



Consultation Response

CONSULTATION ON PROPOSALS TO HELP ERADICATE BOVINE TUBERCULOSIS IN ENGLAND

Defra Consultation

Date: 24th March 2021

The Country Land and Business Association (CLA) is the membership organisation for owners of land, property and businesses in rural England and Wales. We help safeguard the interests of landowners, and those with an economic, social and environmental interest in rural land. Our members own or manage around half the rural land in England and Wales and more than 250 different types of businesses.

Consultation background

Bovine tuberculosis (bTB) is an infectious and contagious disease which can spread within and between cattle and badgers. The disease poses a significant threat to the livestock industry and dealing with the disease costs the taxpayer over £100 million per year. In the last year over 27,000 cattle were slaughtered to control the disease.

The government published a bTB strategy in 2014, which set out the goal of achieving officially Bovine Tuberculosis Free status for England by 2038. According to the consultation document, the current prevalence of the disease in England is stable and is beginning to show a long term downward trend. In 2018, Professor Charles Godfray was commissioned to undertake an independent review to reflect on the progress made with the bTB strategy. The UK Government published a response to the Godfrey review in March 2020, which set out the three top priorities for the next phase of the strategy. These were:

1. Accelerate work to develop a deployable cattle vaccine in the next 5 years- which could have a significant positive effect
2. Evolve the wildlife control policy by beginning to phase out intensive badger culling in the next few years, gradually replacing this with government-supported badger vaccination and surveillance. Culling will remain an option where epidemiological assessment indicates it is needed.
3. Improve diagnostic testing to identify bTB more effectively, with deployment of more sensitive tests for surveillance supported by greater use of on-farm restriction of cattle with inconclusive tests.

This consultation applies to England only.



Consultation proposals

The consultation puts forward 6 separate proposals:

1. Proposal 1- Extend post-movement TB testing to parts of the Edge Area
2. Proposal 2- Use of the interferon-gamma test in the High-Risk Area and Edge Area
3. Proposal 3- Cease issuing Badger Disease Control (intensive cull) licences for new areas post 2022
4. Proposal 4- New Badger Disease Control (intensive cull) licences issued in 2021 and 2022, could, after 2 years of culling, be revoked after a progress evaluation by the Chief Veterinary Officer.
5. Proposal 5- Reduce the initial financial commitment of cull companies to three years funding.
6. Proposal 6- Restrict any new Supplementary Badger Cull (SBC) licences to two years and cease re-issuing licences for areas which have previously undertaken SBC

General remarks

The CLA supports the UK Government's 25-year strategy to eradicate bTB and welcomes the 'new drive and concerted effort' to reduce disease levels, referenced in the Godfray Review. This next phase, focusing on the development of a cattle vaccine in the next five years and improving diagnostic testing, is a positive step. We also welcome the intention to support livestock keepers in introducing improved biosecurity on their holdings and reduce high risk cattle trading between farms. However, we are deeply concerned that if culling is heavily restricted before an effective cattle vaccine is readily available, there could be serious consequences for businesses and farmer wellbeing.



Consultation questions

Question (i): What is your name?

Cameron Hughes

Question (ii): What is your email address?

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Question (iii): What is your organisation?

The Country Land and Business Association (CLA)

Question (iv): Do you want your response to be confidential?

No.

Q1a: Do you support the proposal to introduce mandatory post-movement testing of cattle moving from higher TB risk regions of Great Britain (the HRA, Edge Areas on six-monthly surveillance testing and Wales) into those parts of the Edge Area where herds are on annual surveillance testing? a. Yes b. No c. I don't know/I don't have enough information

Yes.

Q1b: Please give reasons for your answer. Where available, please provide supporting evidence.

The principle behind the proposal to increase testing in order to prevent disease spread seems sound. However, additional testing will have implications for vets' capacity and costs for the industry, and Defra needs to ensure that both these are addressed in order to have full support.

Q2a: Do you agree with the assumptions and the assessment of costs and benefits in the Regulatory Triage Assessment on introducing post-movement testing to parts of the Edge Area? a. Yes b. No c. I don't know/ I don't have enough information

No.

Q2b: Please give reasons for your answer. Where available, please provide supporting evidence. We particularly welcome evidence on the following assumptions: • additional time and/or inconvenience to farmers of facilitating a post movement test, • batch size of bovine animals tested (i.e. the number of bovines tested) in a post-movement test, • proportion or number of inward cattle movements which use a routine diagnostic test to double up as a post-movement test (so would not require an additional post-movement test), in either 6 monthly or 12 monthly counties of the Edge Area.



There is no longer an Agricultural Wages Board, which means labour costs are set according to the market, and for external management these costs are higher, and this should be no different for owner/manager costs.

The value of a farmer's time used in table 4 (£9.37/ hour) is an underestimate. In order to ensure a smooth and efficient testing process, additional labour is often required to either help coordinate the testing process, or to complete time-critical farming tasks, such as milking, or harvesting. The 2021 (51st) edition of the John Nix pocketbook for farm management estimates median farm labour costs to be £10.46/ hour gross basic salary, with the National Insurance contribution, employer's liability insurance and workplace pension employers contribution giving an overall figure of £12.21/ hour in cost to the employer. Overtime hours are estimated to cost an employer £18.32/ hour. Given that the Standard Man Year estimation allocates a farm labour requirement of 10 hours overtime/ week, additional work to facilitate post movement testing is likely to be considered overtime and therefore cost the employer the higher figure of £18.32/ hour. These figures are based on the average farm worker earnings according to the Annual Survey of Hours and Earnings.

Testing presents a logistical challenge, particularly given vets' requirement for a continual flow of animals to be presented. Testing itself can be the shortest part of a much longer gathering process. Animals can be dispersed across a farm, some distance away from the fixed handling facilities. Testing time should factor in movement time to and from the cattle handling facilities used for testing and also the handling time itself. Once animals have had their first test, they need to be kept separate from the herd until the vet returns for the second test. The animals need to be found suitable housing to accommodate them during this interim period, and also need to be fed and inspected separately during this time. Therefore, whilst the 4 hour period spread over two days may be reasonable in a minority of instances, an 8 hour period spread over two days would be more reasonable allocation of time to coordinate the testing of the 10 animals used in the costings.

Q3a. Do you agree that Defra should revise the current policy for using the more sensitive IFN- γ test in the HRA and Edge Area, so that in addition to persistent breakdowns, use of the test is mandatory where the below criterion is met? • TB breakdowns in the HRA and six-monthly testing Edge Area counties that occur within 18 months of the herd regaining TB free status following a previous OTFW breakdown. b. Yes c. No d. I don't know/ I don't have enough information

Yes.

Q3b. Please give reasons for your answer. Where available, please provide supporting evidence.

Whilst the gamma-interferon test has a logistical advantage over the skin test in that livestock need only be gathered for testing once, there are concerns over the accuracy of the gamma test, with its tendency to return false positives- a cost which is borne by the farmer. The CLA supports increased investment in improving the accuracy of the gamma-interferon test as well as investment in more accurate and sensitive tests, as proposed in the Godfray Review.



Defra needs to ensure that the testing systems are robust to avoid any testing delays, all of which add cost and anxiety to farmers.

Q4a. Do you agree with the proposal to cease the issuing of new Badger Disease Control (intensive cull) licences after 2022? a. Yes b. No c. I don't know/I don't have enough information

No.

Q4b. Please give reasons for your answer.

Given the destructive effects of bTB outbreaks on the livelihoods and wellbeing of numerous farmers, we believe that all control measures should be retained to reduce and prevent the spread of the disease. The deployment of the whole suite of evidence-based strategies will have the greatest impact in reducing the spread of bTB. Badger culling is one such valuable tool, alongside improved testing and biosecurity measures. We share the government's hope that cattle and badger vaccines can be added to the list of tools, should they prove to be effective.

The 2018 Godfray Review found that the culling of infected badgers presents one of the possible interventions that can be deployed to lower disease incidence in cattle. The review also stated that if non-lethal interventions prove to be less effective, progress towards eliminating the disease will be slowed and the goal of complete elimination made more difficult.

Our concern is that by restricting culling as a tool, there is a significant risk of undoing the progress that has been made in recent years to reduce bTB incidence. The consultation does not provide adequate assurance that a cattle vaccine will be ready to fill the void, stating that it is hoped that a cattle vaccine will be available 'on the not too distant horizon.' Our understanding is that the 4 year field trial into the cattle vaccine is yet to start, with a planned deployment in 2025. We are also conscious that the cattle vaccines which have been deployed in other parts of the world, have been tested in very different conditions to those found within the UK and have also had mixed results.

As we have seen with the global COVID-19 pandemic, decisions need to be based on 'data, not dates.' The consultation provides no rationale as to why 31st December 2022 has been chosen as the cut-off point, to cease issuing new intensive cull licences. The strategy to eradicate bTB needs to be flexible, so the correct suite of measures can be introduced to in response to the disease as incidence levels change over time.

Q5a. Do you agree with the proposal that new Badger Disease Control (intensive cull) licences issued in 2021 and 2022, could, after 2 years of culling, be revoked after a progress evaluation by the CVO? a. Yes b. No c. I don't know/I don't have enough information

No.

Q5b. Please give reasons for your answer.



Given that the evidence indicates that culls need to last 4 years (or longer) to make an impact on bTB incidence, we query when there would be a scenario where the CVO would be in a position to revoke licences after a 2 year period. The consultation does not provide detail on the criteria or data the CVO would use in her progress evaluation.

If intensive cull licences are to be revocable in the manner proposed, the procedure needs to be flexible and to work both ways, should there be an increase in cases. We would expect that licences could be reinstated if the evidence supports this decision. If this is not made possible, there is a risk of disease proliferation and undoing the results the cull has delivered.

Q6a. Do you agree with the proposal to reduce the initial financial commitment required from the companies prior to application for a Badger Disease Control licence to the cost of three years of culling? a. Yes b. No c. I don't know/I don't have enough information

Although the CLA supports proposals to ensure that applications for Badger Disease Control licences are made as straightforward as possible, we don't have enough information to provide a full answer to this question.

Q6b. Please give reasons for your answer.

Left blank.

Q7a. Do you agree with the proposal to restrict SBC licences to a maximum of two years, and to prohibit the issuing of SBC licences for previously licensed areas or areas licensed for Badger Disease Control after 2020? a. Yes b. No c. I don't know/I don't have enough information

No.

Q7b. Please give reasons for your answer.

Any proposal to replace culling with an alternative needs to be evidence based. This proposal to restrict SBC licences and to administer training in a badger vaccination programme is premature and has been suggested before the efficacy of badger vaccinations has been satisfactorily demonstrated. Whilst there is evidence that badger vaccination can limit badger-to-badger transmissions of bTB, we are awaiting evidence that demonstrates that the badger vaccine reduces bTB incidence in cattle. The CLA would be happy to endorse a badger vaccination programme once the evidence has demonstrated that it is, at least as, or more effective than culling and once it has been proven that a badger vaccination programme is deliverable.

Any successful badger vaccination programme will have to overcome the logistical hurdles of the widespread trapping and prompt vaccination of an animal which cannot be marked to identify those which have been vaccinated. The programme would also need a highly trained and sufficiently resourced workforce to administer the programme, along with adequate funding.

Q8. Do you have any comments on the proposed revisions to the Guidance (Annex D)?

Left blank.



Q9: Do you have any other comments?

Left blank.

Comments on consultation questions

Left blank.

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