Bovine TB in non-bovine farmed animals: call for views

Defra Call for Views

Date: 20 November 2015

1. Introduction

The 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 and the rural economy. Between them our members own and manage some 10 million acres, about half of the rural land in England and Wales, including edge of settlement locations and some urban portfolios.

We have been looking after the interests of our members, as well as promoting the positive aspects of land ownership, land management and rural business activities for the past 100 years. The quality of the countryside, and its natural resources, is of vital importance to our members. Most objectives for the countryside - economic, social and environmental - rely on landowners and managers for their success. Equally, a healthy environment relies upon a thriving rural economy and financially viable agricultural businesses.

2. Responses to the Consultation Questions

Question 1: Are these the right principles?

1.1 We support an extension of the Government's existing risk based approach to TB eradication, underpinned by evidence. The transmission, control and eradication of TB in cattle will be affected greatly by the policy principles that govern non-bovine farmed animals. The primary responsibility for TB surveillance must rest with the keeper of those animals. Keepers should be in regular contact with their stock, and should always have disease surveillance in mind. Animal keepers and veterinarians all have an important role in reporting cases of TB.

1.2 The CLA agrees that holdings where TB is suspected in non bovines need to have movement restrictions applied to them, and the culling of reactor animals carried out alongside mitigation to stop the spreading of the disease to other animals.

1.3 The CLA agrees that statutory compensation should be paid to those animals compulsory slaughtered.

1.4 Compensation should amount to a level that ensures good value for money, and makes animal keepers follow high levels of compliance, both in reporting of TB and incentivising them to manage the disease risks.
1.5 We agree that the evidence base should be maintained by government, and be circulated to animal keepers and veterinarians to inform them of outbreak information and statistics.

1.6 The burden of regulation for non-bovine businesses must be comparative to those in the cattle industry, as apportioned by the risk posed by the disease. For instance, if there is evidence that one particular non-bovine animal poses a potential higher risk than another, then restrictions placed on the holding and the subsequent testing provisions should be proportionate.

**Question 2: Do you think the duty to report suspicion of TB in a bovine animal should also apply to non-bovine animals?**

2.1 The CLA believes the duty to report the suspicion of TB in bovine animals should apply to all non-bovine animals.

**Question 3: How could Defra facilitate the development of voluntary surveillance and testing schemes for non-bovine animals?**

3.1 The CLA has not been involved in the formulation of the current voluntary schemes. Those of our members who keep non-bovine farmed animals will work with APHA, and other associated organisations, to formulate voluntary schemes to test for TB.

**Question 4: Should the provisions introduced in October 2014 for camelids requiring consent for TB testing and notification of results apply to all farmed non-bovine species?**

4.1 Yes, the provisions introduced in October 2014 for camelids requiring consent for TB testing, and notification of results, should apply to all non-bovine species. This will enable a more coherent approach across both bovine and non-bovine farmed animals.

**Question 5: Who should pay for statutory TB surveillance testing of non-bovine animals, and why?**

5.1 The Government should continue to follow its existing practice of paying for statutory TB surveillance testing, and bring the testing of deer into this regime. In circumstances where an animal owner/keeper is required to pay for statutory testing, the test itself will need to provide a sufficiently effective and accurate diagnosis. The question of the frequency of the statutory testing should be determined by the level of risk associated with the transmission of infection.

**Question 6: Should statutory compensation for compulsory slaughter be extended to all non-bovine farmed animals and, if so, how should the amounts be set?**

6.1 Yes, statutory compensation for the compulsory slaughter should be extended to all non-bovine farmed animals. There needs to be a fair system if animals are compulsory slaughtered, as TB is a notifiable livestock disease. The government’s proposed policy...
principles are the correct way compensation should be paid, and the rules in which non-
bovine keepers must comply in order to receive compensation.

6.2 Currently in England:

- deer are compensated at 50% of their market value up to a maximum of £600 per
  animal
- camelids are paid £750 per animal
- there is no compensation for goats, pigs, sheep or non-bovine domestic animals.

6.3 The keeper should be compensated for the loss of the animal. This could be paid on a per
animal market value basis, or a tabular valuation from comparable market sale prices. An
independent valuer could be appointed to value the animals of high breed value, but the
introduction of a maximum valuation would limit the amount any one animal could be
compensated for.

6.4 If keepers are made to pay for the TB test then they should be fairly compensated. Farm
businesses should not be expected to suffer a loss due to a TB outbreak, if they have
abided by all of the rules under the order.

Question 7: Should keepers of meat producing non-bovine farmed animals have the
opportunity to secure for themselves a salvage value individually negotiated with a
slaughterhouse operator for compulsorily slaughtered animals?

7.1 Yes, the keepers of meat producing non-bovine farmed animals should have the
opportunity to agree individual salvage values with a slaughterhouse, if they believe they
can obtain a better price. This will place them in line with cattle owners.

Question 8: Should Government vary compensation for compulsorily slaughtered non-
bovines, to reward good behaviours or penalise bad practices? If so, how?

8.1 It is of the upmost importance that non-bovine farmed animal keepers abide by the rules
under the specific order. If those rules are intentionally broken, then there should be a
penalty imposed. If the factors affecting the breach are not clear, then an appeal process
should allow a keeper to argue the circumstances for the breach of rules.

8.2 The reward for good behaviour should be the correct amount payable for the market value
of the animal. The proper and fair amount payable should not vary due to good behaviour.
This should form part of normal disease regulations to compensate the keeper of the
animal for their loss.

Question 9: Do stakeholders agree that this approach is proportionate and targeted to the
risk? If not, what more needs to be done?

9.1 We would like to see Defra making advances in accurate diagnosis of infection by
scientific methods, and in the understanding of the spread of M bovis infection, using the
most modern techniques of microbiology. This could support the role of vaccination as a
real alternative to culling.
9.2 The flow of infection from different animal groups to others needs to be better understood. The susceptibility of non bovine animals to TB also varies, with camels and goats regarded as at high risk of infection. Testing to determine TB infection in non bovines is difficult and has practical and safety implications for those conducting the test. Defra will also need to develop an agreed veterinary protocol for the testing of camels.

9.3 If there is statutory testing of non bovines, principally camels, this should be pre-movement, especially if the animal is moving from a TB infected/ higher risk area to a lower risk area or one where no TB has been documented. In areas where there is a heightened risk of the spread of infection, it may be worth considering whole herd testing of camels. The risk of transmission of infection from camels to humans also needs to be better understood.

9.3 Other non-bovine (companion and zoo) animals should be tested if there is a risk of infection. The risk posed by companions on a farm must be measured against the risk and contact they have had with the infected stock, and should be tested as a precaution.

**Question 10: Do you have further information/ evidence that can help inform the development of any/all of these veterinary risk assessments?**

10.1 The CLA does not possess any veterinarian or scientific expertise, so is unable to comment on the specifics of the disease and its transmission.

10.2 The CLA would like to voice members concerns of the spread of TB posed by the wild deer population. Wild deer need to be regularly caught and tested for TB, in order to check if the disease is being spread across the country.

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