TB risk, i.e. farms that have not suffered a TB breakdown within a certain number of years (3+). Bovine TB control needs to address environmental contamination, and so even if these animals were kept indoors, the waste materials, which would contain infectious material should an *M. bovis* positive animal be found in such a unit, would need disposing of in such a way as to prevent further risk of infection either to cattle or the local wildlife population. A decision should be based on the number of breakdowns occurring in EFUs located in the proposed Low TB area and thus the risk they represent.

QUESTION 4: ARE THERE ANY OTHER CONTROLS YOU THINK WE SHOULD CONSIDER TO HELP MEET THE AIMS SET OUT IN THIS DOCUMENT?

None beyond those already mentioned.

QUESTION 5: WE HAVE ASKED A NUMBER OF QUESTIONS RELATING TO SPECIFIC PROPOSALS. IF YOU HAVE ANY OTHER COMMENTS ON OTHER ASPECTS OF THE TB ERADICATION PROGRAMME, PLEASE SET THEM OUT BELOW.

Further studies to analyse the effectiveness of biosecurity controls to reduce wildlife cattle interaction would be helpful. Furthermore, it would be beneficial to investigate the observed trend that dairy cattle tend to be more susceptible. Causes for this could be the intense breeding that dairy cattle have been subjected to over the years, resulting in them possibly having a compromised immune system, which combined with poorly ventilated and uncomfortable housing may have predisposed dairy cattle in particular, to an increased susceptibility to the disease. Underlying conditions such as Johne's Disease and Bovine Viral Diarrhoea may also be contributing factors. Finding out the farm status of such diseases, and whether they appear to be linked to TB breakdowns would be of interest and could guide further advice to producers on how to reduce their herd susceptibility.

Under the Reasons for Change you state a number of possibilities for the observed trend in dairy cattle being more susceptible and we highlight some of these above. We would suggest that there should be a research project looking at husbandry factors that may play a role in the maintenance of this disease. This could compare dairy herds with beef herds and herds that suffer repeat breakdowns with others that do not. This research would require a large sample set and on farm visits, rather than questionnaires, in order to capture the data objectively.

RSPCA GENERAL POINTS

The RSPCA is concerned about the terminology used in the consultation document and feels that the Welsh Government should be clear in its communications - is the intention to become officially TB free, and so obtain OTF status, or eradicate the disease. We are also not sure if you are using stamp out as a synonym for eradicate.

We believe that there needs to be a clear distinction between eradication and achieving OTF status. OTF status is a worthwhile objective and potentially obtainable through strict cattle control measures whereas eradication means removing the disease from the whole of the cattle herd, and the wider environment, something we believe is not possible. Using a term like eradication only places an unrealistic expectation in the minds of those working to deal with the problem.

It should be made clear that OTF status can be achieved, as Scotland has done, with low levels of disease occurring and that these then need to be managed. This may include a wildlife element, but the RSPCA is yet to be convinced that the interplay between badgers and cattle is fully understood in order to support any proposals that require the removal of badgers.

In the introduction there is a statement that the disease is endemic in some areas and difficult to eliminate from areas where cattle and wildlife are both infected and can infect each other - the RSPCA would be interested to know on what data this conclusion is based and what mechanisms have been identified for the cross infection of cattle or wildlife.

There are several references made to the infectious state of badgers and whether they are one of the drivers of the disease in the areas concerned. Although we believe that the badgers do have a role to play, as demonstrated by the RBCT, we believe that certain assumptions are made about their role in a particular area with no real evidence to support this. Therefore the RSPCA would be keen to know what evidence is used to define the badgers' role as described in the document.

The RSPCA is delighted that the Minister has ruled out an England style cull of badgers¹. We believe that the culling of badgers as currently practised in England has been proven to be inhumane and its effectiveness as a means of reducing the disease in cattle has yet to be demonstrated - in fact it risks making the situation worse. We support the Cabinet Secretary's statement ruling out an England style badger cull but we are more cautious about accepting proposals such as trap/vaccinate/remove (TVR). We would want to see how this policy has worked in Northern Ireland before we would support the development of this policy in other parts of the UK, as we are sceptical of the ability of any test used in the field to accurately determine the disease status of the badger.

The badger removal operations conducted as part of the 'interim strategy' between 1986 and 1997 used an Elisa test (effectively the same test as the Statpak test used until recently). This test had a low sensitivity (true positives), but a high specificity (true negatives). As a result, the test was used on a group basis; if a badger was found to test positive, then that social group was removed, regardless of the test status of other animals in the group. The results were obtained quickly but badgers were not processed set side, but at a portacabin nearby.

Therefore a decision to remove a test positive animal, based on the use of a single test with a low sensitivity, has the potential to remove a number of animals that are false positives.

The RSPCA used the Statpak/Elisa test for cubs undergoing rehabilitation, but we used it three times to confirm the cub was negative. Any cubs that tested positive were put to sleep; most on post mortem were found to be negative.

So at present the RSPCA could not support TVR until the results of the Northern Ireland project are known. We also understand that TVR in Northern Ireland is clearly understood to be a limited duration research project and that assurances have been given that the TVR will not be extended or rolled out. However we are very keen to engage in discussions with the Welsh Government in relation to any proposed management regimes for the control of bovine TB.

¹<http://gov.wales/newsroom/environmentandcountryside/2016/161018-cabinet-secretary-announces-regionalised-approach-to-tackling-bovine-tb/?lang=en>