Bovine TB: a call for views on potential improvement and simplification of the TB testing regime in the High Risk Area of England

A call for view contributing to the delivery of the Government’s Strategy for achieving Officially Bovine Tuberculosis Free (OTF) status for England

30 August 2016
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1. **Purpose of the call for views**

1.1 This call for views is a precursor to possible full consultation on proposals to simplify the TB testing regime in the High Risk Area (HRA) of England. The Government’s view is that there is potential disease control and practical merit in such simplification but acknowledges that there will be impacts, positive and negative, on some cattle herd owners. So we want to hear your views, which will influence whether, or not, further work is carried out with a view to formal consultation later in 2017.

2. **How this call for views fits with the parallel consultation on Enhanced bovine TB surveillance and controls in the High Risk and Edge Areas of England**

2.1 This call for views has been published in parallel to the latest consultation exercise aimed at introducing sensible, proportionate and affordable TB control measures in cattle. That consultation includes specific proposals for enhancing the TB eradication strategy through more sensitive testing of cattle from TB breakdown herds, including in the HRA.

2.2 We would urge consultees to read and respond to the consultation and this call for views. The two documents are not contradictory in that the proposals set out in the sister consultation are measures that the Government is minded to introduce over the coming 12 months, whereas this call for views is merely an invitation to help us to determine whether or not there is merit in developing and analysing further proposals for a simpler and more effective TB testing regime in the HRA – built around a default position of six-monthly routine surveillance testing until disease situation improves in an area or a herd.

3. **Background**

3.1 The ambitious target of achieving OTF status for the whole of England by 2038 requires that further cattle controls are rolled out alongside the extension of badger control. We have made progress on the introduction of enhanced cattle controls and the parallel consultation exercise to this call for views includes other measures that the Government is minded to introduce.

3.2 The gradual introduction of new cattle controls, combined with the rigorous testing regimes for herds that are contiguous to TB breakdowns, cattle traced from other infected herds, check tests and various other risk-based testing arrangements already in place, has already resulted in a complex TB testing landscape.
3.3 The Government’s view is that the alternative regime set out below would have a positive impact on disease control and that rationalisation of TB herd tests - making them simple, consistent and predictable for keepers, official veterinarians, private vets and the Government’s own staff - could be a positive move. The alternative regime could help cattle businesses to cope more easily with the demands of TB testing and help the Government to make better use of its resources for tackling the bovine TB epidemic. The proposal is to apply this regime in a risk-based manner (see below) until disease benefits are observed, returning to an annual surveillance regime, once disease control impacts have been established.

3.4 We have already applied six-monthly surveillance testing in herds in Cheshire Edge area where bTB incidence is as high as in some part of the HRA and are seeing early signs of this more frequent surveillance having a positive impact on disease: declining incidence and prevalence, as we are finding disease earlier and preventing the movement of infected cattle. Furthermore, the regime has been well-tolerated by cattle keepers in Cheshire. One of the proposals in the parallel consultation involves rolling out six monthly surveillance testing in the higher TB incidence counties of the Edge Area that adjoin the HRA.

4. Our outline of a simplified TB testing regime in the HRA

4.1 We want your views on possible replacement of the current complex testing regime - that is otherwise likely to get even more complex over time - with a risk based regime.

4.2 The simplified regime would involve:

Default six-monthly surveillance testing, with some flexibility around timing to reflect keepers’ business operations

Annual testing in herds which are deemed to be low risk, based on criteria such as local epidemiological situation, the herd TB history, purchasing record and/or CHeCS herd accreditation

Replacement of 60-day Short Interval Tests by three-monthly testing in TB breakdown herds
Adjustment of testing windows for most risk based tests, such as contiguous, post breakdown check tests and trace tests, to reduce the need for these tests outside the six-monthly testing routine.

Maintenance of pre-movement testing requirements.

5. Potential benefits

5.1 The Government’s view is that the simplified regime could deliver the following benefits:

- Earlier detection of infection in non-restricted herds and prevention of subsequent movement of potentially infected cattle.
- Potential improvement in the sensitivity of TB breakdown testing, as intervals between tests are increased from 60 days to 90 days (the current average Short Interval Test interval is 78 days), and the de-sensitising effect of repeat tuberculin injections at short intervals is minimised.
- Empowerment of cattle keepers to plan their TB testing to suit their business needs, confident that they won’t be surprised by the need for additional, unexpected tests at short notice.
- Earned recognition, in the form of annual testing, for keepers who take steps to reduce the risk of TB affecting their herds.
- More efficient TB testing, as the number of partial herd tests are reduced.
- No need for separate six- and twelve-month check tests following withdrawal of TB breakdown movement restrictions. Such tests would be replaced by the next scheduled six monthly herd test.
- No need for contiguous testing of herds subject to six-monthly testing, on the basis that the next scheduled test will provide adequate early detection of disease.
- A big reduction in the need for separate tracing tests, with purchasers of high risk purchased animals notified and advised to isolate and/or privately test such animals if no herd test is imminent.
- A saving in Government TB testing costs that can be used to support other aspects of the TB programme.

6. Potential costs

6.1 The Government’s does, however, acknowledge that additional TB testing for TB free herds will impose additional direct costs on herd owners. We also envisage that there would be increased seasonal demand for Official Veterinarians to carry out TB tests on herds that are grazed.
7. **Tell us what you think**

7.1 If you wish to respond to this call for views, please submit your comments by **8 November 2016**.

7.2 You can respond in one of three ways.


- **Email** to bTBengage@defra.gsi.gov.uk

- **Post** to:
  
  Defra  
  Cattle Measures Team  
  Area 5D, Nobel House  
  17 Smith Square  
  London SW1P 3JR

7.3 Our preferred method is online because it is the fastest and most cost-effective way for us to collate, analyse and summarise responses. If you require a different format please let us know.

7.4 Given our obligations under the Freedom of Information Act and the Environmental Information Regulations, the responses we receive may be published. If you do not wish to be identified as the author of your response, please state this clearly.

7.5 Final decisions on next steps will be made by Ministers.