

# **Consultation on the Department's Response to the TB Strategic Partnership Group's Recommendations to Eradicate Bovine Tuberculosis (bTB) in Northern Ireland**

## **Summary of Responses**

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**Annex 1 – List of Respondents**

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**Copies of this summary may be requested as follows:**

By post:

TB & Brucellosis Policy Branch  
Department of Agriculture, Environment and Rural Affairs  
Room 714  
Dundonald House  
Upper Newtownards Road  
Ballymiscaw  
BELFAST  
BT4 3SB

By telephone: 028 9052 4828

By e-mail: [TBBR.Policybranch@daera-ni.gov.uk](mailto:TBBR.Policybranch@daera-ni.gov.uk)

This summary can also be accessed at the Department's website;

<http://www.daera-ni.gov.uk/sites/default/files/consultations>

## 1.0 Introduction

Following the provision of legal advice from the Departmental Solicitor's Office (DSO) in August 2017, the Department of Agriculture, Environment and Rural Affairs' (DAERA) Permanent Secretary gave approval for officials to issue a public consultation on the Department's proposals to eradicate bovine TB (bTB) following their detailed consideration of the TB Strategic Partnership Group's (TBSPG's) Eradication Strategy which had been published in December 2016.

The responses to the consultation have been analysed and are presented in this summary report. They will assist DAERA to provide advice to an appointed Minister.

## 2.0 Consultation Launch and Engagement with Stakeholders

The public consultation was launched on 30 November 2017 and closed on 5 February 2018.

For a copy of the consultation please follow the link below: (<https://www.daera-ni.gov.uk/consultations/bovine-tuberculosis-eradication-strategy-northern-ireland>).

A wide ranging communication strategy was put in place to raise awareness of the consultation and encourage responses. This included:

- press releases;
- publication of the consultation on the Department's website and on Citizen Space;
- post or e-mail contact with all stakeholders on Departmental consultation lists; and
- facilitation of meeting requests with groups to discuss the proposals.

### 3.0 Summary of Consultation Responses by Thematic Area

The consultation paper sought views on the general principles of the proposed changes outlined under six key thematic areas.

A total of 200 responses were received. Table 1 shows the number of respondents identified by stakeholder category. There were no responses to the partial Regulatory Impact Assessment, Rural Needs Impact Assessment or the Equality and Human Rights Screening.

<b>Stakeholder Category</b>	<b>No.</b>
Academic or Researcher	7
Breeders Associations / Society	6
Community Group	2
Elected Representative	3
Environmental Non-Governmental Organisation	13
Farmer / Agricultural Worker	30
Farming Union / Association	4
General Public	101
Local Government	2
Other	14
Other Business	1
Other Non-Government Organisation	7
Professional / Business Association / Trade Body	8
Veterinarian / Veterinary Worker	2

A list of respondents who agreed to the publication of their details is detailed in Annex 1. The details of 21 respondents have been omitted at their request.

The following sub-sections provide an overview of the main views reflected in the responses. The questions related to each thematic section are reproduced at the start of each summary.

It should be noted that they are not intended to be a comprehensive report on every view expressed, but rather a broad summary of the key views submitted by respondents.

A glossary of terms is provided at Annex 2.

### **3.1 New Approach to Management, Oversight, and Partnership Working**

A total of 138 out of 200 respondents answered one or more of the three questions in this section.

**G1:** Do you agree with the proposal for new partnership structures to oversee the bTB Programme and to help both stakeholders and government work together to eradicate the disease?

**G2:** Do you agree with the three tiered approach at a national, regional and local level?

**G3:** Do you agree with the membership of each tier as proposed?

The responses may be summarised as follows:

- (a) A majority of respondents were content with the three tier approach and membership of each respective governance tier.
- (b) The farming industry emphasised a need to ensure representatives carry weight and authority to influence and take organisations with them.

- (c) The Ulster Farmers' Union (UFU) was concerned that DAERA would only select farmers who aligned with a Departmental view. It suggested that democratic farming bodies should be able to elect members to the TB Eradication Partnership (TBEP) and questioned the inclusion of a scientist as opposed to an additional farmer.
- (d) The National Trust and the Council for Nature Conservation and the Countryside (CNCC) requested that a social sciences expert should be on the TBEP.
- (e) The Association of Veterinary Surgeons Practising in Northern Ireland (AVSPNI) indicated opposition as they considered that the TBEP could become a talking shop with not enough governance. It responded that there should be one Regional Eradication Partnership (REP) for each Divisional Veterinary Office (DVO) and suggested that more veterinary experience was required in the structures at every level.
- (f) The lack of remuneration below the TBEP level was also criticised by a number of respondents.
- (g) The Democratic Unionist Party (DUP) suggested that perhaps the REP level of the model should be dropped, feeling that potentially it might be too complex. The Ulster Unionist Party (UUP) outlined that there needs to be joined up approach and cautioned against too much bureaucracy.
- (h) Some respondents expressed caution against complexity, creating too much bureaucracy and appealed for clear lines of communication.

### **3.2 Tools and Processes**

A total of 108 out of 200 respondents answered one or more of the ten questions in this section.

**T1:** Do you agree that there should be a mandatory requirement for herd-keepers to have their animals undergo gamma interferon testing where

DAERA considers it necessary and that all animals which test positive to the gamma interferon test should be removed?

The responses may be summarised as follows:

- (a) There was a high level of support for this proposal amongst all respondents.
- (b) The UFU, Breeders Associations and Veterinary Associations were in favour of this proposal and accepted that this would lead to increased detection. Some respondents, particularly the UFU, asked for clarity on the criteria to be used.
- (c) The CNCC, while supporting this proposal, stated that the use of Gamma interferon test (IFNG) will create a spike of reactors, only some of which will be positive for bTB. This was also a shared view among the ten respondents who were not supportive of this proposal.
- (d) The DUP was broadly supportive, while the UUP queried the capacity that exists to carry out IFNG testing and the costs associated with this test. Sinn Féin has outlined that it is supportive of the general principles throughout the consultation. Sinn Féin further recommends that an all-Ireland approach is taken to eradicating bTB, that focus groups are conducted with relevant stakeholders and raises a concern at the time it will take to see impacts from the proposals.
- (e) Those respondents answering this question directly and identifying as Farmers/Agricultural Workers were not supportive due to the potential for an increase in reactors.

**T2:** Do you agree that 'chronic herds' should be recognised as a distinct entity for action and that there should be a renewed approach to dealing with chronic herds as outlined, based on the likelihood that intervention will have a positive impact?

The responses may be summarised as follows:

- (a) The UFU disagreed with this proposal, did not support the use of the term 'chronic herd' and the public labelling of individual farms as such.
- (b) The breeders associations were in favour but made a comment that the consultation paper did not effectively address the issue of herds that are continually infected.
- (c) Other farming representatives, conservationist organisations and farmers/agricultural workers were in favour of this proposal.
- (d) The use of this terminology was also raised by the UUP who felt that it would have a detrimental effect. The DUP asked for better guidance for farmers and Sinn Féin stated that it was generally supportive of the general principles within the consultation.
- (e) There were a number of comments regarding the definition of 'chronic herd' with some respondents suggesting using the Welsh Government's definition to provide clarity.
- (f) Of the 69 respondents identifying as "Other", 62 support this proposal.

**T3:** Do you agree that the Department should introduce measures to prevent restocking of breakdown herds through a phased approach?

**T4:** Do you agree that the Department should introduce an interim transition stage where no movements will be permitted following a bTB breakdown until at least one further herd test has been completed and reactors have been removed?

**T5:** Do you agree that, in the medium-term, the Department should prevent restocking of herds that do not test clear at the first retest (subject to epidemiological assessment?)

**T6:** Do you agree that, in the long-term, the Department should require a negative full herd test before allowing movement on to a farm following any disclosure episode?



The responses may be summarised as follows:

- (a) While there was broad level of agreement to the proposals from a majority of respondents who answered this section, there were very specific comments and suggestions raised by a number of key stakeholders and individuals who responded.
- (b) Among the farming and agri-food industries, the UFU expressed concern around implementation of this policy and the financial impact on affected businesses and urged caution. The UFU was against the proposal for the beef sector as they considered that it would have an adverse impact on store cattle and beef rearing producers. It was, however, in favour of the proposal for dairy herds as it recognised that although there would be cash flow concerns, the proposal increased the likelihood of removing bTB from the herd. It was made clear support for this proposal in relation to dairy herds, where the hope was to remove bTB from the herd as quickly as possible, was only for the proposal relating to restocking after one herd test, regardless of the herd test result.
- (c) The breeders associations commented that there must be scientific evidence and adequate monitoring to demonstrate that herds are not at an increased risk of infection. They also commented that EU legislation must be adhered to and that DAERA is bound to implement the existing legislation.
- (d) The Livestock and Meat Commission (LMC) disagreed with this proposal, stating that the beef supply chain and especially large beef finishers will suffer disproportionately from the introduction of restocking restrictions.
- (e) The AVSPNI referred to EU Legislation (Council Directive 78/52/EEC) which prohibits movement into a breakdown herd. It expressed concern that the concept is being advanced at the same time as proposals to reduce compensation and believe that implementing the two measures simultaneously would greatly increase the impact on the incomes of farmers whose herds are under restriction.
- (f) The British Veterinary Association NI (BVANI) and British Cattle Veterinary Association (BCVA) had concerns around restocking herds which have lost their Officially Tuberculosis Free (OTF) status and felt that any policy should

also consider the impact of restrictions to restocking on the viability of many farms, particularly dairy farms. Both also asked for clarification behind the rationale of a phased approach and what the Department considers to be the short, medium and long-term. They felt that introducing changes in three separate stages will further complicate the process and introduce confusion for farmers, veterinary surgeons and other stakeholders.

- (g) Conservationist organisations felt this should help to reduce the spread of the disease, however, careful consideration should be given to how this would be implemented due to the potential for serious hardship to a farm business and the potential impact on important habitats that are currently grazed – where limiting herd numbers could lead to under-grazing.
- (h) The NI Environment Link (NIEL) and Ulster Wildlife Trust (UWT) stated that any actions that will limit the potential for cattle to cattle infection through undetected animals is welcomed. The CNCC stressed the need for farms to receive the necessary advice and support.
- (i) The DUP approved of the general direction of the policy (T1) but not on the specifics of what was being proposed and urged more flexibility. It stated that this policy if implemented in the phased approach as outlined would prevent beef finishing herds from continuing to operate. The UUP felt that the Department should explain more fully the measures being proposed and queried its impact on disease control. It also raised the issue that preventing restocking of breakdown reduces milk output in dairy farms.
- (j) Those identifying as Farmers/Agricultural Workers were in favour, stating that introducing new animals into the herd before a clear test puts these animals at risk of infection. However, although agreeing with the proposal, there were also comments on mitigating any potential adverse impact to the farm business; and
- (k) A majority of those who responded and identifying in the ‘other’ respondents category were in favour of the proposals **T3-T6**.

**T7:** Do you agree that moves should be permitted from bTB breakdown herds to approved rearing/finishing herds which are 100% housed and which meet defined, strict biosecurity conditions?

The responses may be summarised as follows:

- (a) The UFU, breeders associations, veterinary associations, elected representatives and other respondents were generally in favour of this proposal. It was felt that this would enable farmers to cope better in the event of a breakdown and they would not have to face the added costs associated with stocking density issues, increased fodder costs and slurry storage.
- (b) The UFU, breeders associations, veterinary associations, elected representatives and other respondents stated that the main issues of concern appeared to be the costs involved and the conditions required for such units to become operational. The breeders associations mentioned the fact that there was a similar proposal in the past but the criteria were so stringent that no-one applied. They would like to see funding made available to enable farmers to meet the criteria.
- (c) Conservationists supported this proposal with similar comments regarding regulation of such units, biosecurity requirements and the need for animal movement to be strictly controlled.
- (d) Most respondents emphasised the need for strict biosecurity controls when transporting animals from the farm of origin to the rearing/finishing unit.
- (e) All political parties who provided a response supported this proposal.

**T8:** Do you agree that legislation should be introduced to authorise Private Veterinary Practitioners (PVPs) to apply DNA tags to reactors when reading the test?

The responses may be summarised as follows:

- (a) The UFU and breeders associations agreed that DNA tagging at reactor disclosure would enhance the continuity of reactor identification and reduce the possibility of fraud within the industry.
- (b) The veterinary associations supported the introduction of DNA tagging of positive reactors and agreed with the proposal to change legislation to enable PVPs to apply DNA tags, provision for which, is included in the existing bTB testing contract.
- (c) Conservationists supported this proposal.
- (d) Sinn Féin outlined its agreement with the broad principles of the consultation and the DUP highlighted its support for this proposal. The UUP stated that attention must be paid to the cost of DNA tagging and it must only be implemented at the farmers' discretion.
- (e) Three respondents who recorded disagreement with the proposal provided no comments to explain why they disagreed.

**T9:** Do you agree that, in the event that the pilot scheme demonstrates that there is value in doing so, the Department should undertake reactor quality assurance checks as appropriate?

The responses may be summarised as follows:

- (a) The UFU and breeders associations commented that there is very little evidence of fraud but they were supportive of audit measures that may reduce or prevent fraud.
- (b) The AVSPNI and the BVANI would prefer to await the findings of the pilot scheme that is currently under way before providing comment.
- (c) Conservationists recognised that quality assurance measures should be integral to tools and processes.
- (d) The UUP stated that an assessment should be carried out to see if it is viable and productive to do so. The DUP stated that action should be taken to remove

all cases of fraud with the test. Sinn Féin was generally supportive of this proposal.

- (e) Those identifying as Farmers/Agricultural Workers agreed with this proposal.
- (f) Those respondents who disagreed with the proposal cited cost as the main factor.

**T10:** Do you agree that the Department should expand the use of molecular techniques in order to support its strategy to eradicate bTB?

The responses may be summarised as follows:

- (a) The farming and agri-food industries including the UFU and breeders associations supported continuing to strengthen this evidence base to justify eradicating bTB in both the cattle and wildlife reservoir as they stated the science to date has not been sufficient to find agreement between farmers and conservationist NGOs on the issue.
- (b) The veterinary associations supported this proposal, with the AVSPNI stating that the Department should make the fullest possible use of the considerable local expertise available in molecular techniques. It would like to see research into molecular techniques given a high financial priority and felt that it will provide useful information on the epidemiology of the disease, which will provide useful evidence on which to make decisions in future.
- (c) Conservationists supported this research as they felt it could provide evidence of the vectors of spread of the disease, give evidence of directional spread and indicate timelines.
- (d) The UUP stated that any attempt to better understand the epidemiological basis of bTB which will ultimately lead to the eradication of bTB must be welcomed. However, it must not be the sole focus of the Department.

### 3.3 Wildlife

A total of 195 (97.5%) out of 200 respondents answered one or more of the five questions in this section.

**W1:** Do you agree with the Department's proposals for wildlife intervention, that is, culling in a central zone, and complementary actions to mitigate perturbation or re-infection as appropriate?

The responses may be summarised as follows:

- (a) The UFU, Dairy UK (Northern Ireland), Animal Health and Welfare NI (AHWNI), Royal Ulster Agricultural Society (RUAS) and LMC were supportive of the proposals.
- (b) Farmers for Action (FFA), the National Beef Association (NBA) and Pedigree Cattle Trust (PCT) did not support the proposals, expressing the latter's position as their agreed view. Their shared response stated that the current proposals were rooted in inadequate research; the real question was how to identify infected animals. They felt such a process of identification could be easily established and thereafter there should be a cull of all infected badger setts.
- (c) The UUP expressed qualified support for the proposals subject to complementary actions by the Department to receive buy-in from farmers through the new proposed governance structures while the DUP and Sinn Féin generally supported the proposal.
- (d) AVSPNI were supportive of the proposal. BVANI expressed qualified support for the proposal, subject to a subsequent and more detailed consultation once proposals have been developed by the Department.
- (e) Farmers and agricultural workers expressed wide-ranging views including enhanced bio-security, vaccination only and the non-removal of healthy badgers with a slight majority of respondents supporting the proposal.

- (f) The UWT, National Trust, NIEL, CNCC, Badger Trust, International Fund for Animal Welfare (IFAW), Eurobadger, Northern Ireland Badger Group and the Woodland Trust did not support the proposals. The League against Cruel Sports, the Ulster Society for the Protection of Cruelty to Animals (USPCA), Northern Ireland says NO to Animal Cruelty and the Humane Society International/UK also did not support the proposal.
- (g) The general public expressed strong opposition to the proposal (with a number of respondents stating their support for UWTs position.)
- (h) Academics/researchers expressed very strong opposition to this proposal with many respondents making substantial arguments against culling, generally favouring a vaccination only or Test, Vaccinate or Remove (TVR) type approach.

**W2:** Do you agree with the TBSPG's and Department's assessment that stand-alone vaccination is better utilised as part of a longer-term badger intervention strategy?

The responses may be summarised as follows:

- (a) The farming and agri-food industries, AHWNI, RUAS and LMC were supportive of the proposal. There was qualified support from the UFU for the use of vaccination as part of the longer-term badger intervention strategy, provided such measures deliver a more cost effective means of eradicating bTB in the wildlife reservoir. Farmers and agricultural workers expressed strong support for the proposal. Dairy UK (NI), FFA, the NBA and PCT did not support the proposal with similar comments to those outlined in W1.
- (b) The AVSPNI did not support the proposal; however the BVANI expressed qualified support subject to a subsequent and more detailed consultation being published once proposals have been developed by the Department.

- (c) The DUP and UUP expressed qualified support subject to an appropriate scientific evidence base supporting vaccination as the best option. Sinn Féin expressed support for the general principles within the consultation.
- (d) The CNCC, Badger Trust, IFAW, Eurobadger, Northern Ireland Badger Group and the Woodland Trust did not support the proposal. The League against Cruel Sports, USPCA, Northern Ireland says NO to Animal Cruelty and the Humane Society International/UK also did not support the proposal.
- (e) Members of the general public expressed mixed views on the proposal, however a certain level of misinterpretation of the proposal could be interpreted because supporters of *vaccination only* as an approach answered “Yes” to this question. The majority of respondents were not supportive of vaccination as part of a longer-term strategy with most supporting *vaccination only* as the only appropriate future badger intervention.
- (f) Among academics/researchers, mixed views were also expressed on the proposal which may indicate a certain level of misinterpretation of the meaning of this question e.g. advocates of *vaccination only* or a selective removal intervention (TVR) approach sometimes answered “Yes”. The main views expressed were supportive of selective removal or a *vaccination only* approach.

**W3:** Do you agree that vaccination is better utilised in combination with badger removal to first reduce infection in badgers in the short-term?

The responses may be summarised as follows:

- (a) The UFU, Dairy UK (NI), AHWNI, RUAS, and the LMC were supportive of the proposal. The FFA, NBA and PCT did not support the proposal.
- (b) The USPCA and Northern Ireland says NO to Animal Cruelty supported the proposal. The UWT and NIEL expressed qualified support for the proposal on the basis that no healthy badgers should be culled as part of any wildlife intervention strategy and that humane and responsible euthanasia of badgers with confirmed advanced bTB was undertaken. The National Trust, CNCC,



Badger Trust, IFAW, Eurobadger, Northern Ireland Badger Group and the Woodland Trust did not support the proposal. The League against Cruel Sports and Humane Society International/UK did not support the proposals.

- (c) The BVANI also expressed qualified support, subject to a subsequent and more detailed consultation once proposals have been developed by the Department. The AVSPNI did not support the proposal.
- (d) The DUP and Sinn Féin were supportive of the proposals. The UUP stated that there was little confidence amongst many farmers that *vaccination only* would in fact work and further work needed to be done to sell the idea of vaccination to the farming community. They also stated that culling at this time seems to be the only effective methodology which is proving to eradicate/control bTB and the introduction of any vaccination (whether that be for badgers or cattle) may be hampered and delayed by current EU regulations.
- (e) The views of farmers and agricultural workers reflected general support for the proposal with some mixed and widely differing views i.e. full support for the removal of badgers by any method **or** opposition in favour of vaccination only as the appropriate intervention.
- (f) Academics/researchers expressed very strong opposition to the proposal, while members of the general public expressed strong opposition to the proposal with a majority not being supportive of the proposed approach. Overall, most were supportive of *vaccination only*, oral bait vaccine development and a TVR approach.

**W4:** Do you agree that the role that other species might play in the spread of bTB to cattle should be kept under review and that further research should be carried out if resources allow?

A total of 117 of all respondents answered this question directly with 106 respondents (**90.5%**) indicating their support for this proposal.

The responses may be summarised as follows:

- (a) The UFU, Dairy UK (NI), AHWNI, and LMC were supportive of the proposal, as were the AVSPNI and BVANI. The RUAS expressed qualified support only if it meant there was no reduction in the resources applied to the badger issue or if it would distract from same.
- (b) The UWT, National Trust, NIEL, CNCC, Badger Trust, IFAW, Eurobadger Northern Ireland Badger Group and Woodland Trust expressed support for the proposal as did the League against Cruel Sports, USPCA, Northern Ireland says NO to Animal Cruelty and the Humane Society International/UK.
- (c) The general public expressed strong support for the proposal (although a few responses clarified their view that bTB was a cattle disease and “*nothing to do*” with badgers); whilst academics/researchers expressed very strong support. Many farmers and agricultural workers also expressed strong support for the proposal.
- (d) The DUP, UUP, and Sinn Féin were supportive of the proposal.

**W5:** Do you agree that there is merit in continuing, expanding and enhancing the badger RTA Survey?

The responses may be summarised as follows:

- (a) The UFU, Dairy UK (NI) and AHWNI supported the proposal. The LMC expressed qualified support for the proposal. The LMC stated that it was only worth doing if the results were going to be able to be used to inform future strategy. The RUAS, FFA, NBA and PCT did not support the proposal.
- (b) The AVSPNI and BVANI supported the proposal.
- (c) Ulster Wildlife, the National Trust, NIEL, CNCC, Badger Trust, IFAW, Eurobadger, Northern Ireland Badger Group, and the Woodland Trust supported the proposal. The League against Cruel Sports, USPCA and Northern Ireland says NO to Animal Cruelty also supported the proposal. The Humane Society International/UK did not support the proposal.

- (d) The DUP and Sinn Féin were generally supportive of the proposal. The UUP expressed qualified support for the proposal subject to the Department making clear and sound costings of all such research, allowing local farmers and industry representatives to buy into it.
- (e) The general public expressed strong support for continuing, expanding and enhancing the badger RTA Survey. Academics/researchers expressed strong support for the proposal although one respondent disagreed and recommended that resources should be directed to other areas.
- (f) Many farmers and agricultural workers expressed broad support for the proposal but a small number of respondents disagreed with it suggesting it wasn't the best use of public resources.

### **3.4 Preventing Disease -Herd Health Management**

A total of 110 out of 200 respondents answered one or more of the three questions in this section.

**H1:** Do you agree that Statutory Improvement Notices should be used where it is shown that good herd health management is not being applied and is creating a risk to other neighbouring herds despite advice being provided?

The responses may be summarised as follows:

- (a) The UFU stated that there are instances where a Statutory Improvement Notice (SIN) would be beneficial to improve bio-containment of bTB on a breakdown farm. It suggested that SINS should only be issued as a last resort and only on request from a local Disease Response Team (DRT), demonstrating a partnership approach and DRTs and local farmers would be more actively involved in local bTB control.
- (b) Other farming Industry representatives felt that SINS are a piecemeal approach to encourage biosecurity measures. They stated that the Department should

employ the services of a Behavioural Insight Team to create a strategy with the objective of improving biosecurity measures deployed by farmers.

- (c) AVSPNI viewed the use of SINs to be a strategy of last resort when all other avenues have been explored to no avail. It saw a role for REPs or DRTs in the use of SINs to foster greater ownership of the eradication programme and shared responsibility.
- (d) BVANI supported the use of SINs and suggested that the model used by the Welsh Government, of reducing compensation should farmers continue with unacceptable high-risk practices or if they fail to adopt recommendations within 'improvement notices,' should be considered.
- (e) CNCC indicated that the availability of SINs would be an important tool in cases where all other advice and support to a farmer has not resulted in improved herd health management. Furthermore, CNCC recognised that supporting farmers to improve and optimise their herd management and biosecurity will be a critical element of disease eradication.
- (f) NIEL and UWT were generally supportive of the proposal but saw the introduction of SINs as a last resort.
- (g) The DUP agreed with the proposal with the UUP stating that SINs should be a last resort with better biosecurity training for farmers required. Sinn Féin agreed with the general principles behind the consultation proposals.

**H2:** Do you agree that herd-keepers should be proactively encouraged to improve herd health management and take responsibility for herd health management on individual holdings?

The responses may be summarised as follows:

- (a) There was a high level of agreement across all key sectors and respondents for this proposal.
- (b) Representatives of the farming industry, UFU, Dairy UK (NI) and LMC agreed with the proposal and stated that all farming businesses should operate at least

minimal standards and requirements. The LMC highlighted that the Farm Assurance Schemes already encouraged such practices.

- (c) Conservationists were also in broad agreement, suggesting that the Farm Business Improvement grants could continue to provide support for biosecurity measures.
- (d) The UUP believed that this should be a priority and that there needs to be a greater role for industry representatives, such as the UFU in the promotion of the biosecurity message. The DUP and Sinn Féin agreed with the proposal.

**H3:** Do you agree that the farming industry should lead in the adoption of an ‘informed purchasing’ approach for farmers bringing in stock to their farms?

The responses may be summarised as follows:

- (a) In general the farming industry representatives all agreed that an informed purchasing policy system which is simple enough to allow herd owners to quickly assess any infection risks associated with the animal, would be beneficial. Comments included the need for the proposals to be subject to careful consideration and that they should be the subject of further consultation, particularly in relation to Data Protection issues.
- (b) The veterinary associations agreed that an “informed purchasing” approach is the gold standard for buying-in livestock which should ultimately be adopted throughout the farming industry. The BVANI suggested that the Cattle Health Certification Standards (CHeCS) scheme is a useful model for consideration.
- (c) The Badger Trust stated that informed purchasing is a vital tool in preventing the spread of disease between herds and should be mandatory. The UWT believed that this is something on which the industry and the Department should form a view.

- (d) Sinn Féin and the DUP were generally in agreement with the proposal. The UUP stated that it agreed “in principle” but outlined that in order for an effective strategy to eradicate bTB there needed to be a total industry-wide buy-in.

**H4:** Do you agree that segregation notices should be introduced to protect those herds that are at risk of disease spread from high-risk groups within bTB breakdown herds?

The responses may be summarised as follows:

- (a) The UFU was opposed to the introduction of segregation notices in the current proposal but were keen to work with DAERA on the wording of segregation notices to find a practical solution that confers some disease mitigation benefits to OTF herds, while not making it impossible to farm for Officially Tuberculosis free Suspended (OTS) / Officially Tuberculosis free Withdrawn (OTW) herds.
- (b) Dairy UK (NI) and the LMC supported the proposal on a risk based, case by case basis but stressed that this should not be to the detriment of the farm business and particularly animal welfare in circumstances such as limited fodder availability. They believed that was an important tool in overall risk mitigation within a geographical area.
- (c) The NI Charolais Club, PCT and NBA agreed that the Department should work with farmers to develop and introduce segregation notices to protect herds at risk of disease spread but emphasised that such notices must be based on sound scientific principles which have established how disease spreads from infected animals.
- (d) AHWNI indicated that whilst supportive of the principle, prior to any measure being adopted, that a review of the likely impact of farm fragmentation on bTB transmission dynamics should be undertaken so that any measures adopted are proportionate to the risks identified.

- (e) The AVSPNI welcomed the Department's offer to work with the farming industry to 'develop and introduce' this proposal but felt that PVPs should also be included. The BVANI also agreed with the proposal.
- (f) Conservationists including UWT and NIEL were supportive, commenting that every effort should be made to reduce the risk of infection transmission to uninfected cattle or wildlife. The Born Free Foundation felt that the segregation of high risk groups of cattle is a measure that should help but cautioned that the practicalities need to be considered to avoid any issues of over-stocking or animal welfare.
- (g) The UUP felt that this may be difficult to implement with farm fragmentation and conacre and called for more clarity. The DUP was opposed to the proposal on the basis that it would be premature to bring it in at this stage; however it should be considered after there has been a significant reduction in the level of disease. Sinn Féin was generally supportive of the 'general principles' outlined in the consultation report.

**H5:** Do you agree with the Department's assessment that, given the high levels of bTB within Northern Ireland, it is not currently feasible to introduce herd classification and purchasing based on herd bTB history?

The responses may be summarised as follows:

- (a) The UFU agreed with the proposal and was not in favour of a herd classification system at this stage. It stated that the creation of such a herd classification system would create intolerable trading conditions for farmers.
- (b) The NI Charolais Club, PCT and NBA supported the proposal as did Dairy UK who wished to see the criteria under which such a system could be considered.
- (c) AVSPNI and BVANI agreed that this is currently not practical. They supported the principle of an industry led risk-based trading system and that herd classification should be a long-term goal, subject to appropriate consultation

with stakeholders and industry once the incidence of bTB has been much reduced.

- (d) AHWNI indicated that this is likely to have a disproportionate effect on the NI cattle industry.
- (e) Conservationists generally recommended that herd classification and purchasing should be introduced as quickly as possible stating that risk-based trading could be an important element of combatting bTB as it will further incentivise good herd health management. UWT and NIEL were of the opinion that it should be considered even in the medium-term.
- (f) The DUP stated that herd classification and purchasing could be introduced if/when the disease has reduced to a very low level in Northern Ireland. The UUP stated that it would be completely unfeasible to introduce classification at this time. Sinn Féin was generally supportive of the general principles outlined in the consultation report.
- (g) The general public had a mixed response. Most individual respondents who disagreed with this question stated that herd classification and purchasing should be introduced as soon as is practicable.

**H6:** Do you agree with the Department's assessment that industry, with support, should proactively encourage farmers to select bTB resistance in the selection of breeding material?

The responses may be summarised as follows:

- (a) The farming and agri-food bodies generally supported this proposal, agreeing that the Department should pro-actively encourage farmers in selection of bTB resistance.
- (b) Suggestions were made that the Department should establish a working group to design a programme with all stakeholders to promote and implement the



results of genetic research and genetic evaluation as a matter of urgency and part of that programme would be a review of bTB resistance.

- (c) AHWNI indicated that selection for resistance to bTB should be encouraged; however it also felt that it is important that this is framed within the context of a programme of bTB controls.
- (d) AVSPNI and the BVANI agreed with the principle that the farming industry should encourage farmers to select bTB resistance in their breeding stock. They see this as another element of informed purchasing; however they were not convinced that enough sufficiently robust data is available to enable herd-keepers to make informed choices of this nature at this time. They would encourage the Department to organise and fund further research into the genetic basis of bTB resistance.
- (e) Conservationists in general supported the principle. The UWT suggested that consideration should be given to some form of grant-aid to help farm businesses to improve. The National Trust and CNCC stated that supporting farmers to improve and optimise their herd management and biosecurity will be a critical element of disease eradication.
- (f) Elected representatives supported this proposal with the UUP stating that while it believed there was a degree of merit in the proposal, that the industry and all relevant stakeholders need to be brought along and cannot be left behind.

**H7:** Do you agree that industry should have a lead role to play ensuring that the legislative requirement, to clean and disinfect vehicles each time they are used to transport animals, is met?

The responses may be summarised as follows:

- (a) The UFU and Dairy UK were supportive of industry playing a key role. The NI Charolais Club, PCT and NBA also agreed but indicated that it is their view that behavioural science should play a part in such a programme. The breeders associations highlighted the need for the reintroduction of DAERA staff to cattle

markets to regulate the admission of animals which were not transported to market in clean and disinfected vehicles.

- (b) AVPSNI and the BVA also agreed with this proposal. AVSPNI highlighted that there are other vehicle-related biosecurity issues that need to be addressed such as general farm vehicle movement between fragmented holdings, movement from farm to farm of contractors' vehicles, National Fallen Stock Scheme contractors' vehicles and milk tankers in addition to the role of slurry and dung spreading.
- (c) AHWNI agreed with the proposal and stated that it should be part of a biosecurity assessment to raise the awareness of herd owners and agree practical measures which can be used to mitigate the associated risks.
- (d) Conservationists agreed with the proposals, with the USPCA stating that any legislative requirement should be fully met and steps need to be taken by the industry and the Department to ensure this is the case. They also highlighted the need for careful disposal of disinfectant and associated grey water to minimise the impact on the wider environment.
- (e) The NIEL and UWT advocated the use of random inspections e.g. at livestock markets to encourage compliance. They also suggested that training could be provided for transport operators and contractors to improve biosecurity and help minimise disease transmission.
- (f) Elected representatives were in agreement with the proposal although they acknowledged that policing this will be difficult, therefore the industry in cooperation with the Department, have an educational role.

### **3.5 Finance and Funding**

Of the 200 responses received, 130 answered one or more of the Finance and Funding questions.

- F1:** Do you agree to the principle that there should be a reduction in the compensation rate from the current level of 100% of an animal's market value?
- F2:** Do you agree that the compensation rate paid should be set at 90% of market value in year one, reducing to 75% of market value in year two, subject to the compensation cap also being applied?
- F3:** Do you agree to the principle that there should be a cap on the level of compensation paid per animal?
- F4:** Do you agree that, if a compensation cap is introduced, it should be set at £1,500 for a non-pedigree animal, £1,800 for a pedigree animal and £3,500 for the removal of one pedigree stock bull per herd-keeper each year?

A number of the substantive replies answered questions F1 – F4 collectively, therefore the synopsis of responses also addresses these questions collectively.

The responses may be summarised as follows:

- (a) The UFU, PCT, Breed Associations, NBA, Dairy UK, and LMC did not support these proposals.
- (b) These respondents outlined a number of reasons including, but not limited to, the view that the Department has failed to address bTB in the wildlife reservoir; that herd-keepers already shoulder significant costs associated with the bTB programme that are not reflected in compensation; that caps would disproportionately impact pedigree breeders, that the proposals would exacerbate the risks posed by Brexit and may lead to hiding reactor animals.
- (c) AVSPNI and BVANI did not support the proposals. They outlined that if an animal is compulsorily slaughtered for disease control, compensation should be

paid. They outlined that the proposals do not encourage cooperation between the industry and the Department and that compensation for reactor animals does not alleviate the hardship caused by animal movement restrictions. The BVANI outlined that it supports the principle of a reduction in compensation where there is a lack of compliance on the part of the keeper with statutory disease control or accepted best biosecurity practice.

- (d) While there was some support for the proposals from conservationist organisations, a number also outlined that they considered the actual rate of reductions and/or cap value as a matter for the industry and the Department. Many also created a connection between compensation arrangements and compliance, herd health and biosecurity. The UWT and NIEL also proposed an alternative scheme that would, in the first instance, focus on training and support for bTB affected farms.
- (e) Both the UUP and DUP opposed these proposals outlining that there needs to be progress in disease rates and the wildlife reservoir. The UUP stated that the proposals could result in the farming community losing confidence in the Department's approach to bTB. Sinn Féin was broadly in support of the recommendations but stated that it would be essential for appropriate consideration to be given to ways of engaging with farmers regarding these proposals.
- (f) Those identifying as the general public, for the most part, supported these proposals. A number of respondents also linked their responses to herd health and bio-security.
- (g) Respondents identifying themselves as academic or researchers broadly agreed with these proposals.

**F5:** Do you agree with the Department's approach to keep the introduction of a specific levy for the bTB programme under review but not to introduce one at this time?

The responses may be summarised as follows:

- (a) There were mixed responses from the farming and agri-food industries/bodies. The PCT, breed societies, and NBA did not provide support for a levy. The PCT indicated that only when the Department can demonstrate transparently that its policies are bringing down the incidence of the disease in a rapid and sustained manner should consideration be given to a specific levy.
- (b) The UFU, acknowledging the competing pressures for government funds, proposed a specific levy to be paid and held by an industry body. This levy would be spent on bovine disease priorities identified by AHWNI and suggested that a levy could initially be used to focus specifically on the disease in wildlife.
- (c) The LMC and Dairy UK (NI) stated that the introduction of a levy should be based on the conditional support of the industry. The RUAS stated that, provided a multi-strand eradication strategy is implemented, a levy will receive buy-in from the industry. The RUAS also outlined that the levy must be ring-fenced to fund the strategy only and that the sums involved would justify the setting up of an independent levy board.
- (d) The BVANI agreed that a levy should continue to be considered. The AVSPNI stated that a levy as a means of contributing to the eradication of bTB would be more equitable than paying compensation below market value.
- (e) The UWT stated that, if a wildlife intervention is deemed to be necessary, they would prefer that the cost was provided by government to ensure an ethical service as the badger is a protected animal.
- (f) The UUP and DUP agreed with this proposal. The UUP stated that until meaningful progress has been made, it would not be helpful to introduce a levy. Sinn Féin broadly supported the recommendations but stated that it is essential for appropriate consideration to be given to ways of engaging with farmers regarding these proposals.

**F6:** Do you agree that each herd-keeper should pay for one herd test per year?

The responses may be summarised as follows:

- (a) The farming and agri-food bodies opposed this proposal. The majority of respondents identifying themselves as farmers or agricultural workers also disagreed with this proposal.
- (b) The BVA supported this proposal indicating that this should increase the sense of ownership of the bTB eradication strategy. The AVSPNI disagreed with this proposal, stating that it would put Northern Ireland farmers at a disadvantage to their UK counterparts. They also stated it may encourage farmers to try and reduce costs through cattle movements around testing times.
- (c) Conservationists provided a mixed response to this proposal. Some stated that it was an issue between industry and the Department, with others in agreement.
- (d) The UUP and DUP opposed this proposal. Sinn Féin broadly supported the recommendations, but stated that it is essential for appropriate consideration to be given to ways of engaging with farmers regarding these proposals.
- (e) Respondents identifying themselves as academics or researchers broadly agreed with these proposals, as did the general public.

### **3.6 Research**

A total of 146 out of 200 respondents answered one or more of the research questions.

**R1:** Do you agree that the TBEP should be recognised as a significant stakeholder in the research agenda and should be able to input into the identification of gaps and the research commissioning process?

The responses to this question may be summarised as follows:

- (a) The farming industry was very supportive and provided suggestions relating to the wider industry being involved in setting the research agenda. Others stated

that the TBEP is best placed for identifying gaps in consultation with other stakeholders.

- (b) The PCT stated that it is incumbent on DAERA to clarify how these two bodies (REPs and the TBEP) relate to DAERA and to each other, which would include the TBEP's role in commissioning research.
- (c) AHWNI suggested considering commissioning a programmatic approach to research rather than piecemeal individual research projects i.e. research programmes in epidemiology, genomics and immunology.
- (d) AVSPNI was not in agreement with this proposal and queried the premature aspect of this question. It outlined that the establishment of the TBEP is predetermined within the consultation document and stated that it is premature to make assumptions of the TBEP's worth until it is up and running with members appointed.
- (e) Conservationists were in broad agreement with this proposal. NIEL indicated that there should be two scientists on the TBEP group rather than one. It also commented that the TBEP should be tasked with scanning emerging research and ensuring best practice recommendations are embedded through the stakeholder network. The UWT, CNCC and National Trust indicated that a nature conservation specialist in badger ecology and population dynamics and a social scientist should also be involved.
- (f) The UUP was in agreement that the TBEP should have a role to play in the research agenda and stated that research has a role to play in the longer term in tackling bTB.
- (g) A range of positive general comments were received from the public, Northern Ireland Public Service Alliance (NIPSA), other businesses and academic researchers broadly indicating that bringing expertise to the research agenda is welcomed and that bTB research will benefit from input from all sectors represented on the TBEP. Additional comments also included the need for transparency.

**R2:** Do you agree that a representative(s) from the TBEP should sit in the steering group which will oversee the proposed new programme of bTB research?

The responses may be summarised as follows:

- (a) The farming industry was very supportive of this proposal and welcomed the concept of industry and government working together, networking, sharing information and bringing together multiple opinions.
- (b) AHWNI agreed with this proposal and emphasised the importance of a clear connection between the research being carried out and the implications for bTB control.
- (c) AVSPNI provided general comments which reflected its broad disagreement based on the premature establishment of the TBEP.
- (d) The National Trust and CNCC were both in agreement with this proposal and stated that this should ensure strong links and provide as wide a pool of expertise as possible. The general comments from other conservationists were all supportive and reflected the opinion that this proposal is sensible and the expertise of the TBEP is welcomed.
- (e) The UUP was in agreement with this proposal that a TBEP representative should sit on the steering group.
- (f) Other general comments were mostly supportive and included having an academic or scientist with industry links and a nature conservationist involved in the steering group.
- (g) There were a few negative comments on this proposal which suggested that research should be carried out independently and that this proposal could affect independence of research commissioning and outcomes.



## **4.0 Next Steps**

The Department wishes to thank all those who took the time to respond to the consultation proposals.

The Department is currently reviewing the responses to the proposals and working to finalise advice to a Minister, when in post, for decisions on the way forward.

DAERA officials are in discussions with the TBEP, in their role of expert advisory body to the TB Eradication Programme.

## Annex 1 – List of Respondents

Name	Organisation Name
A Gracey	
Adam Butler	
Alan McGookin	
Alison McCullagh	Fermanagh and Omagh District Council
Alison Wise	NIPSA (Northern Ireland Public Service Alliance)
Amelia Findon	British Veterinary Association
Amelia O'Reilly	
Angela McDowell	
Anita Burden	
Barclay Bell	Ulster Farmers' Union
Barrie Barr	
Bertille Jeanne	
Berwyn Clarke	PBD Biotech
Billy Chambers	
Brendan Mullan	Ulster Society for Prevention of Cruelty to Animals
Brian F Walker	Pedigree Cattle Trust (Breeders Association)
Brian Hillis	

Name	Organisation Name
Brian McGartland	NI Blonde Cattle Club (Breeders Association)
Brian Tully	
Bronwyn McGahan	Sinn Féin
Carol Robinson	
Catherine Jamison	
Charlie Weir	
Chris Roberts	
Christine Gibson	
Christopher Lambert	
Christopher Perry	
Ciaran O'Neill	
Cliff Duff	
Colin McDonald	Royal Ulster Agricultural Society
Colin Smith	Livestock and Meat Commission for Northern Ireland (LMC)
Daniel Barclay	Northern Ireland says NO to Animal Cruelty
Dave Wall	
David Gibson	Northern Ireland Blonde Cattle Club (Breeders Association)

Name	Organisation Name
David Welsh	
Desmond Burgess	
Diane Dodd's MEP	Democratic Unionist Party
Dominic Dyer	The Badger Trust
Dr Jude McCann	Rural Support
Dr Mike Johnston	Dairy UK (Northern Ireland)
Dr Sam Strain	Animal Health and Welfare NI
Dr Sinclair Mayne	Agri-Food Biosciences Institute (AFBI)
Dr. A.H.Kirkpatrick	Council for Nature Conservation and the Countryside (CNCC)
Dr.John D.McKinley	
Eileen Cassidy	Northern Ireland Agricultural Producers' Association
Eleanor Baauw	
Eleanor Short	
Ellis Kelly	NI Charolais Club (Breeders Association)
Emma Austin	
Eric Reid	Dolgan ltd
Freda Cave	

Name	Organisation Name
G McFarland	
Gala Podgornik	
Garry Wilkinson	
Gary McCartney	Countryside Alliance Ireland
Geoff Newell	
George Porter	
George Neely	
Gillian McKillop	
Gillian Steele/Robert Boyle	The Irish Moiled Cattle Society (Breeders Association)
Graham Finney	
Gráinne Mathews	The Woodland Trust
Gregor Watson	
Gwen Bennett	
Harry Marquess	
Heather Kinloch	
Helen Tully	
Hugh Casement	
Ian Morris	

Name	Organisation Name
Irene Clarke	
Ita Reynolds	None
Jackie Marrison	
Jacqueline Lockhart	
James Barrett	Drumlin Vets
James Brown	
James Dobbin	
Jane McClelland	
Janet Conlon	
Janice Samuel	
Janice watt	League Against Cruel Sports
Jared Longlands	
Jean Hunter	
Jean Shortt	
Jennifer Richardson	
Jill Truesdale	
Jim Nicholson MEP	Ulster Unionist Party

Name	Organisation Name
Jo Gibson	The Association of Veterinary Surgeons Practising in Northern Ireland (AVSPNI)
Joan Woods	The Quarries Farm
Joanne McCann	
John and Jean Watt	
John B McKee	
John Dobson	
John McGill	
Jonathan Bell	Northern Ireland Environment Link (NIEL)
Julia Grier	
Justin Judge	
Justin Kerswell	Viva! (Vegetarians' International Voice for Animals)
Karen Gallagher	
Karen Healy	
Katharine May	
Katharine May	
Katie Barbour	
Ken Brundle	Ulster Wildlife Trust

Name	Organisation Name
Kerry Hudson	
Kerry O'Donnell	
Kieran McArdle	
Lauren Bideau	
Lee McGrath	
Lesley Wise	
Lieve Hertogen	
Linda Whittern	
Lisa Wilton	
Liz Porter	
Liz Porter	
Lorraine Beattie	
Lucille Ewing	
Lyn Friel	Crosskennan Lane Animal Sanctuary
Mairead Sweeney	
Margaret M Keel.	
Marie-Claire Crothers	
Marilyn McAllister	



Name	Organisation Name
Marilyn McAllister	
Mark Jones	Born Free Foundation
Mark Wilton	Riverside farm
Martin Hancox	
Michael Logan	
Michael McGaughey	
Michael Yeates	
Mike Rendle	Northern Ireland Badger Group
Mr & Mrs Patton	
Mrs Moore	
N. McFerran	
Neil Samuel	
Niall Waterman	
Niamh Porter- Payne	
Nick Johnston	
Nicola Bennett	
Noeleen Farry	
Olwen Moffett	

Name	Organisation Name
Orlagh McLaughlin	Northern Lights Young Campaigners - expressing own views backed by scientific research.
Patricia Clarke	
Paula McShane	
Peter Crossett	
Phil Davidson	The National Trust
Phil McCartney	
Philip Moffett	Mid Ulster District Council
R Armstrong	Co. Fermanagh Farming Society
R J Hayes	Chairman of County Antrim Ulster Farmers' Union
	International Fund for Animal Welfare (IFAW)
Rebecca McQuillan	
Richard Warner	
Robert George Neely	
Roberta McDonnell	
Robyn Beattie	
Rose McIlrath	
S Chambers	

Name	Organisation Name
Sandra Gibbons	
Sharyn E Corbett	
Sharon Mackender	
Sharon Stanley	
Sharon Walton	The National Beef Association
Shelagh Henry	
Shelly Bryan	Humane Society International/UK
Shirley Fleming	N.I. Limousin Cattle Club (Breeders Association)
Simon McLarnon	
Simon Pickett	
Steven Fyffe	
Stuart Samuel	
Susan Wilson	
Terry Jones	
Timothy Peter Clarke	
Timothy Stanley	
Tina Kersting	
Tom Langton	Eurobadger

<b>Name</b>	<b>Organisation Name</b>
Vanessa Haynes	
Vanessa Mason	Somerset Badger Group
Will Short	
William H.Boal.	
William Taylor	Farmers For Action (FFA)
Zoe Nugent	

## Annex 2 – Glossary of Terms

<b>Term</b>	<b>Explanation</b>
AHWNI	Animal Health and Welfare NI
AVSPNI	Association of Veterinary Surgeons Practising in Northern Ireland
BCVA	British Cattle Veterinary Association
bTB	Bovine Tuberculosis
BVANI	British Veterinary Association NI
CHeCS	Cattle Health Certification Standards
CNCC	Council for Nature Conservation and the Countryside
DAERA	Department of Agriculture, Environment and Rural Affairs
DRT	Disease Response Team
DSO	Departmental Solicitor's Office
DUP	Democratic Unionist Party
DVO	Divisional Veterinary Office
EU	European Union
FFA	Farmers For Action

TERM	EXPLANATION
IFAW	International Fund for Animal Welfare
IFNG	Gamma interferon test carried out on a blood sample
LMC	Livestock and Meat Commission
NBA	National Beef Association
NGO	Non-Governmental Organisation
NIEL	NI Environment Link
NIPSA	Northern Ireland Public Service Alliance
OTF	Officially Tuberculosis free
OTS	Officially Tuberculosis free suspended
OTW	Officially Tuberculosis free withdrawn
PCT	Pedigree Cattle Trust
PVP	Private Veterinary Practitioner
REP	Regional Eradication Partnership
RTA	Road Traffic Accident
RUAS	Royal Ulster Agricultural Society

TERM	EXPLANATION
SIN	Statutory Improvement Notice
TBEP	TB Eradication Partnership
TBSPG	TB Strategic Partnership Group
TVR	Test and Vaccinate or Remove study
UFU	Ulster Farmers' Union
USPCA	Ulster Society for the Protection of Cruelty to Animals
UUP	Ulster Unionist Party
UWT	Ulster Wildlife Trust









