



ConsultationResponse

FROM THE RSPCA IN WALES

Consultation response: A Refreshed TB Eradication Programme February 2022

RSPCA Cymru welcomes the opportunity to respond to the consultation on the Welsh Government's Refreshed TB Eradication Programme - including proposals for the testing programme, informed purchasing of cattle and payments.

Bovine TB is a devastating disease, but this consultation 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 primary spread between cattle, and RSPCA Cymru therefore commends the Welsh Government's continued lead focus on cattle-based measures to control bTB.

This consultation 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 this refreshed 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.

Broadly, the RSPCA 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; and, further to this response, we would be happy to provide any further information useful to the Welsh Government to ensure animal welfare is at the heart of this new Eradication strategy.

1. CURRENTLY, EXISTING LEGISLATION STATES PrMT IS NOT REQUIRED FOR CATTLE MOVEMENTS FROM HERDS LOCATED IN THE LOW TB AREA BUT MOVEMENTS INTO THE LOW TB AREA FROM HIGHER TB AREAS REQUIRE A PoMT. THIS MEASURE WAS PUT IN PLACE IN 2017 BASED ON THE FACT THE MAJORITY OF TB BREAKDOWNS WERE AT THE TIME CONSIDERED TO BE THE RESULT OF UNDETECTED INFECTION BROUGHT IN THROUGH CATTLE MOVEMENTS FROM HIGHER RISK TB AREAS. HOWEVER, RECENT EPIDEMIOLOGICAL ANALYSIS HAS RECOGNISED LOCAL MOVEMENTS WITHIN THE LOW TB AREA HAVE CONTRIBUTED TO THE SPREAD OF DISEASE IN THE DENBIGHSHIRE AND VALE OF CONWY AREAS, AND RE-INTRODUCTION OF PrMT WOULD HELP CURTAIL THIS SPREAD. DO YOU AGREE WITH THIS PROPOSAL?

Yes, although we would recommend that such requirements in the Low TB area 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

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

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.

2. CATTLE ENTERING THE LOW TB AREA FROM HIGHER INCIDENCE AREAS NEED A CLEAR PrMT. DO YOU AGREE CATTLE MOVING INTO THE LOW TB AREA FROM A HIGHER INCIDENCE AREA SHOULD ALSO REQUIRE A PoMT ON ARRIVAL?

Yes, 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 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.

3. DO YOU AGREE CATTLE MOVING INTO THE INTERMEDIATE TB AREAS FROM HIGHER TB INCIDENCE AREAS SHOULD HAVE A PoMT?

As above, we would recommend this is 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.

4. DO YOU AGREE WITH WELSH GOVERNMENT EXPLORING THE TEMPORARY INTRODUCTION OF PoMT OF CATTLE ORIGINATING FROM AN IDENTIFIED TB HOTSPOT, OR HIGH RISK HERDS?

5. WHERE DO YOU FEEL THIS POLICY WOULD HAVE THE MOST IMPACT? (FOR EXAMPLE HIGH TB AREAS, INTERMEDIATE TB AREAS OR LOW TB AREA).

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 thus 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.

6. THE CLEARING TB TEST IS A TEST WHICH IS USED AT THE END OF A BREAKDOWN TO DETERMINE IF A HERD CAN BE RELEASED FROM TB RESTRICTIONS. THE REQUIREMENT FOR AN ADDITIONAL TEST PRIOR TO MOVEMENT OF ANIMALS, 42 DAYS AND OLDER, IS CURRENTLY ONLY APPLIED IN CIRCUMSTANCES WHERE A HERD HAS BEEN UNDER RESTRICTIONS FOR 18 MONTHS OR LONGER (I.E. IS A PERSISTENT TB BREAKDOWN). CURRENTLY A KEEPER OF A PERSISTENT HERD BREAKDOWN WILL HAVE TO WAIT A FURTHER 60 DAYS AFTER RESTRICTIONS ARE LIFTED, AND COMPLETE A PrMT BEFORE THEY CAN MOVE OR SELL THOSE ANIMALS. EXTENDING THE PERIOD BEFORE THESE ANIMALS CAN MOVE AND REQUIRING AN ADDITIONAL CLEAR TEST INCREASES THE LIKELIHOOD OF IDENTIFYING UNDISCLOSED INFECTION REMAINING IN THE HERD. IT IS PROPOSED, THEREFORE, POLICY IS AMENDED SO A BREAKDOWN CLEARING TEST CAN NO LONGER BE USED AS A PrMT. A FURTHER CLEAR TEST WOULD BE NEEDED FOR ANIMALS OF 42 DAYS AND OVER, BEFORE A MOVEMENT FROM ANY POST-BREAKDOWN PREMISES IS ALLOWED FOR PrMT PURPOSES. DO YOU AGREE WITH THIS PROPOSAL?

7. WHERE DO YOU FEEL THIS POLICY WOULD HAVE THE MOST IMPACT? (FOR EXAMPLE HIGH TB AREAS, INTERMEDIATE TB AREAS OR LOW TB AREA, OR IN SPECIFIC CIRCUMSTANCES).

This measure is targeted at those higher risk herds, and thus is more reasonable. We would recommend that this is introduced if it is found that movements of animals immediately following a herd clearing test is occurring and such animals are subsequently becoming bTB positive. We recognise the particularly high level of strain some persistently infected herds are under, particularly regarding numbers of animals on their farm, and thus we feel it would only be reasonable to restrict their ability to move cattle off-farm after a herd clearing test if this is shown by the data to be a necessary step.

Considering sales of large numbers of animals off such (historically) persistently infected herds can have wide-reaching dispersal and thus potential seeding of bTB, we would suggest it is likely to be impactful in all areas. However, we also recognise that a persistently infected herd becoming clear for the first time in 18 months or more is a significant achievement in that herd. It is likely to be due to considerable effort made by staff as well as adaptations to herd management and we feel this needs recognising by only bringing in additional restrictions for such herds should they be necessary.

8. DO YOU AGREE WITH THE STATEMENT 'THE TEST USED AS A PrMT SHOULD BE MORE SENSITIVE AND THEREFORE MORE LIKELY TO IDENTIFY TRULY INFECTED CATTLE BUT ACKNOWLEDGE THIS WOULD BE AT THE EXPENSE OF IDENTIFYING MORE FALSE POSITIVE CATTLE'?

Yes, 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.

9. DO YOU ACKNOWLEDGE THAT IF BLOOD TESTING (GAMMA OR IDEXX) TESTING IS DEPLOYED AS A PrMT, THERE MAY BE AN ADDITIONAL COST TO TESTING, WHICH COULD NOT BE MET BY GOVERNMENT?

It is not clear what the financial envelope is around any additional costs 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.

Should the Government go down the route of passing on such additional 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*" - and, in such a situation, its contingency proposals to ensure costs associated with testing can be sufficiently met.

10 THE WELSH GOVERNMENT PROPOSES THE FOLLOWING: 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 TESTING ANIMAL DIRECT TO SLAUGHTER, OR A SLAUGHTER GATHERING UNDER LICENCE; II. ANY ANIMAL LICENCED BY THE ANIMAL AND PLANT HEALTH AGENCY (APHA). DO YOU AGREE WITH THE PROPOSED APPROACH?

Yes, this is an essential change in our view.

11. THE TB (WALES) ORDER 2010 (AS AMENDED) SPECIFIES: NO PERSON MAY PERFORM A TEST FOR TUBERCULOSIS ON A BOVINE ANIMAL EXCEPT WITH THE WRITTEN CONSENT OF THE WELSH MINISTERS AND A PERSON TO WHOM ANY SUCH CONSENT IS GIVEN MUST REPORT THE RESULTS IMMEDIATELY TO THE WELSH MINISTERS. IT IS PROPOSED THE PROHIBITIONS IN THE TB (WALES) ORDER 2010 (AS AMENDED) ARE EXPANDED TO INCLUDE SAMPLING AND TESTING ON SAMPLES TAKEN. THIS IS 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. THERE IS CURRENTLY A RISK SAMPLES COULD BE TAKEN AND/OR TESTED FOR TB AND WITHOUT THE WELSH GOVERNMENT'S KNOWLEDGE AND THERE COULD THEREFORE BE DIFFICULTY IN RECEIVING THE RESULTS AND ACTING UPON THEM. THIS WOULD POSE A RISK TO DISEASE CONTROL AND ERADICATION. DO YOU AGREE WITH THIS APPROACH?

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.

12. PROPOSED AREAS OF CHANGE: ADDING A NEW MAP TO IBTB SHOWING THE NUMBER OF YEARS UNRESTRICTED CATTLE HERDS HAVE BEEN OFFICIALLY TB FREE (OTF); MANDATE PROVISION AND DISPLAY OF TB INFORMATION AT POINT OF SALE. DO YOU AGREE WITH THE PROPOSALS OUTLINED? PLEASE EXPLAIN YOUR REASONS.

Regarding the inclusion of numbers of years a herd has been free of bTB on ibTB we feel this data is readily available and thus 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.

13. IN THE FUTURE, DO YOU BELIEVE THERE SHOULD BE IMPLICATIONS FOR CATTLE KEEPERS WHO FAIL TO TAKE NOTICE OF TB INFORMATION, AND MAKE A PURCHASE REGARDLESS OF HIGHLIGHTED RISKS? PLEASE EXPLAIN YOUR REASONS. WHAT DO YOU BELIEVE THESE IMPLICATIONS SHOULD BE?

Yes. 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. However, we also 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.

14. THE WELSH GOVERNMENT PROPOSES TO LINK TB PAYMENTS TO IMPLEMENTATION OF DISEASE PREVENTION AND CONTROL PRACTICES. WHAT ARE YOUR VIEWS ON THIS?

In principle we agree with this, however it would depend on the details of any such proposals in the future. Indeed, such a principle is consistent with our wider calls for the Welsh Government to incentivise responsible, positive actions from the farming community to achieve positive results for animals - such as incentivising higher welfare standards on farms under a new post-Brexit payments system being delivered via the future Agriculture (Wales) Bill.

Cattle movements, although a significant risk factor, are not the only thing producers can be doing to manage bTB risk on their farm, regardless of their bTB risk and status. The RSPCA have stated in the past that we believe all farms should have, and implement a bTB management plan and that if this is not implemented and a bTB breakdown is seen, there should be some implications. The Welsh Government would have to ensure consistency in terms of what herds were advised and expected to do based on their unique circumstances to ensure fairness, and this would involve significant collaboration with those helping producers develop such plans, such as vets.

15. TABLE VALUATIONS AS PER CURRENT ENGLISH SYSTEM; 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. AN INDUSTRY LEVY WOULD PARTLY FUND TB PAYMENT COSTS. DO YOU AGREE / DISAGREE WITH ANY OF THE 3 PROPOSALS?

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 2018² and appears to have had some success in New Zealand. 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.

17. THERE HAVE BEEN CASES WHERE A GROUP OF YOUNG CALVES HAVE BEEN IDENTIFIED WITH TB IN THE LYMPH NODES ASSOCIATED WITH THEIR DIGESTIVE TRACTS, SUGGESTING INGESTION OF INFECTION. THESE CASES OF TB IN YOUNG CALVES ARE INVARIABLY ASSOCIATED WITH THE PRACTICE OF FEEDING RAW COW'S MILK EXCLUDED FROM THE BULK MILK TANK FOR OTHER REASONS, SUCH AS MEDICATION WITHDRAWAL PERIODS OR HIGH CELL COUNT. ON OCCASION, THE INFECTED COW IS SUBSEQUENTLY IDENTIFIED AS HAVING UNDISCLOSED TB INFECTION IN THE UDDER. KEEPERS OF OTFW BREAKDOWN HERDS ARE ADVISED NOT TO FEED RAW COW'S MILK TO CALVES DUE TO THE POTENTIAL RISKS. IT IS PROPOSED TO EXPLORE THE POSSIBILITY OF AN AMENDMENT TO THE TB (WALES) ORDER 2010 (AS AMENDED) IN ORDER TO PROHIBIT THE FEEDING OF RAW COW'S MILK TO CALVES IN OTFW BREAKDOWNS. DO YOU AGREE WITH THIS PROPOSAL?

We agree with this proposal in part. The major risk factor, as quoted above, is the feeding of unpasteurised waste milk to calves, rather than the feeding of unpasteurised milk from the bulk tank to calves³. We would recommend that no producer, regardless of bTB status, feeds waste milk to calves. As such, prohibiting the feeding of unpasteurised waste milk on OTFW premises seems reasonable. Before extending that to unpasteurised milk from the bulk tank, there would need to be evidence suggesting that this, too, can be a source of infection to calves.

RSPCA Cymru would also flag that if unpasteurised milk from high risk cows is a risk to calves then such farms should be practising strict snatch calving from the high risk cows when they calf, otherwise the calf will potentially be exposed in the first few hours of its life. If snatch calving is practised this would have to be carefully managed on-farm to ensure calves got enough colostrum of a high quality from another source (since the maternal colostrum would be a potential source of infection). Although we would ideally like calves to be able to spend time with their mothers after birth we recognise that snatch calving as a temporary measure for infectious disease control may be necessary but that the producers should be aiming to stop this practice as soon as they are able. Generally, we do think it is best practice to feed pasteurised milk to calves and would encourage all producers to do so.

18. THE TUBERCULOSIS (WALES) ORDER 2011 CONFERS STATUTORY TB CONTROLS FOR DEER, GOATS AND CAMELIDS AND COVERS COMPULSORY IDENTIFICATION, RECORDS, MOVEMENT RESTRICTIONS, TESTING, SLAUGHTER AND COMPENSATION ARRANGEMENTS. VETERINARY IMPROVEMENT NOTICES (VINS) CAN BE ISSUED BY VETERINARY INSPECTORS. THE 2011 LEGISLATION PROHIBITS TREATMENT, VACCINATION AND TESTING FOR M. BOVIS UNLESS WRITTEN CONSENT IS GIVEN BY APHA. RELATIVELY FEW SHEEP AND PIG BREAKDOWNS OCCUR ANNUALLY IN WALES. HOWEVER, THE WELSH GOVERNMENT STILL RECEIVES INFORMATION ON A LOW NUMBER OF SUSPECT CASES IN SHEEP AND PIGS EITHER FROM ABATTOIR OR POST MORTEM EXAMINATION. NOT ALL OF THESE ARE CONFIRMED BY CULTURE OF M.BOVIS. EVEN THOUGH THESE CASES ARE INFREQUENT, THEY DO OCCUR. THERE ARE ALREADY LEGISLATIVE PROVISIONS FOR DEALING WITH CASES OF BOVINE TB IN

² Professor Sir Charles Godfray et al - Bovine TB Strategy Review, Report to Defra / Rt Hon Michael Gove MP, Secretary of State, October 2018

³ Ibid

SHEEP AND PIGS: THE TUBERCULOSIS (TESTING AND POWERS OF ENTRY) (WALES) ORDER 2008 GRANTS ADDITIONAL POWERS TO INSPECTORS TO ENTER LAND - TESTS AND SAMPLES: POWER OF ENTRY THE ANIMAL HEALTH ACT 1981 PROVIDES POWERS IN RELATION TO SLAUGHTERING OF SUSPECT SHEEP AND PIGS. COMPENSATION ARRANGEMENTS ARE IN PLACE (HIGHER COMPENSATION IN CASE OF BREEDING ANIMALS), BUT THESE RELY ON THE KEEPER TO SIGN AND AGREE TO THEM. THERE ARE ALSO REQUIREMENTS IN THE TUBERCULOSIS (WALES) ORDER 2010 REGARDING THE NOTIFICATION OF DISEASE IN CARCASSES AND CONTROL OF INFECTION FROM OTHER ANIMALS. IT IS PROPOSED THAT CONSOLIDATION OF THE REQUIREMENTS FOR SHEEP AND PIGS INTO THE TB (WALES) ORDER 2011 IS EXPLORED IN ORDER TO CONFER THE SAME REQUIREMENTS ON SHEEP AND PIGS AS WE DO ON OTHER NON-BOVINE SPECIES. DO YOU AGREE WITH THIS APPROACH?

This is likely to affect a small number of animals and their owners and is consistent with other species known to harbour bTB. One element regarding what control over these animals is proportional will be whether they are end hosts, or whether they are able to transmit infection either through environmental contamination or physical transmission. If such evidence is unclear then using the precautionary principle to apply such legislative controls seems reasonable as few would be affected.

19. THE TUBERCULOSIS (WALES) ORDER 2011, ARTICLE 5 STATES: THE KEEPER OF A DEER, ALPACA, GUANACO, LLAMA OR VICUNA MUST MARK OR IDENTIFY IT IN A MANNER APPROVED BY THE WELSH MINISTERS. IT IS PROPOSED THAT PROVISION IS MADE TO CLARIFY, FOR TB TESTING PURPOSES, A NONBOVINE MUST BE IDENTIFIABLE THROUGH A MICROCHIP, A UNIQUE NUMBER ON AN EAR TAG, OR BY A MARKING OR IDENTIFICATION METHOD APPROVED BY AN INSPECTOR. WHEN ANY ANIMAL IS TB TESTED, IT IS VITALLY IMPORTANT TO BE ABLE TO DISTINGUISH THIS ANIMAL APART FROM ANY OTHER. THERE HAVE BEEN A NUMBER OF OCCASIONS WHERE, DURING A TB TEST, KEEPERS OF NON-BOVINES HAVE REFUSED TO MARK/IDENTIFY THEIR ANIMALS APPROPRIATELY, MAKING IDENTIFICATION OF TESTED ANIMALS DIFFICULT. WHILE THE WELSH GOVERNMENT DOES NOT INTEND TO BRING IN STATUTORY IDENTIFICATION METHODS FOR THESE SPECIES GENERALLY, IT IS PROPOSED, FOR TB TESTING PURPOSES, THESE ANIMALS SHOULD BE IDENTIFIABLE AND MARKED APPROPRIATELY. DO YOU AGREE WITH THIS APPROACH? PLEASE EXPLAIN YOUR REASONS.

Yes, and would argue that the keepers of such animals should desire accurate identification methods for their stock for other reasons, such as in cases of theft.

20. DO YOU AGREE WITH THE ROLE AND REPRESENTATION OF THE TB ERADICATION PROGRAMME BOARD?

RSPCA Cymru broadly welcomes the success of Wales' TB Eradication programme which, since 2008, has had its direction and management provided by the Programme Board. Generally, therefore, we are supportive of the role of the Board; and would encourage animal welfare considerations to be at the heart of its deliberations and central to its representation and future monitoring.

21. A CLEAR TERMS OF REFERENCE FOR THE GROUP WOULD ESTABLISH THE WORKING RELATIONSHIP BETWEEN THE WELSH GOVERNMENT AND THE MEMBERS, AND OUTLINE KEY PRIORITIES FOR THE GROUP. THERE ARE, HOWEVER, MANY OPTIONS FOR ENGAGING WITH STAKEHOLDERS AS PART OF OUR PROGRAMME. SOME OF THESE OPTIONS INCLUDE: 1. MAINTAIN THE REGIONAL BOARD GEOGRAPHICAL STRUCTURE, BUT RE-START THE PROCESS OF APPOINTMENT TO THE BOARDS AND SETTING OF AN APPROPRIATE CLEAR TERMS OF REFERENCE. MEMBERSHIP WOULD BE ON A VOLUNTARY BASIS. 2. CREATE A SINGLE PUBLICLY APPOINTED TB STAKEHOLDER GROUP COVERING ALL WALES. 3. CREATE TWO PUBLICLY APPOINTED TB STAKEHOLDER GROUPS, ONE COVERING NORTH WALES THE OTHER COVERING SOUTH WALES. 4. DISCONTINUE THE REGIONAL BOARDS, AND CONTINUE WITH THE PROGRAMME BOARD ONLY. LIAISE WITH INDIVIDUAL REPRESENTATIVE ORGANISATIONS FOR STAKEHOLDER INVOLVEMENT IN THE PROGRAMME.

DO YOU AGREE WITH ANY OPTIONS OUTLINED ABOVE? IF YES, PLEASE STATE WHICH. IF NOT, PLEASE PROVIDE THE REASONS WHY,

22. DO YOU BELIEVE THERE IS AN ALTERNATIVE APPROACH? IF SO, PLEASE EXPLAIN FURTHER.

bTB is a regionally varied disease and as such RSPCA Cymru would encourage the Welsh Government to ensure any plans to reform the Board's geographical structure continues to recognise the benefits of splitting Wales into smaller regions to tackle this disease and the specific challenges arising in different parts of Wales. As such, in light of these geographical differences, we would advise against any plans to create a single publicly appointed TB stakeholder group covering all Wales; though regional groups could of course work together or in tandem where a more national approach was required. In terms of any future plans for public appointments around a stakeholder group, the RSPCA would again urge for animal welfare expertise to be a cornerstone of the recruitment process. Given the potentially changing picture of bTB across Wales, we would also urge the Welsh Government to ensure the prospect of future flexibility is built into any plans for a regional eradication structure.

23. IT IS PROPOSED A NEW TECHNICAL ADVISORY GROUP IS BROUGHT INTO THE GOVERNANCE ARRANGEMENTS OF THE PROGRAMME. THIS GROUP WOULD REPORT TO THE PROGRAMME BOARD AND CONSIDER TECHNICAL ISSUES FOR EXAMPLE CATTLE VACCINATION AND TB DIAGNOSTICS. MEMBERSHIP OF SUCH A GROUP WOULD INCLUDE EXPERTS IN THEIR FIELDS FROM ACADEMIA AND INDUSTRY. DO YOU AGREE WITH THIS PROPOSAL? IF SO, PLEASE SUGGEST SCIENTIFIC DISCIPLINES WHICH COULD ADD VALUE TO THE PROGRAMME? PLEASE EXPLAIN YOUR REASONS.

Yes, having expert advice is critical, although it may be best placed in the TB Eradication Programme Board, instead, or as a sub-committee of that Board.

26. WE HAVE ASKED A NUMBER OF SPECIFIC QUESTIONS THROUGHOUT THIS DOCUMENT. IF YOU HAVE ANY RELATED ISSUES WHICH WE HAVE NOT SPECIFICALLY ADDRESSED, PLEASE SPECIFY.

Further to the introduction to this response, RSPCA Cymru wishes to reiterate its support for the Welsh Government's ongoing commitment to use cattle-based measures to control bTB. While not covered explicitly in this consultation, we also warmly welcome the Welsh Government's decision to divert money which may have been used for killing badgers on a few farms to fund badger vaccination on a wider scale instead. This forms part of the Welsh Government's focus on cattle-based measures in the fight against the spread of Bovine TB. This move is part of the phasing out of the controversial trap/vaccinate/remove programme, which had been deployed on some farms, and required some badgers to be killed and risked unnecessarily culling healthy badgers. Instead, the Welsh Government will expand its badger vaccination programme across Wales with £100,000 of funding - which will complement the cattle-focussed measures covered in this consultation, and is wholly welcomed by RSPCA Cymru.