

Summary Report

Responses to the Consultation
on the Department's
Proposed Implementation and
Next Steps of the
bTB Eradication Strategy for
Northern Ireland

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Department of
**Agriculture, Environment
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Bovine TB Consultation TBBR Policy Team
Animal Health & Welfare Division
Department of Agriculture, Environment and Rural Affairs
Ballykelly House
111 Ballykelly Road
Ballykelly
Limavady
BT49 9HP

Telephone: 028 9052 5502

Text Relay: 18001 028 9052 5502

Email: TBBR.Policybranch@daera-ni.gov.uk

Web: <https://www.daera-ni.gov.uk/consultations/consultation-departments-proposed-implementation-and-next-steps-btb-eradication-strategy-northern>

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Summary Report - Responses to the Consultation on the Department's Proposed Implementation and Next Steps of the bTB Eradication Strategy for Northern Ireland



1. Introduction

- 1.1. Bovine Tuberculosis (bTB) has a devastating impact upon our cattle industry and the Department is fully committed to taking steps towards its eradication from Northern Ireland. The considerable financial cost of the Programme, (~£40m/year), also provides a powerful incentive to achieve eradication as soon as possible. This is in addition to the stark reality that a breakdown in a herd causes undue stress and hardship to our farmers, and that continuing high levels of bTB may be a future barrier to trade.
- 1.2. Our current programme underpins the ability of NI's livestock sectors to trade with the EU and internationally. In 2018, NI had sales of processed food to external markets worth ~£4billion, of which external sales of milk and milk products were estimated to be worth ~£900 million, and external sales of beef and sheep meat products were just under £1.3 billion. However, having left the EU, and with the UK seeking to strike new international trade deals, we are only too aware that sustained high levels of bTB may be a trade barrier, curtailing our agri-food industry's access to new markets.

2. Consultation background

- 2.1. The Department of Agriculture, Environment and Rural Affairs (the Department) launched a consultation on **16 July 2021** seeking views on its proposals to eradicate bovine TB (bTB), in Northern Ireland. The consultation ran until **10 September 2021** on the DAERA website, with NIDirect's Citizen Space platform providing the online survey facilities. A wide range of statutory consultees and relevant stakeholders across Northern Ireland were contacted directly via email, with details of the consultation and its supporting documents, including web links to the consultation's website page which contained further information on how to respond. During its twelve week term, the consultation was widely and regularly publicised through DAERA media platforms, including DAERA and MyNI twitter and Facebook accounts. The Department wishes to thank all stakeholders and members of the public who took the time to respond to the consultation.
- 2.2. The consultation document can be viewed on the DAERA website by clicking on the following link:
<https://www.daera-ni.gov.uk/consultations/consultation-departments-proposed-implementation-and-next-steps-btb-eradication-strategy-northern>
- 2.3. There were three main aspects to the consultation document:
 - **Part 2** outlined what has been done by the Department in recent years with regards to tackling bTB and moving a new bTB Eradication Strategy for Northern Ireland forward.
 - **Part 3** outlined what the Department intends to do; the proposals which were previously consulted upon in 2017, which the Minister indicated that he intends to start delivering from 2021 onwards. We will also sought views on two proposals within this part of the consultation;

- the criteria for the compulsory use of the interferon gamma blood test; and
 - subordinate legislation to increase powers to test non-bovines, in particular deer and camelids, in holdings where cattle are not present.
- **Part 4** outlined what the Department could do;
 - in relation to badger intervention and
 - compensation change.

3. Consultation proposals & questions

3.1. Proposals & Questions

Proposal 1 - The increased use of Gamma Interferon Testing

The interferon gamma test (IFN-g) is a supplementary diagnostic test that is currently used alongside the tuberculin skin test in selected bTB breakdown herds to increase the likelihood of detecting remaining bTB infection in the herd. Current testing capacity is 23,000 individual animal tests per annum, however, testing capacity will increase to 45,000 over the next three years. The test is currently offered on a voluntary basis. The TBSPG recommended that the Department makes it compulsory for the test to be carried out on herds where it is considered necessary following veterinary assessment, and for all animals testing positive to be removed. The rationale being that this would be beneficial in identifying test positive animals at the earliest stage and removing these from the herd to prevent further infection. In addition, the new Animal Health Law (AHL) which came into effect on 21st April 2021, requires all animals that test positive to a bTB test to be removed.

- Q1 - Do you agree with the criteria for selecting herds to receive interferon gamma testing?

Proposal 2 - The Testing of Non-bovines

Work to introduce new subordinate legislation to enable such bTB testing of non-bovine animals to take place in holdings where no cattle are present, where the Department deems these to be necessary.

- Q2 - Do you agree with the proposal to introduce testing of non-bovines as deemed necessary by the Department?

Proposal 3 - Badger Intervention

The Godfray Report - Bovine TB Strategy Review October 2018; (A strategy for achieving Bovine Tuberculosis Free Status for England: 2018 review - GOV.UK (www.gov.uk)); concluded that the presence of infected badgers poses a threat to local cattle herds. This conclusion reflected the broad consensus amongst epidemiologists who have studied the disease. Reducing the threat, by culling or non-lethal intervention, will thus help lower the incidence of the disease in cattle. The Department accepts that some form of intervention is necessary to break the cycle of infection transmission between badgers and cattle, and that action to address this risk must be part of any overall bTB Eradication Strategy.

The Department's proposal is that Wildlife intervention would be in the form of a non-selective badger cull using controlled shooting of free roaming badgers, as the predominant badger removal method, delivered and paid for by farmer led companies.

- Q3 - Do you agree with the Department's preferred option for Wildlife Intervention?

Proposal 4 - Funding of Badger Intervention

The preferred badger removal option to pave the way for follow-up vaccination of 'controlled shooting' is currently in operation in England. There, government and farmers both pay towards its implementation. Government pays for licensing, elements of training, mentoring, advice and monitoring, and farmers pay for 'on the ground' deployment expenses. The low implementation costs published by DEFRA highlight that having farmers lead on securing labour for operational requirements across their own and neighbouring land results in a cost efficient approach. In addition to this cost advantage, the English farmer led and funded deployment model provides an opportunity for farmers to be directly involved in tackling another of the disease transmission risks and, importantly, it offers significant flexibility and scalability. These advantages are critical to tackle a disease such as bTB which will emerge as disease "hot-spots" across different areas of NI over time. The proposal on funding wildlife intervention in NI is, therefore, that government would pay for administration, elements of training costs, mentoring, advice and monitoring (including post mortem inspections, as required) and farmers would pay for deployment expenses, as is the case in England.

- Q4 - Do you agree with the Department's preferred funding model for wildlife intervention?

Proposal 5 - Introduction of a Compensation cap

The proposal to introduce a compensation cap and reduce the current bTB compensation arrangements is in line with the 2009 Report of the NI Assembly Public Accounts Committee on the Control of bTB. It acknowledged that a share of the costs should be

borne by the industry. It is also in line with the 2018 NI Audit Office (NIAO) report on Eradicating bTB in NI, which recommended full implementation of the Department's proposals to reduce the bTB Programme spend.

The Department considers that an initial cap of **£5,000** is an appropriate level for a cap on compensation.

It is felt that this would be effective in changing mind sets by removing the assumption by herd keepers that the tax payer would act as an unlimited safety net. A compensation cap at this level is also a disincentive to high value pedigree cattle fraud. The proposed compensation cap is the same as that set by the Welsh Government.

- Q5 - Do you agree with the Department's proposal for the introduction of a £5,000 cap on compensation?

Proposal 6 - Reduction in the rate of compensation paid

The aim of this is to strike a balance between reasonable compensation and cutting costs, while encouraging herd keepers to take all reasonable steps to prevent disease. It seeks to create a sense of shared ownership and responsibility for eradication. Phasing the introduction of this measure should help herd keepers adjust to the new circumstances. These combined measures aim to promote equity and fairness across the industry. They would provide incentive to enhance biosecurity practices on farm, which will reduce the risk of infection re-entering herds and respect the interests of the taxpayer. DAERA therefore propose that the rate of compensation payable should be reduced on a phased basis, with a reduction to **90% in year one**, further reduced to **75% from year two**. The maximum amount paid would be subject to the cap of £5,000 per animal removed. This approach in relation to compensation reduction would also return the compensation rate to the pre-1998 rate which was 75%, and is similar to the compensation arrangements for brucellosis in place since 2012. In 1998 the bTB compensation rate was increased for a number of reasons including the lack of wildlife intervention, a factor which is now addressed by the proposed bTB Eradication Strategy.

- Q6 - Do you agree with the Department's proposals for a reduction in compensation?

Respondents were asked to answer each question in the consultation. Not all respondents did so. Respondents were also able to provide comments on the questions. Not everyone did so. In this document, for data protection reasons, responses from individuals have been treated anonymously while comments from organisations are generally attributed directly to them.

4. Consultation response data

The consultation closed on **10 September 2021** and, by then, a total of **3,367** responses were received from a range of groups, organisations, charities and individuals. Four consultation responses were received after the closing date. To ensure that all respondents were treated equally, it was not possible for the Department to extend the deadline to consider these responses. Their comments are not therefore included in this document.

As with any Northern Ireland Civil Service public consultation, responses were received from a self-selecting range of respondents. This inevitably introduces the potential for selection bias. Therefore, there can be no assumption that the stakeholders who responded to the consultation were, or were not, fully representative of the wider population.

Table 1 (below) is a breakdown summary of the profile of the responses to the consultation which were received by DAERA. **Table 2** lists the named respondents. Of the **3,367** discrete responses;

- **3,316** were received via Citizen Space containing quantitative and qualitative data;
- **44** were received via emails to the DAERA mailbox; and
- **7** written responses.

Table One below summarises who responded by type identified as per their response. Respondents were given the opportunity to state which organisation (if any) with which they wished to identify (Type). For ease of reference Table Two outlines those organisations who responded by name with abbreviations where necessary.

| Table 1 | |
|---------------------------------------|--------------|
| Type | Number |
| Farming bodies | 15 |
| Individual farmers | 2,331 |
| Veterinary bodies | 3 |
| Individual vets | 16 |
| Environmental/conservation bodies | 10 |
| Individual environmental/conservation | 22 |
| Individuals | 952 |
| Political parties | 1 |
| Individual politicians | 6 |
| Non-affiliated organisations | 5 |
| Non-bovine bodies | 6 |
| Total | 3,367 |

| Name of Organisation | Abbreviation |
|---|---------------------|
| Agricultural Consultants Association (Northern Ireland) | ACANI |
| AgriSearch | |
| Alpacas | |
| Ashtonelle Alpacas | |
| Association of Veterinary Surgeons Practising in Northern Ireland | AVSPNI |
| Badger Trust | BT |
| Ballymac Alpacas | |
| Belfast Alpacas | |
| Belfast Hills Farmers | BHF |
| Born Free | BF |
| British Cattle Veterinary Association | BCVA |
| British Veterinary Association (Northern Ireland) | BVA(NI) |
| Countryside Alliance Ireland | CAI |
| Dairy Council for Northern Ireland | DCNI |
| Eurobadger | EB |
| Farmers for Action | FFA |
| Holstein Northern Ireland | HNI |
| Keep Northern Ireland Beautiful | KNIB |
| Livestock and Meat Commission | LMC |
| National Beef Association | NBA |
| National Trust | NT |
| Northern Ireland Agricultural Producers Association | NIAPA |
| Northern Ireland Alpacas | |
| Northern Ireland Badger Group | NIBG |
| Northern Ireland Blonde Cattle Club | NIBCC |
| Northern Ireland Environment Link | NIEL |
| Northern Ireland Grain Trade Association | NIGTA |
| Northern Ireland Meat Exporters Association | NIMEA |
| Mourne Alpacas | |
| Pedigree Cattle Trust | PCT |
| Royal Society for the Protection of Birds | RSPB |
| Royal Ulster Agricultural Society Cattle Committee | RUASCC |

| Name of Organisation | Abbreviation |
|---|---------------------|
| Rural Support | RS |
| South Antrim Dairy Group | SADC |
| TB Eradication Partnership | TEBP |
| Ulster Farmers Union | UFU |
| Ulster Society for the Prevention of Cruelty to Animals | USPCA |
| Ulster Wildlife Trust | UWT |
| Woodland Trust | WT |
| Workers Party | WP |

- 4.1. The consultation document provided respondents with the opportunity to answer questions based on the proposals, either in favour of the proposals or against. Respondents were also provided with the facility to comment on the proposals. Not all respondents provided comments and of those that did, we provide the key comments within this summary. We have as far as possible reproduced the comments of respondents as they were submitted only amending for ease of reading. The analysis of each question details the number of respondents, the number for and against, the number of comments received and the key comments.

5. Consultation methodology

Stage 1 - Quantitative Responses: The quantitative responses were based on the data collected from the tick-box options, i.e. 'yes', 'no' or 'not answered' options, and a percentage analysis approach and application was applied to assess the preferred or dominant views within these responses.

Stage 2 - Qualitative Responses: The qualitative data within the responses to the consultation i.e. comments provided; were analysed using a 'thematic analysis' method. This method examines the data, to identify common themes i.e. topics, ideas and patterns of meaning which occur repeatedly across the collection of responses.

Further analysis of responses for each of the groups of respondents is provided. Some of the key comments from the main stakeholder organisations are also recorded in those annexes.

6. Consultation response overview

A number of key farming organisations encouraged their members to respond to the consultation and provided advice on the proposals. The environmental community also provided advice to members and the general public on their web sites on the consultation, particularly in relation to the proposed approach to badger intervention.

In addition the Ulster Wildlife, NI Badger Group and the USPCA organised a public petition opposing the badger cull.

On the compulsory use of gamma testing where deemed appropriate by veterinary assessment, there was a large proportion against this. The reason for this was, mostly, linked to the associated concerns around the proposed compensation cuts and also concerns around the proposed criteria to be used in selection of herds.

The environmental community were generally supportive of the proposals in relation to gamma testing. Some also advocated the greater use of other antibody tests such as Enferflex and the Antiphage test.

Overall with the exception of those from a conservation/environmental background, there was support for wildlife intervention but not for the approach to cost sharing or delivery by farmers.

The environmental community responses were opposed to the proposed approach within the consultation, however the Ulster Wildlife did acknowledge the need to address disease and along with other organisations such as the Woodland Trust indicated that their preferred approach was Test and Vaccinate or Remove.

Some organisations felt that initial deployment should be paid by DAERA whilst others felt it should be funded via a levy.

The majority of responses were also against the proposals for a cap and reduction in compensation, many felt that farmers were already under significant financial pressure. The Ulster Wildlife Trust highlighted changes to European agricultural policy creating an additional burden for farmers.

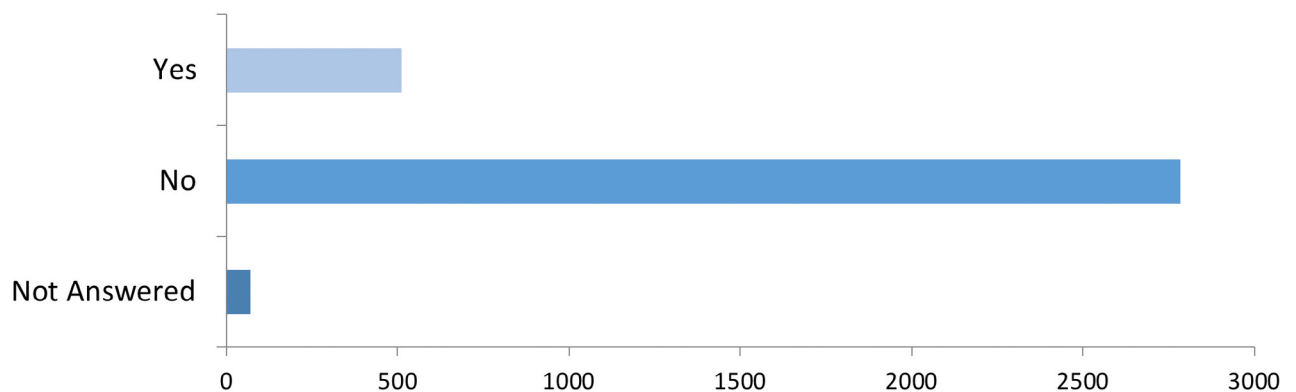
7. Responses to individual consultation questions

Respondents to the consultation were asked to answer six questions. A summary of the responses received to each question is provided below. Due to the large number of responses, the detail of all responses cannot be shown in the qualitative analysis though these have been taken into account as part of the analysis. A sample of some of the key responses are provided.

Q1: Do you agree with the criteria for selecting herds to receive interferon gamma testing?

Stage 1 - Quantitative Analysis

There were **3,295** responses to this question and **566** comments.



| Option | Total | Percent |
|--------------|-------|---------|
| Yes | 510 | 15.15% |
| No | 2,785 | 82.71% |
| Not Answered | 72 | 2.14% |

Stage 2 - Qualitative Analysis

a) Farmers and Farming bodies

FOR

SADC, FFA, NIGTA, RUASCC and LMC.

LMC - *think it is important to use every available evidence based measure in the tool box to drive down levels of TB infection in the Northern Ireland cattle population and the increased use of gamma interferon testing seems like a sensible proposition. With regard to the specific criteria for selecting herds it will be for the disease control experts in DAERA veterinary service to determine their appropriateness.*

SADC - *Broadly supportive of the criteria for selecting herds to receive IFN-g testing, however they would have reservations as to the accuracy of the test.*

AGAINST

ACANI, BHF, DCNI, UFU, HNI, NBA, NIAPA, NIBCC, and PCT.

UFU Comments

UFU is of the firm opinion that the criteria for using gamma testing within a herd should not include herd size, regardless of logistics.

The interferon-gamma test has been frequently demonstrated to have a superior sensitivity but an inferior specificity when compared to the intradermal skin test. Whilst UFU agrees with most of the criteria for selecting herds for increased use of interferon gamma, they cannot support any proposal which increases the use of a test that removes an excessive amount of false positive animals, alongside a proposed reduced compensation model.

UFU would give its support to the increased use of interferon gamma testing if 100% livestock valuation payment was guaranteed for these animals.

DAERA have proposed the compulsory use of gamma testing where they deem it to be required. A farmer will no longer have any say in the selection of their herd for a gamma testing regime. Whilst forcing a farmer to complete a gamma test may be deemed acceptable by UFU under certain circumstances; to forcibly remove a high number of animals from a farmer under interpretation of the results which traditionally return a high number of false positives is a difficult concept for UFU to support. But to combine the above factors with a reduced compensation model is economically unsustainable for UFU members to support. In that regard, UFU cannot support a model which makes the interferon gamma test compulsory in the absence of guarantees about compensation levels.

PCT - *This test will identify a considerable number of false positives.*

HNI - *Interferon Gamma testing will identify a considerable number of false positives. In the case of persistently infected herds, removing infected cattle whilst leaving a high level of TB infection in the wildlife population is futile.*

NIAPA - *Given previous expenditure and lack of successful control when additional European funding was available, we feel we cannot justify additional costs or what could be classified as further penalties for farmers.*

BHF - *Gamma test is known to have false positives - given the proposals relating to reduction of compensation to 75 percent, they cannot support this.*

Responses from farmers, farm business and those who have declared a farming interest

| Yes | No | Not answered |
|-------|--------|--------------|
| 220 | 2,082 | 25 |
| 9.46% | 89.48% | 1.06% |

Most comments reflected the UFU position - too many false positives, not all herds would be considered and shouldn't be introduced if compensation is being reduced.

b) Veterinary bodies and individual vets

FOR

BCVA and BVA (NI)

BCVA *Despite good specificity (99.98%) the skin test has a much lower sensitivity (80% is an optimistic expectation).*

For this reason, supplementary testing can be useful for increasing sensitivity, thereby missing less false negative animals.

The interferon gamma test is already widely used in England and has a sensitivity of nearer 90% (specificity for the gamma test is 96.6%).

This means the likelihood of 'missing' positive animals is much less and with less residual infection in the herd it is more likely the herd will go clear and stay clear if they can prevent new infection getting in.

This does mean that reactor numbers may increase and so it is important to identify other risk areas such as buying in infection or wildlife reservoirs so that any benefits gained from interferon gamma testing aren't lost

BVA (NI) We support the wider, government-funded roll-out of this more sensitive test, as a supplement to the SICCT, to support the prompt identification and removal of infected animals from breakdown herds.

AGAINST

AVSPNI *Gamma interferon is a good adjunctive test and as such should be used on herds of all types and sizes such as large, small, pedigree.*

Lack of clarity with respect to interpretation is already a contentious area and increased use of gamma interferon could exacerbate this.

Good communication and consistency around its use and interpretation is therefore essential to keep all stakeholders engaged.

Responses from veterinary organisations and individual vets

| Yes | No | Not answered |
|-------|-------|--------------|
| 6 | 13 | 0 |
| 32.0% | 68.0% | 0 |

There were **10** comments most reflected the **AVSPNI** position regarding herd size clarity with respect to interpretation and good communication.

c) Environmental community and individuals with declared wildlife interest

All organisations were in favour.

UWT - *The cornerstone of TB control in cattle and other species is the rapid, accurate identification and removal of animals infected with the TB bacterium Mycobacterium bovis (M. bovis) before they can spread the disease to other animals. Use of the interferon gamma test (IFN-γ) will maximise the probability of detecting bTB-infected animals in cattle herds affected by breakdowns and should be compulsory within the categories outlined in the consultation given the significant investment in time, resource and compensation by government through public funds.*

BT - *Badger Trust also suggests that IFN-g or other OIE-validated antibody blood tests should be used for all pre- and post-movement testing because it is cattle movements that are the primary driver of the spread of bTB to new herds around the country. We also recommend use of Antibody blood tests (IDEXX and Enferplex) that measure the immune response to bacterium that causes bovine TB. These Antibody tests have a key role to*

play in detecting infected cattle, particularly those with advanced infection which might have failed to react to the tuberculin-based tests. It is expected that the new Actiphage test will be approved for use from May 2022. This new test offers advantages over existing tests and we understand that there is already demand for it among farmers in NI. Northern Ireland therefore could lead the way for the United Kingdom in being the first to deploy this much awaited advancement.

NIBG - *The criteria listed in the consultation identifies those scenarios where supplementary testing can be most effectively deployed to clear infection from those herds which pose the greatest risk of harbouring undetected disease. In addition, the scope and rationale of the criteria provides a proportionate and targeted use of IFN-g to greatly assist in the Eradication Programme.*

Individuals with declared wildlife interest responses

| Yes | No | Not answered |
|-----|-----|--------------|
| 16 | 4 | 2 |
| 73% | 18% | 9% |

Comments from individuals reflected those outlined above.

d) Responses from individuals with no specified interest

Comments expressed by individuals are outlined below.

FOR

This would help identify more TB in NI herds which would help to cut down re-infection from cattle with unidentified disease from the unreliable skin test. Cattle to cattle spread is driving TB across the province.

The criteria set out in the Consultation Document details scenarios where supplementary testing can be most effectively applied to clear infection from those herds which pose the greatest risk of carrying undetected disease. In addition the scope and rationale of the criteria provides a proportionate and targeted use of testing to improve the Eradication Programme.

Use of the interferon gamma test (IFN-γ) will maximise the probability of detecting bTB-infected animals in cattle herds affected by breakdowns and should be compulsory within the categories outlined given the significant investment made in time, resource and compensation by government through public funds.

AGAINST

All we are focused on is blood sampling or skin testing. Why cannot the focus be on vaccination?

More accurate ways of testing are available, the most promising of which, e.g. Actiphage, measure the presence of M bovis, rather than the immune response to it. Immunity is often suppressed in stressed or ill animals, giving frequent false negatives and residual capacity to spread disease.

Too many false positives.

Extra stress will be put on animals and farmers for a test that is known to give false positives.

| Yes | No | Not answered |
|-----|-------|--------------|
| 250 | 662 | 40 |
| 26% | 69.5% | 4.5% |

e) Political representatives

There was one party response, the others were from individuals who indicated that they belonged to a political party. Only the Workers party made any comment.

FOR

The Workers Party, and two political representatives

The Workers Party

The Workers Party appreciates the complex nature of Bovine TB, its effects on animals and the impact on the farming community.

The Workers Party, however, does not consider indiscriminate badger culling to be a proportionate or acceptable way to address this issue in circumstances where more ethical approaches exist.

Political representatives

No comment made.

AGAINST

Three responses from political representatives

No comment made.

Responses from the political parties and representatives

| Yes | No | Not answered |
|-----|-----|--------------|
| 3 | 3 | 1 |
| 43% | 43% | 14% |

One Political party and two political representatives were for the proposal.

Three political representatives were against.

One political representative did not make any response.

f) Non-affiliated organisations

FOR

Rural Support - Keep NI Beautiful - TBEP

Rural Support

Supportive of use of all effective testing methods - however should be extended to all herds as soon as practicable.

Keep NI Beautiful

Multiple studies have shown that the current SICCT test will fail to detect a proportion of infected cattle from within herds experiencing a bTB breakdown. This hidden disease burden potentially results in recurrent or chronic TB breakdowns, with significant impacts on affected cattle keepers.

Given its higher sensitivity (relative to the SICCT), wider use of the interferon gamma test is advisable, as it should act to identify some animals missed by the SICCT, removing additional infected cattle from the population.

Widespread use of the interferon gamma test in England, alongside other measures, has been associated with a fall in breakdown rates in the High-risk area. We agree with the criteria outlined in the consultation regarding selecting herds to receive interferon gamma testing. However, there are very many criteria listed and it is unclear which of these are the priority. This will need to be clarified.

Furthermore, our experience is that many farmers are overly wary of the interferon gamma test, wrongly believing that the test will remove large numbers of false positive animals.

We strongly suggest that any increased use of the interferon gamma test also involves significant efforts to support, educate and inform cattle keepers of the facts, risks and benefits of the test.

TBEP

We feel it is crucial to take cognisance of the characteristics of the IFN-g test in considering how it is applied. The IFN-g test has a superior sensitivity, but an inferior specificity compared to the SICCT. Its application is valuable to the TB eradication programme in identifying additional TB infected animals that are not disclosed by SICCT as it is likely to detect more infected animals at an earlier stage of infection.

Therefore, its primary purpose will be to detect infection where there is strong epidemiological evidence of undisclosed infection within the herd i.e., where ongoing infection in a herd is due to unidentified infected animals, as opposed to where infection is likely from introduced animals or from a wildlife source.

Therefore, DAERA must clearly define the criteria for selecting herds for IFN-g testing so that is used appropriately.

The IFN-g test's relatively poorer specificity compared to the SICCT means that it has a poor positive predictive value, i.e., there will be a substantial proportion of animals that test positive but are in fact uninfected. This therefore precludes its very wide scale use i.e., it could not, in its current form, be applied in a broad surveillance form, particularly if EU AHL requires the removal of test positive animals. In the context of a herd with undisclosed infection, removing test positive but uninfected animals may well be worthwhile if it allows the removal of previously undisclosed but infected animals.

Therefore, using the test in a targeted way is likely to be valuable but using it as a wide scale primary screening tool will invariably lead to an unacceptable number of false positive animals. DAERA should take cognisance of the specificity of the test in considering the compensation rate for animals removed following a positive IFN-g test. Given a number of these animals will not be infected, it appears unbalanced to reduce the compensation rate for these animals to the same extent as those that are SICCT positive. We would recommend that the proposed compensation cut is not applied to IFN-g positive animals at all.

DAERA should keep under continual review the criteria for using the IFN-g test. DAERA should monitor the number of animals that are removed due to IFN-g testing and assess the value it is providing to the overall programme.

Also, it is possible that future research or modelling may indicate particular 'high risk' herds where the application of the test might be valuable if applied early (e.g., high throughput herds with ongoing risk of infection transmission to other herds). However, DAERA would need to scope out the cost/benefit of such a change in policy.

Not Answered

KNIB supports the position taken by Ulster Wildlife in relation to the criteria for selecting herds to receive interferon gamma testing.

Responses from non-affiliated organisations who have declared an interest.

| Yes | No | Not answered |
|-----|----|--------------|
| 3 | 0 | 2 |
| 60% | 0% | 40% |

There were **4** comments. Three of the responses were for the proposal, one of the responses was against the proposal and one of the organisations did not make any response.

g) Non-Bovine Organisations

Five of the six organisations were against this proposal with one organisation not answering the question.

AGAINST

Alpacas; Ballymac Alpacas; Belfast Alpacas; Mourne Alpacas; Northern Ireland Alpacas

Alpacas

No comment made.

Ballymac Alpacas

False positives are higher with this testing.

Belfast Alpacas

Given that camelids are genetically quite different from bovines which test or tests does the Dept. propose to use on Alpacas?

Only gamma-interferon tests and SICCT tests are mentioned in the consultation document. Whilst gamma-interferon tests are considered to have better sensitivity than the SICCT in camelids, they have been shown to be impractical.

Mourne Alpacas

Does this proposal relates to cattle only, or is there the intention to use the interferon gamma test on alpacas that the Dept. proposes to extend testing legislation to, as a mandatory test. In this case, there is insufficient science relating to the efficacy of the test in relation to Camelids.

Northern Ireland Alpacas

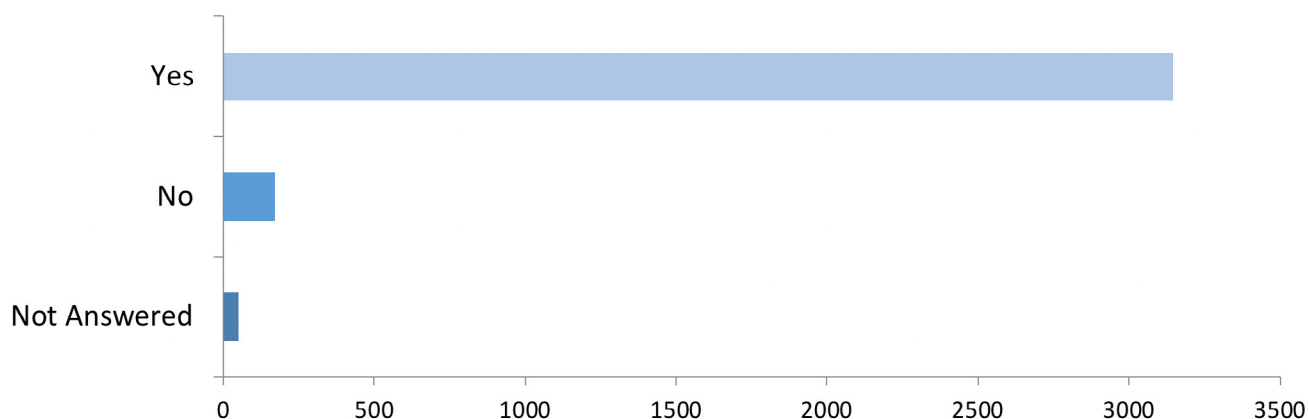
No comment made.

| Yes | No | Not answered |
|-----|-----|--------------|
| 0 | 5 | 1 |
| 0 | 83% | 17% |

Q2: Do you agree with the proposal to introduce testing of non-bovines as deemed necessary by the Department?

Stage 1 - Quantitative Analysis

There were **3,318** responses to this question.



| Option | Total | Percent |
|--------------|-------|---------|
| Yes | 3,148 | 93.50% |
| No | 170 | 5.05% |
| Not Answered | 49 | 1.46% |

There were **515** comments.

Stage 2 - Qualitative Analysis

a) Farmers and Farming bodies

FOR

All farming organisations who responded were in favour of this proposal;

UFU stated that they believe that the disease should be tackled in whatever the host species is. To date only disease within bovine animals has been addressed with poor levels of success in eradication of bTB. Despite removing thousands of cattle from the production system over the last decades, TB continues to aggrss the NI herd. UFU encourage DAERA to pursue the disease in all of its hosts.

NIAPA - NIMEA - strongly support the removal of every reservoir of TB infection. Public communication is vital in this regard and it is essential that DAERA clearly communicates its testing and culling strategy to the general public.

Responses from individual farmers, farm businesses and those who have declared a farming interest.

| Yes | No | Not answered |
|-------|------|--------------|
| 2,227 | 90 | 10 |
| 95.7% | 3.9% | 0.4% |

There were **303** comments.

Most comments stated that TB should be addressed in all potential hosts.

b) Veterinary bodies and individual vets

FOR

AVSPNI, BVANI and BCVA

All of the organisations were in agreement with this proposal.

AVSPNI - There is little point in testing cattle while leaving other potential host species in the vicinity untested.

BCVA - Whilst these are likely to be end stage hosts (but not always), where there is suspicion of disease then BCVA would support such testing.

In England non-bovines with a suspicion of disease are already tested.

If they are at risk because they are on a holding with bTB then BCVA would consider testing a positive and necessary approach to minimise risk to owners or other stock.

BVA (NI) - *We agree with DAERA introducing the provision to test non-bovine animals in holdings where cattle are not present.*

AGAINST

No one was against.

Responses from veterinary organisations and individual vets.

| Yes | No | Not answered |
|------|----|--------------|
| 19 | 0 | 0 |
| 100% | 0 | 0 |

There were **9** comments.

Most comments stated that bTB should be addressed in all potential hosts.

c) Environmental community and individuals

All organisations support this proposal.

UWT - *Bovine TB (bTB) can be carried and spread by a variety of species including badgers, deer, alpacas, llamas, goats, foxes, cats and dogs. We therefore agree with the introduction of testing non-bovines as deemed necessary by the Department. However, we are strongly of the view that only infected animals should be removed. There is no justification for killing healthy animals.*

EB - *The proposals to progress more effective herd testing and infection control measures are welcome but long overdue. Use of the Single Intradermal Comparative Cervical Tuberculin (SICCT) test has resulted in a persistent reservoir of undetected TB infection in the Northern Ireland herd. It should be recognised that mistakes have been made following advice from other countries. There is a need to start again following the Wales model. New tests are available and being validated for use in 2022 and these important details are absent from the proposals.*

Individual responses

| Yes | No | Not answered |
|-------|-------|--------------|
| 17 | 3 | 2 |
| 77.5% | 13.5% | 9% |

Comments from individuals reflected those above.

d) Responses from individuals with no declared interest

| Yes | No | Not answered |
|-----|------|--------------|
| 846 | 73 | 33 |
| 89% | 7.5% | 3.5% |

Comments from individuals included.

FOR

To get on top of TB, all animals that carry and spread the disease need to be tested.

Bovine TB can be carried by a variety of species including badgers, deer, alpacas, llamas, goats, foxes, cats and dogs. I therefore agree with the introduction of testing non-bovines as deemed necessary by the Department.

TB needs to be addressed on all fronts.

AGAINST

There is no detail on the type of test that would be employed

Concern of validity of results

Insufficient information in consultation paper as to what actually qualifies as non-bovine and the potential impact and/or benefits that testing or not testing 'non-bovines' would have.

e) Political representatives

FOR

The Workers Party, and five Political representatives

The Workers Party

Yes, with reservations. There is no justification for killing healthy animals.

Political representatives

No comments were made.

Not Answered

There was one response from a political representative.

Responses from the Political parties and from Political representation.

| Yes | No | Not answered |
|-----|----|--------------|
| 6 | 0 | 1 |
| 86% | % | 14% |

There was **1** comment with one political party and five political representatives for the proposal. One Political representative did not make any response.

f) Non-affiliated organisations

FOR

All of the organisations were for the proposal.

Rural Support

All species capable of contracting or transmitting BTB should be included in testing.

Keep NI Beautiful

We generally agree with the proposal to introduce testing of non-bovines, in order to address any potential disease risks.

However, the text in the proposal is lacking in detail, as it is unclear specifically which non-bovine species will be affected (only two are listed) or what the outcome of positive test results will be and it is important that this is clarified

TBEP

We agree with the proposal to test non bovines.

Countryside Alliance

In addition to improved testing of cattle, yes. However, only infected animals should be removed. There is no justification for killing healthy animals.

Responses from Organisations who have declared an interest

| Yes | No | Not answered |
|-----|----|--------------|
| 4 | 0 | 1 |
| 80% | 0% | 20% |

There were **4** comments in favour of the proposal.

g) Non-bovine organisations

FOR

Ashtonelle Alpacas

Compared to the high number of cattle in NI, simple mathematics alone indicates that any risk from alpacas is low/insignificant compared to the reservoir of undetected infection in cattle. Nevertheless, it is in everyone's best interest that an effective, science and evidence-led bovine TB strategy in Northern Ireland is developed and deployed.

The majority of alpaca breeders and owners already exercise extreme vigilance with respect to the risk of BTB infection in their herds, recognising that robust herd health management and biosecurity measures are essential for preventing infection and/or transmission of bTB.

Alpaca breeders agree that extending testing of camelids (rather than exclusively those where there are cattle on the farm) should only be conducted when DAERA has evidence or reasonable suspicion that infection exists. Any testing beyond that would pose a real barrier to the development of the alpaca industry in Northern Ireland and would actively discourage new alpaca owners from registering their herds, which would be counterproductive in terms of tackling bTB.

Finally, alpaca owners should be included in any schemes and funding to incentivise and support the implementation of measures needed to meet and maintain the required standards for control/eradication of bTB. Compensation for alpaca reactors should be applied in the same way as for cattle, or at least to the same level as in England.

AGAINST

Alpacas; Ballymac Alpacas; Belfast Alpacas; Northern Ireland Alpacas; Mourne Alpacas.

Ballymac Alpacas

Alpacas are not considered livestock, exotic pets I believe. As such they are not currently afforded the support or protections (including compensation) given to farmers with regards to infectious diseases.

Other animals, such as sheep, goats and pigs that are susceptible to bTB and are farmed in NI at numbers much greater than alpacas have not been mentioned.

Pre-movement testing is already widely deployed within the alpaca community in Northern Ireland, willingly and at the cost of individual owners.

There is no detail on the type of test that would be employed.

There is no mention of ensuring dialogue and consultation with alpaca breeders and owners going forward in implementing any new legislation.

Belfast Alpacas and Northern Ireland Alpacas

Comments provided were similar to above.

Mourne Alpacas

I and many others have a vested interest in the paper mention at point 3.5, page 18, about the testing and removal of suspected infected camelids.

Here at Mourne Alpacas, we voluntarily test, regularly, using the blood testing 7-antigen protocol with Surefarm and Enfer. We plan to continue to test in this way, regularly, and voluntarily, in order to attempt to ensure the health of our herd.

In light of our approach to biosecurity and blood testing here on our holding, we have many concerns in relation to this proposal to introduce testing of non-bovines, in light of the lack of science and research for the use of priming and blood testing on camelids.

My concerns for discussion and response from you are as follows:

In relation to the wording of the point at 3.5, in particular:

“Testing would be required where the Department has evidence or reasonable suspicion that infection exists”

I am concerned about the use of the phrase ‘reasonable suspicion’ The text is open and ambiguous as to what exactly ‘reasonable suspicion’ is, or will be quantified or qualified? Will this point be clarified, and backed with metrics and measurable or specific parameters by which suspicion of infection may be measured or qualified?

I would very much welcome the opportunity to be involved in discussions regarding this new consultation paper and the proposals therein, and look forward to hearing from you at your earliest convenience, with a response to my 3 highlighted questions above.

Our wish here at Mourne Alpacas is to work with the Department, cohesively and positively, encouraging discussion and inclusion of all farm holdings affected by this consultation, and thereby to aim for a healthier agricultural community across Northern Ireland.

Belfast Alpacas

The proposals mention bringing Northern Ireland into line with other UK areas. Does this mean Alpaca owners will be entitled to compensation for TB reactors in their herds and if so what compensation will be offered for the various categories of animals? i.e. breeding, stud, non-breeding animals.

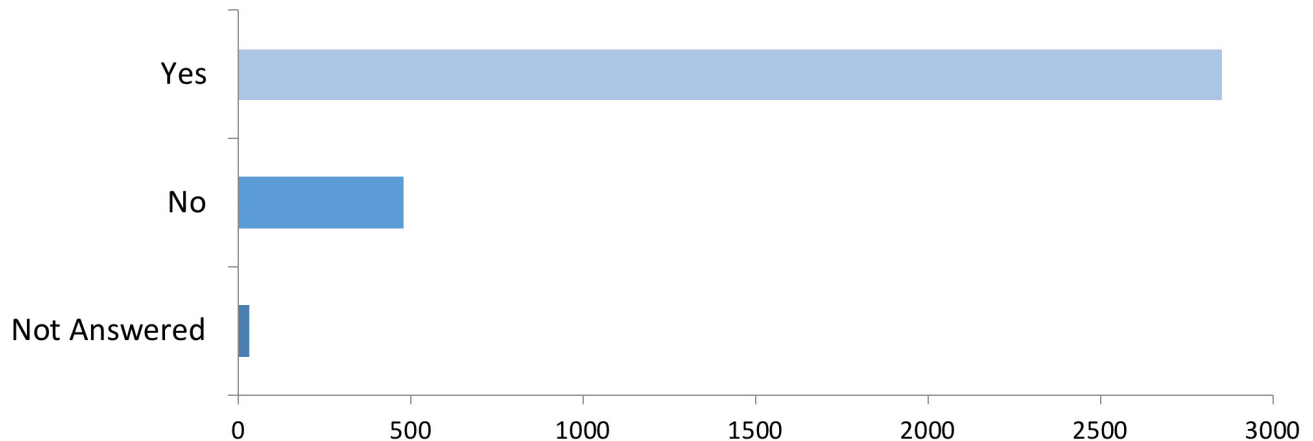
Responses from organisations and businesses who have declared a Non Bovine interest.

| Yes | No | Not answered |
|-----|-----|--------------|
| 1 | 5 | - |
| 17% | 83% | - |

Q3: Do you agree with the Department's preferred option for Wildlife Intervention?

Stage 1 - Quantitative Analysis

There were **3,334** responses to this question.



There were **593** comments.

| Option | Total | Percent |
|--------------|-------|---------|
| Yes | 2,853 | 84.73% |
| No | 481 | 14.29% |
| Not Answered | 33 | 0.98% |

Stage 2 - Qualitative Analysis

a) Farmers and Farming bodies

FOR

All organisations who identified as a farmer or farming body were in favour of this proposal.

UFU

The UFU provided a lengthy, detailed response stating, inter alia The Committee feel that the option preferred by the Department, a non-selective cull, by controlled shooting of free roaming badgers, complemented by cage trap option, paving the way for vaccination; provides an effective model for the reduction of bTB occurrence in infected areas. UFU note that DAERA provided their business case based on 1200km². Although correspondence with DAERA has provided reassurances that this is not a maximum, UFU wish to express the need for wildlife intervention to be considered for all problem areas as the scheme progresses. DAERA should be focussing on delivering meaningful intervention in any area which meets the criteria for intervention from the outset, with a view to achieving rapid reduction in bTB prevalence.

RUASCC

The removal of infected badgers is seen as part of the necessary response to reduce and potentially eradicate TB in Northern Ireland.

LMC

It is important that Government is seen to be leading this programme with industry support.

NIMEA

The current situation is unsustainable and we support the need for wildlife intervention and the farmer-led badger cull. However, due to the emotive nature of this debate, it is essential that government is clear in its oversight and support for a farmer-led cull.

Responses from individual farmers, farm businesses and those who have declared a farming interest.

| Yes | No | Not answered |
|------------|-----------|---------------------|
| 2,143 | 166 | 18 |
| 92.1% | 7.1% | 0.8% |

There were **302** comments.

Most comments stated that bTB in wildlife needs to be addressed, with a few comments against a cull as proposed.

b) Veterinary bodies and individual vets

FOR

BCVA and BVA (NI)

BCVA

Badger culling in the HRA of England has led to a 13-year all time low for TB in the Southwest. The Downs report published in 2018 has shown a decrease in new herd breakdowns by 37% in Somerset and 66% in Gloucestershire.

Culls are farmer led and delivered. Insurance, traps, ammunition, and disposal of badgers require appropriate funding. One of the conditions for culling licenses is the need for farmers to carry out good bTB biosecurity.

This is to prevent both badgers and cattle from spreading infection between each other.

As farm vets working with clients dealing with this devastating disease, we support cull groups by sharing the science and latest available evidence. The conditions of culling licences in England include the need for farmers to carry out good bTB biosecurity. In many areas vets will organise meetings to discuss risk-based trading, encouraging farmers to enquire about the TB status of a herd before purchase.

As the BCVA TB Policy asserts, the farming industry and veterinary profession share a unique experience in battling Bovine tuberculosis (bTB), - and it is essential that wildlife control remains a tool that can be deployed where the epidemiological evidence supports it. This is an infectious disease with risk pathways that can be reduced using greater understanding, clinical freedom for farm vets, engagement with farmers and effective herd management.

BVA (NI)

We believe badger culling in a targeted, effective and humane manner is necessary in carefully selected areas where badgers are shown to be a significant contributor to the presence of bTB in cattle. We are encouraged by comments in section 4.7.1 that outlines how surveillance of badgers will be carried out through RTA surveys. We would ask that these RTA surveys are extensive and fully considered when making decisions regarding potential badger interventions.

AGAINST

AVSPNI

We do not support the controlled shooting of free roaming badgers as the predominant removal method.

We can only support an option that is demonstrably humane, targeted and effective and where the welfare of the badger is paramount.

Whatever removal method is chosen, it must be closely overseen and tightly controlled by the regulatory authority and must be confined to bTB hotspots.

Responses from veterinary organisations and individual vets

| Yes | No | Not answered |
|-----|-----|--------------|
| 14 | 5 | 0 |
| 74% | 26% | 0 |

There were **8** comments. Most comments stated that TB in wildlife needs to be addressed, with a few comments against a cull as proposed.

c) Environmental community and individuals

All organisations who responded are against this proposal.

UWT

Ulster Wildlife disagrees with the preferred approach for wildlife intervention in the consultation as it is disproportionate in relation to the wildlife contribution to Bovine TB transmission. Badgers are a protected species and there are ethical alternatives, which have been shown to be effective in reducing the level of Bovine TB in badgers, instead of indiscriminate culling by shooting free roaming badgers. Over 100,000 badgers have been killed in England and also in the Republic of Ireland in recent years during badger culls with variable impact on bovine TB levels in cattle. Scientific reviews by experts have shown that any contribution by badgers in transmitting the disease is modest. DAERA's own research indicates that 4 out of 5 badgers in Northern Ireland are bovine TB-free. There is therefore no justification for an indiscriminate cull of badgers. Test vaccinate release or remove (TVR) has been piloted in NI and proven to reduce the level of bTB in badgers from 14% to 2% over a 5-year period.

EB

There appears to be a significant shortfall in lawful standards in the proposal and on several Grounds. We are consulting others regarding similar shared concerns and interests.

We would advise you to 'come to the table' beyond as in the past, at least, to address the misinformation and other problems of strong public interest. These may otherwise engage us in protracted conflict, as in England since 2013.

USPCA

There is strong scientific consensus, shared by many leading experts, that culling badgers is not an effective way to reduce bovine TB in cattle. This is further evidenced by the fact that the badger culling programmes in England and the Republic of Ireland over recent years have failed to deliver predicted reductions of bTB levels in cattle.

Badger culling is also a very emotive issue for the general public. This is reflected in the petition by Ulster Wildlife, which at the point of submission of this response has over 5,000 signatories.

WT

The Woodland Trust's preferred option is for the use of a Test Vaccinate Remove (TVR) approach as this offers a more balanced method to control levels of TB in badgers and cattle than the non-selective cull proposed in option 8.

DAERA's own research shows 4 out of 5 badgers in NI are TB free. No justification for an indiscriminate cull of badgers, a protected species!

Test vaccinate and release/remove (TVR) was piloted in NI and proven to reduce bTB in badgers from 14% to 2% over 5 years.

Individual responses

| Yes | No | Not answered |
|-------|-------|--------------|
| 3 | 19 | - |
| 13.5% | 86.5% | - |

Comments from individuals against the proposal reflected those above. Of the three in favour of the proposal, one commented as follows;

I want to see a healthy badger population free from TB. Badgers in hot-spot TB areas should be culled to help achieve this.

d) Responses from individuals with no declared interest

| Yes | No | Not answered |
|-----|-----|--------------|
| 663 | 274 | 14 |
| 69% | 29% | 2% |

Comments made included.

FOR

Yes badgers need controlled.

This approach has been proven to help when used in England.

Badger population is too high in some areas and needs reduced to lower the disease load.

This is a well proven method in other areas (e.g. Rol & GB.) It is also based on science.

Sadly badgers have to be culled to control the spread of bTB in cattle. If badgers are not culled to control bTB in cattle, their numbers will increase so much that they will be regarded as vermin.

AGAINST

Badgers are protected by law. Killing healthy animals will do nothing to stop disease.

The indiscriminate killing of healthy animals is a thick headed approach in 2021. Surely we've moved past such blunt methods.

A non-selective cull removing badgers 75% of which are likely to be disease free, irrespective of the capture method, is not acceptable. In addition, shooting will not be acceptable either for the reasons given.

This has already been proved as being ineffective. Even if you killed all the badgers, it wouldn't stop there. You would have to then kill all deer, goats, pigs, cats and dogs.

e) Political representatives

FOR

Three responses from political representatives

No comment was made.

AGAINST

The Workers Party and three political representatives

The Workers Party

The Workers Party opposes the proposed approach for wildlife intervention in the consultation as it is disproportionate in relation to the wildlife contribution to Bovine TB transmission.

Badgers are a protected species and there are ethical alternatives which have been shown to be effective in reducing the level of Bovine TB in badgers, instead of indiscriminate culling by shooting free roaming badgers.

The Department's own research indicates that 4 out of 5 badgers in Northern Ireland are bovine TB-free. Test vaccinate release in Northern Ireland has been proven to reduce the level of Bovine TB in badgers from 14% to 2% over a 5-year period. There is, accordingly, no justification for an indiscriminate cull of badgers.

Political representative

I support Selective Cull, via Test, Vaccinate or Remove (TVR), followed by vaccination; as per Option 7 (Part 5, p44): Programme Enhancements with WL - Selective Cull (TVR) using restraints, paving the way for vaccination, delivered by the private sector under contract to government.

Political representatives

No comments were made from two of the Political representatives

Responses from the Political parties and from Political representation

| Yes | No | Not answered |
|-----|-----|--------------|
| 3 | 4 | 0 |
| 43% | 57% | 0% |

Three political representatives were for the proposal, one political party and three political representatives were against.

There were 2 comments made one from a political Party and one from a political representative.

The Workers Party was opposed to Wildlife Intervention.

The political representative supported a selective cull via Test, Vaccinate or Remove (TVR).

f) Non-affiliated organisations

FOR

Rural Support - TBEP - AgriSearch

AgriSearch

AgriSearch is committed to the use of sound science to achieve its goals. For any TB eradication strategy to have a hope of success it must be based on science and empirical evidence and not on emotion. We believe that DAERA's proposed option for wildlife intervention is based on sound science and empirical evidence of similar schemes operating in other parts of the British Isles.

Rural Support

Wildlife intervention is essential and needs to be pursued with some urgency.

TBEP

We broadly support farmer led badger cull, in areas identified by DAERA, using controlled shooting supplemented by cage trapping and shooting and paid for by the farming sector.

AGAINST

Keep NI Beautiful - Countryside Alliance

Keep NI Beautiful

We strongly disagree with the proposed option of: 'non-selective badger cull using controlled shooting of free roaming badgers, as the predominant badger removal method, delivered and paid for by farmer led companies'. We recognise that badgers have a role in transmitting this disease and acknowledge the current, but limited, scientific evidence that badger culling may help address TB in cattle.

Countryside Alliance

The overwhelming weight of evidence suggests that badgers are not responsible for the vast majority of bovine TB cases. The Northern Ireland Environment Link (NIEL) paper sets this out in considerable detail and points heavily towards the need to improve on-farm biosecurity measures to prevent both intra and inter herd transmission of the disease.

The NIEL paper also clearly shows that culls are ineffective in preventing bovine TB, pointing to the phasing out of non-selective badger culls in England and the replacement of culls in Ireland with a vaccination programme, in both cases following disappointing results from the culls.

Responses from Organisations who have declared an interest

| Yes | No | Not answered |
|-----|-----|--------------|
| 3 | 2 | - |
| 60% | 40% | - |

There were 5 comments, three of the responses were for the proposal and two of the responses were against the proposal.

g) Non bovine organisations

FOR

Ballymac Alpacas; Belfast Alpacas; Northern Ireland Alpacas; Mourne Alpacas.

Belfast Alpacas

This policy has been failing for a long time.

Mourne Alpacas

In the light of proposed mandatory testing and a lack of compensation for removed alpacas, this option, although extreme, would appear to be the only possible road to some method of removing the possibility of infection to a herd.

AGAINST

Alpacas

No comment.

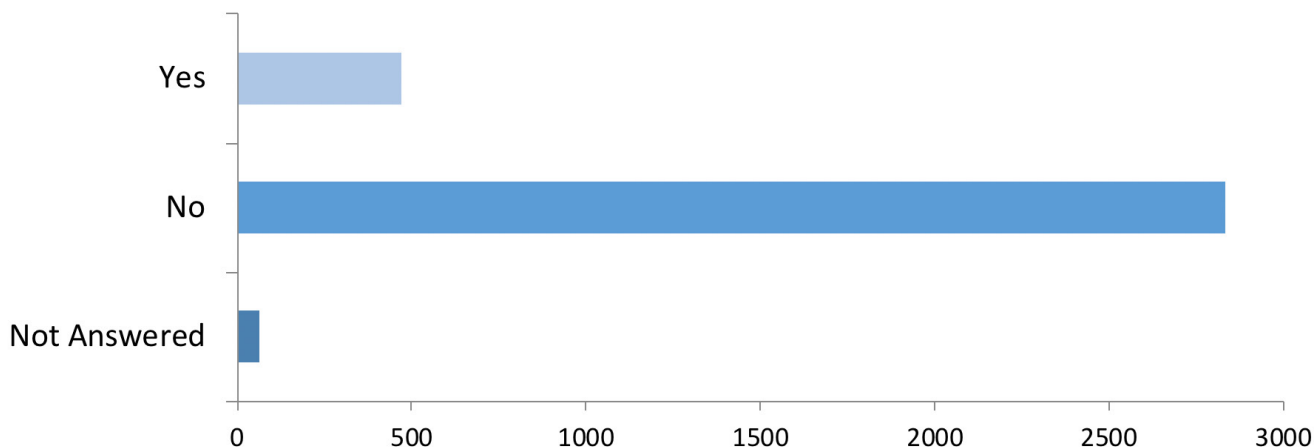
Responses from organisations and businesses who have declared a Non Bovine interest

| Yes | No | Not answered |
|-----|-------|--------------|
| 4 | 1 | 1 |
| 67% | 16.5% | 16.5 |

Q4: Do you agree with the Department's preferred funding model for wildlife intervention?

Stage 1 - Quantitative Analysis

There were **3334** responses to this question.



There were **3,302** responses to this question and there were **497** comments.

| Option | Total | Percent |
|--------------|-------|---------|
| Yes | 469 | 13.93% |
| No | 2,833 | 84.14% |
| Not Answered | 65 | 1.93% |

Stage 2 - Qualitative Analysis

a) Farmers and Farming bodies

All organisations with the exception of NBA were against this proposal.

UFU

The UFU position is that DAERA should fund the physical deployment of wildlife intervention for an initial period in order to establish the success of any such methods. This would also give an opportunity to identify true wildlife population densities within the infected areas and establish exact costs of deployment. This would also provide an opportunity for DAERA to refine their oversight costs.

Whilst our membership would potentially consider contributing to the funding of wildlife intervention after a DAERA funded trial period, this could only be achieved with guarantees that livestock valuation payments would not be reduced.

HNI

Deployment expenses should be covered by the introduction of a levy on all cattle. The levy would reduce and then end as the culled numbers reduce and the scheme completed.

NIAPA

NIAPA believes it will be some time before any results are forthcoming and therefore reserve the right to ask that any new concept be funded by DAERA until they see positive results.

Responses from individual farmers, farm businesses and those who have declared a farming interest.

| Yes | No | Not answered |
|-------|-------|--------------|
| 358 | 1,954 | 13 |
| 15.4% | 84% | 0.6% |

There were **285** comments. Most felt that the Department should pay for wildlife intervention and that it was not fair to introduce extra costs to farmers while proposing a cut in compensation.

b) Veterinary bodies and individual vets

FOR

BCVA and BVA (NI)

BCVA are clear that to control this devastating disease an active partnership between the farmer and their vet is essential, and this should be supported and funded by Government policy, using all the tools available to us, as the evidence indicates.

We have seen that in England the preferred culling option is controlled shooting, and it is crucial that relevant training is undertaken to ensure efficacy, along with effective auditing.

Whilst this is essentially farm funded, the model has seen high levels of engagement and success, in the main because it puts the farmer in control of how it is carried out.

Considering the relative success of this model BCVA would support a similar scheme in Northern Ireland.

BVA (NI) agree with this approach which is an appropriate balance of funding between government and farmers. It is appropriate for government to ensure proper funding of the key aspects which are listed above which are essential for ensuring animal welfare concerns are minimised.

Government should ensure this funding is at an appropriate level to meet these requirements. Seeking deployment costs from farmers is an appropriate step to ensure farmers have a sense of ownership of controlling the disease.

AGAINST

AVSPNI

AVSPNI believe that whoever legislates for and oversees wildlife intervention should also fund it and enforce welfare standards.

Responses from veterinary organisations and individual vets

| Yes | No | Not answered |
|-----|-----|--------------|
| 7 | 12 | 0 |
| 37% | 63% | 0 |

There were **9** comments. Most were against the proposal and felt that the Department should pay for wildlife intervention, with a few comments for the proposal.

c) Environmental community and individuals

RSPB and EB did not answer or provide comments on this proposal. All other organisations are against it.

UWT

The Ulster Wildlife disagrees with the preferred funding model for wildlife intervention. As outlined in the consultation, to bring forward a wildlife intervention, the Department intends to exercise its powers under Article 13 and 47 of the Diseases of Animals (Northern Ireland) Order 1981 [1981 No. 1115 (N.I. 22)] to make subordinate legislation to remove badgers, in an area that the Department may specify. To make an Order under Article 13 "Power to destroy wildlife", DAERA must demonstrate that it is satisfied, in the case of any area:

"That there exists among the wild members of one or more species in the area a disease, other than rabies, which has been or is being transmitted from members of that or those species to livestock of any kind in the area; and "That destruction of wild members of that or those species in that area is necessary in order to eliminate, or substantially reduce the incidence of, that disease in livestock of any kind in the area."

NT

The NT do not agree with the preferred funding model. While the proposed model is the lowest cost option presented, this would still involve large amounts of government funding

to support badger culling, which we believe is inappropriate. Given our concerns over the impacts of culling, and the value in pursuing badger vaccination, we would prefer government funding to be directed to trialing and exploring models of delivering badger vaccination, and as indicated above, further work in relation to TVR.

Individual responses

| Yes | No | Not answered |
|------|-------|--------------|
| 1 | 21 | - |
| 4.5% | 95.5% | - |

Comments included;

As we do not support the preferred wildlife intervention approach, we do not support the preferred funding model for this approach.

d) Responses from individuals with no declared interest

Comments made included;

FOR

I agree that farmers should make a financial contribution in respect of deployment expenses.

Deployment expenses should be covered by the introduction of a levy on all cattle. The levy would reduce and then end as the culled numbers reduce and the scheme completed.

I agree to a degree but there must be strict cost control measures in place.

AGAINST

The government should fully fund this programme as it is yet to be proven to be effective. Due to the poor results achieved so far by Government policies in relation to bTB control it seems premature for Farmers to be funding a scheme which has yet to prove its worth. This should at the very least initially funded in full by government for the first 5years of the scheme followed by review.

If farmers are expected to contribute and lose with lower compensation, then the cull will need to be widespread with long term support from the government to ensure that the cull is allowed to continue for long enough to ensure it effectively eliminates the disease.

Costs of this must be borne by Government not local farmers and livestock owners who just so happen to have wildlife on or near their farm.

A contribution towards funding a wildlife programme at a later date would be more palatable if farmers knew that they would be fully compensated and if the teams carrying out the wildlife intervention had a proven track record.

Livestock valuations must not be reduced. DAERA should fund wildlife intervention from another source not taking funding from valuations.

| Yes | No | Not answered |
|-----|-------|--------------|
| 107 | 812 | 33 |
| 11% | 85.5% | 3.5% |

e) Political representatives

The Workers Party, and all of the political representatives were against this proposal.

The Workers Party

Since the Workers Party opposes the preferred “wildlife intervention” approach, it does not support the preferred funding model for this approach and believes that test vaccinate release options should be further explored to provide a more acceptable way to reduce disease levels in the badger population. The Party is also opposed to the privatisation of “interventions” in any event.

Political representative

I do not support the preferred wildlife intervention approach, there do not support the preferred funding model.

Responses from the political parties and from political representation

| Yes | No | Not answered |
|-----|------|--------------|
| 0 | 7 | 0 |
| 0 | 100% | 0 |

There were **2** comments made one from a political party and one from a political representative explaining that they were against the proposal.

It is felt that this would be effective in changing mind sets by removing the assumption by herd keepers that the tax payer would act as an unlimited safety net. A compensation cap at this level is also a disincentive to high value pedigree cattle fraud. The proposed compensation cap is the same as that set by the Welsh Government.

f) Non-affiliated organisations

FOR

TBEP

We broadly support farmer led badger cull, in areas identified by DAERA, using controlled shooting supplemented by cage trapping and shooting and paid for by the farming sector.

AGAINST

Countryside Alliance

No, on the basis that Keep Northern Ireland Beautiful does not support this option.

Keep NI Beautiful

We do not agree with the preferred funding model. While the proposed model is the lowest cost option presented, this would still involve large amounts of government funding to support badger culling, which we believe is inappropriate.

Given our concerns over the impacts of culling, and the value in pursuing badger vaccination, we would prefer government funding to be directed to trialling and exploring models of delivering badger vaccination, and as indicated above, further work in relation to TVR.

Rural Support

Not convinced by the proposed model for delivery although not opposed to some level of funding from farmers.

Responses from Organisations who have declared an interest

| Yes | No | Not answered |
|-----|-----|--------------|
| 1 | 3 | 1 |
| 20% | 60% | 20% |

There were **4** comments, one of the organisations was for the proposal and three of the responses were against the proposal.

g) Non bovine organisations

FOR

Ballymac Alpacas; Belfast Alpacas; Mourne Alpacas; Northern Ireland Alpacas

Mourne Alpacas

I would agree with this funding model, but would remain concerned that we are completely bio-secure around our perimeter, and would therefore be relying on the action of farmer neighbours to fund that intervention on neighbouring farm lands.

AGAINST

Alpacas

No comment.

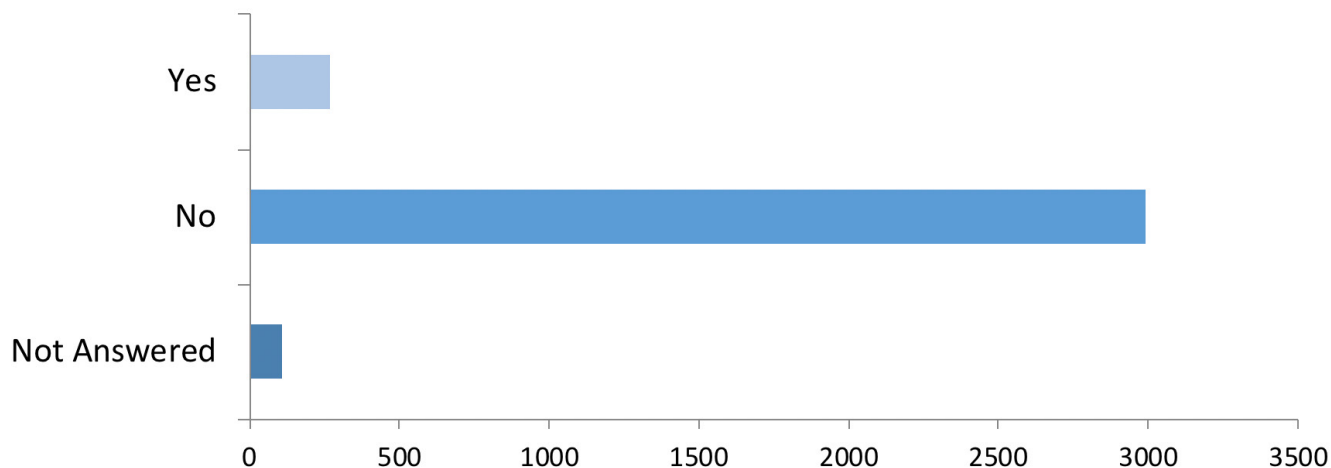
Responses from organisations and businesses who have declared a Non Bovine interest

| Yes | No | Not answered |
|-----|-------|--------------|
| 4 | 1 | 1 |
| 67% | 16.5% | 16.5% |

Q5: Do you agree with the Department's proposal for the introduction of a £5,000 cap on compensation?

Stage 1 - Quantitative Analysis

There were **3,261** responses to this question and **592** comments.



| Option | Total | Percent |
|--------------|-------|---------|
| Yes | 269 | 7.99% |
| No | 2,992 | 88.86% |
| Not Answered | 106 | 3.15% |

Stage 2 - Qualitative Analysis

a) Farmers and Farming bodies

All organisations were against this proposal with the exception of NIGTA.

UFU

The proposal to implement a cap on valuations flies in the face of generations of genetic gain. DAERA cite a saving of £104,500 from the implementation of a cap at the suggested value of £5,000. UFU members feel that this amount of money is relatively modest especially considering NI had sales of processed food to external markets of £4billion in 2018.

DCNI

Any move to cap the compensation rates to farmers should be considered only when control measures, such as those proposed in this consultation, are shown to be effective, and when a sustained reduction in infection rates can be demonstrated.

Responses from individual farmers, farm businesses and those who have declared a farming interest

| Yes | No | Not answered |
|------|-------|--------------|
| 129 | 2,184 | 13 |
| 5.5% | 93.9% | 0.6% |

There were **369** comments. Most stated that this would have an adverse impact on pedigree breeding and was another unfair financial burden on farmers. All organisations were against this proposal with the exception of NIGTA.

b) Veterinary bodies and individual vets

FOR

BVA (NI)

BVA support the principle of a reduction in compensation where there is lack of compliance on the part of the keeper with statutory disease control or accepted best biosecurity practice. We note that unlike recent changes to compensation in Scotland, Wales and England there has been no movement to link reductions in compensation with poor biosecurity or failure to meet legal requirements.

AGAINST

AVSPNI and the BCVA

AVSPNI didn't make a comment.

BCVA

In England there is no cap to compensation, compensation is paid out according to a tabulated average market value. Capping compensation may be perceived as 'a big stick' to influence farmer behaviour.

BCVA would assert that an increased understanding of the science and evidence we have around testing and biosecurity will lead farmers taking proactive measures to reduce their chance or duration of a breakdown.

Along with the financial impact, the emotional and psychological burden of disclosing bTB on farm should not be underestimated - for either the private vet or farmer. The additional challenge that this provides often adds to the sense of despondency that is felt within industry.

This in turn leads to a degree of disengagement with the disease. Inspiring changes in behaviour with greater understand and access to 'no regrets' achievable measures will encourage farmers to take all reasonable steps to tackle disease.

Responses from veterinary organisations and individual vets

| Yes | No | Not answered |
|-----|-----|--------------|
| 3 | 16 | 0 |
| 16% | 84% | 0 |

There were **8** comments. Most stated that this would have an adverse impact on pedigree breeding and was another unfair financial burden on farmers.

c) Environmental community and individuals

All organisations disagree with this proposal.

BT

At present, the refusal of the Government to mandate the most reliable test for bTB (sensitive and specific) automatically condemns farmers to keep infected cattle undetected in their herds - silently infecting clean cattle. This ties the hands of every farmer concerned.

It seems perverse therefore for the Government to penalise farmers for what is an avoidable and predictable Government failing.

USPCA

This proposal should have minimal impact on the agricultural industry with the exception of pedigree breeders who have a higher risk of transmission as they regularly import animals to improve the genetics of the herd.

Individual responses

| Yes | No | Not answered |
|-------|-----|--------------|
| 3 | 9 | 10 |
| 13.5% | 41% | 45.5% |

Comments included;

We feel this a matter for the Department and the industry. The cap will only affect pedigree breeding herds and potentially bulls.

d) Responses from individuals with no declared interest

| Yes | No | Not answered |
|-----|-------|--------------|
| 127 | 755 | 70 |
| 13% | 79.5% | 7.5% |

Comments included;

FOR

Public money must be spent appropriately. Farmers get plenty of subsidies.

Less chance of abusing the system.

Yes, if the cap meant more money could be spent on a TVR scheme.

5k is still too much.

Can an insurance scheme be developed that farmers can avail of/ pay into so that in future 'compensation' no longer comes from the public purse. Also farmers who have not taken all measures to look after the health of their herd should not be compensated.

AGAINST

The cap of £5,000 is not acceptable, and in many cases will only reflect a small proportion of the animal's value. If the top animal in the herd is valued at £5,000, what impact will this have on the rest of the herd's value? The compensation only covers the animal in question. It does not cover loss of earnings and in many cases will not cover replacement cost.

Where is the value for money in administered this cap? I would suggest £20,000 would be fair and reasonable

This would be divisive and only achieve a modest saving.

The potential savings are modest and only take into account an average value. Pedigree and premium producers would be unfairly disadvantaged.

This is crazy, the sector that stands to suffer the most from a TB outbreak are being penalised the most.

Most unfair on those hardest hit.

e) Political representatives

FOR

Political representative

No comment made.

AGAINST

The Workers Party and four Political representatives

No comments were made.

Responses from the Political parties and from Political representation

| Yes | No | Not answered |
|-------|--------|--------------|
| 1 | 5 | 1 |
| 14.3% | 71.4 % | 14.3 % |

There were no comments made, one political representative was for the proposal, one political party and four political representatives were against the proposal. One Political representative did not make any response.

f) Non-affiliated organisations

FOR

Rural Support

This is not unreasonable.

TBEP

We agree with the proposal for the introduction of a £5k cap on compensation.

Not Answered

Countryside Alliance

No set position.

Keep NI Beautiful

Given the relatively small number of herds likely to be affected, we are unsure whether the proposed compensation cap will make a significant impact on disease control in NI at this stage.

Responses from Organisations who have declared an interest

| Yes | No | Not answered |
|-----|----|--------------|
| 2 | 0 | 3 |
| 40% | 0% | 60% |

There were 4 comments two of the responses were for the proposal, one of the organisations was against the proposal. Two of the organisations did not make any response.

g) Non bovine organisations

FOR

Ashtonelle Alpacas

No comment.

AGAINST

Alpacas; Ballymac Alpacas; Belfast Alpacas; Mourne Alpacas; Northern Ireland Alpacas

Mourne Alpacas

Given the value of bloodstock, and the investment in pedigree genetics that we, and very many farmers have made, and continue to make, mandatory testing and removal of stock deemed to be infected, indicated by scientifically unproven tests, we would be very concerned about the impact to livelihoods if compensation is capped at such a low level for quality pedigree animals.

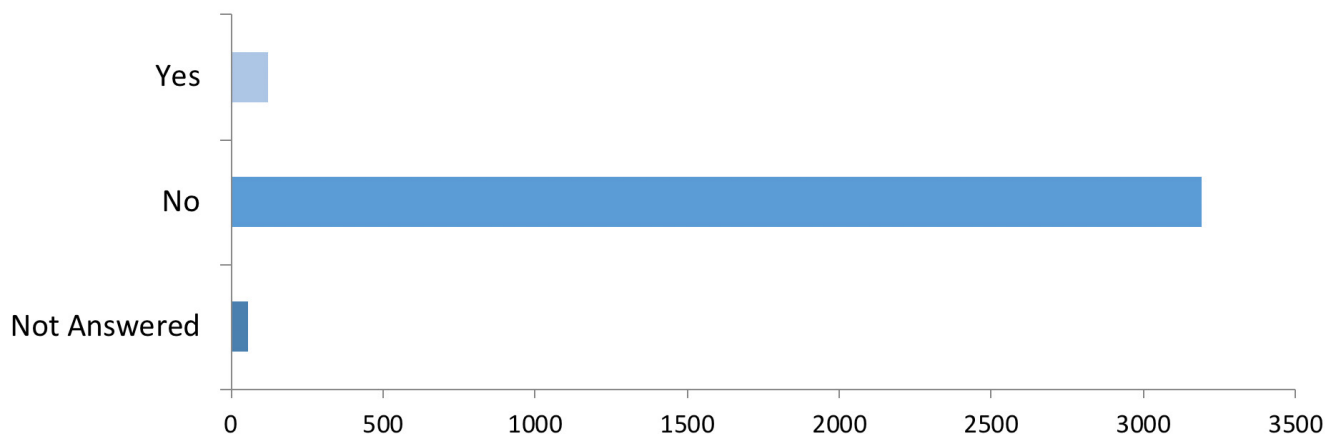
Responses from organisations and businesses who have declared a Non Bovine interest

| Yes | No | Not answered |
|-----|------|--------------|
| 1 | 5 | - |
| 17% | 83 % | - |

Q6: Do you agree with the Department's proposals for a reduction in compensation?

Stage 1 - Quantitative Analysis

There were **3,311** responses to this question and **707** comments.



| Option | Total | Percent |
|--------------|-------|---------|
| Yes | 120 | 3.56% |
| No | 3,191 | 94.77% |
| Not Answered | 56 | 1.66% |

Stage 2 - Qualitative Analysis

a) Farmers and Farming bodies

All farming organisations were against this proposal.

UFU

The UFU believe that the proposed reductions by DAERA would be catastrophic to NI farmers and cannot support this proposal.

BHF

Over the years the Department has failed to get on top of the TB problem and they say they are compensating farmers. All they have been doing is pay market price and call that compensation.

There is no allowance for the loss of income, added costs and stress caused by losing livestock.

NIAPA

In relation to payments made to farmers due to livestock being removed in compliance with legislation we believe there should be no reduction and certainly not in as short a period as advocated.

Responses from individual farmers, farm businesses and those who have declared a farming interest.

| Yes | No | Not answered |
|------|-------|--------------|
| 34 | 2,281 | 11 |
| 1.5% | 98% | 0.5% |

There were **458** comments, most stated that compensation at 100% only covers the cost of the animal and there is no compensation for loss of income.

b) Veterinary bodies and individual vets

FOR

BVA (NI)

We support an approach that rewards responsible behaviours through a system of 'earned recognition' that considers all aspects of the control programme including compensation and testing policy.

AGAINST

AVSPNI

The Department's proposals risk further alienating the farming community. We believe that herd-keepers should be appropriately compensated for the animal's true market value as they already absorb significant additional financial and production losses as a result of any TB breakdown.

A reduction in compensation could only be justified in cases where the herd-keeper has demonstrated disregard for disease control and biosecurity measures.

BCVA

This approach is represented in the Entry Level CHECS Membership scheme, introduced in 2021 and recognised in both England and Wales. This was developed from a concept raised in the Bovine TB Strategy Review (also known as the Godfray review); the idea that cattle farmers could adopt a baseline standard of 'no regrets' biosecurity measures, focussing on reducing the risk of a TB breakdown, with the added opportunity to prove a good standard of biosecurity to customers or purchasers.

Alongside the CHECS TB schemes the British Cattle Veterinary Association (BCVA) have launched some practical online training which will give private vets the knowledge to feel confident advising farmer on topics such as badger ecology.

In England the Government uses membership of the CHECS TB herd accreditation scheme (risk score 1 or above) to identify lower risk herds.

These herds have reduced testing schedules and retain full compensation for reactors in certain situations. Such a scheme demonstrates an evidenced approach to key biosecurity measures, against which compensation can be rewarded.

Responses from veterinary organisations and individual vets

| Yes | No | Not answered |
|-----|-----|--------------|
| 2 | 17 | 0 |
| 11% | 89% | 0 |

There were **11** comments, most were against the proposal and stated that compensation at 100% only covers the cost of the animal and there is no compensation for loss of income.

c) Environmental community and individuals

4 organisations were against this proposal and the other 6 did not answer the question.

UWT

Agree that there needs to be a step change within the agricultural industry in terms of bTB control measures and management practices. There is no excuse for farmers who take risks (calculated or unknowingly due to lack of knowledge) which impact on other farmers or unnecessarily rely on tax payers money for risk mitigation.

However, we also appreciate the significant gaps in science that make it difficult for farmers to understand and have confidence in best practice recommendations. It is also acknowledged that some risk factors will be outside their control.

They suggested that if the cattle to cattle controls are effectively adopted by the agricultural industry as per the consultation, combined with the increased use of interferon gamma testing, this should directly deliver significant cost reductions in terms of the requirement for public funds within a relatively short time frame (3-5 years). When coupled with the compensation ceiling per animal, this negates the need for reductions in compensation at a time of flux for farmers as the replacement for the Common Agricultural Policy develops.

NIEL

NIEL supports the Ulster Wildlife position.

BT

If the shortcomings in the system are addressed, then we would support moves to change the compensation scheme into an insurance scheme, farmer informed and shaped.

USPCA

The importance of tackling bovine TB and public pressure to do so, has increased greatly following the publication of the NI Audit Office Report highlighting the annual cost to the public purse of circa £40m with no evidence that the figure was likely to reduce. Disappointingly, part of the Department's strategy is to reduce cost by lowering the compensation to those facing the personal trauma of losing their herd and having to manage the associated negative impact on their income.

The USPCA views this approach as punitive, short sighted and potentially damaging to the delivery of a successful eradication strategy. Indeed, it could be argued that it also undermines any belief stakeholders should have in the Department's confidence that the proposed intervention measures will reduce the cost to the public purse by tackling the disease successfully.

Individual responses

| Yes | No | Not answered |
|------------|-----------|---------------------|
| 2 | 17 | 3 |
| 9% | 77% | 14% |

Comments included;

Farmers will need compensation for their losses, more so as testing will be increased.

As the increased use of interferon-gamma testing will increase the number of animals identified as infected and these will subsequently be removed, it is important that farmers are supported through this transition. The new testing regime should help to provide long-term sustainable benefits.

d) Responses from individuals with no declared interest

| Yes | No | Not answered |
|------|-------|--------------|
| 80 | 842 | 30 |
| 8.5% | 88.5% | 3% |

Comments included;

Farmers will need compensation for their losses, more so as testing will be increased.

FOR

Currently we are just throwing good money after bad.

Yes, but greater acceptance might be secured if the monies saved by the use of the compensation cap and the phased reduction in compensation could be transferred to an escrow account to be used exclusively for TVR.

AGAINST

If you want farmers to cooperate then you must pay the full market value of the animals. Otherwise this is legalised theft!

The proposed reduction in valuations is not viable. There is no consideration for loss of revenue streams from affected animals and reduction in valuations is not viable.

This could result in great hardship for farmers as currently, not only do they lose their animals, which I appreciate they get compensation for. But there do not get anything for the potential loss of income from what that animal could produce be that milk or beef.

Absolutely not - current compensation only covers the loss of the beast not the lost opportunity of gain from the animal and in way thinks of the mental anguish experienced by the farm family.

e) Political representatives

FOR

Political representative

Agree with reduction, but only those farmers who do not follow best practice farm biosecurity.

Farmers with enhanced biosecurity measures should not be penalised in the same way. Compensation and best practice should be linked.

AGAINST

The Workers Party and four political representatives

No comments were made.

Responses from the Political parties and from Political representation

| Yes | No | Not answered |
|-------|-------|--------------|
| 1 | 5 | 1 |
| 14.3% | 71.4% | 14.3% |

There was **1** comment made. One Political representative was for the proposal; one political party and four political representatives were against the proposal. One political representative did not make any response.

f) Non-affiliated organisations

AGAINST

TBEP

We do not agree with the Department's proposals for a reduction in compensation in its current form. Whilst TBEP would express qualified support for the proposed funding model, we understand the need and recognise the benefits of stakeholder contribution.

We have however, concerns that this will add an additional cost burden on to the sector and we believe that any new costs should be reasonable and proportionate with the aim of reducing these as disease levels fall.

We strongly feel that a more balanced and sustainable reduction, given that the industry would be tasked with funding the wildlife intervention, would be a 0% decrease in years 1 - 3 followed by a 10% reduction in years 4 & 5 with a review of the incidence rates and funding mechanisms at that time.

Rural Support

Reductions in compensation will be damaging to affected farmers and is not appropriate given the current prevalence of TB breakdowns. Compensation rates need to be maintained to prevent cash flow issues on farms.

Dairy farmers in particular can suffer serious loss of income between destocking and restocking and their financial viability can be at risk even where full valuation is paid. Cash flow problems of this nature are often funded by extended merchant credit for feed and fertiliser.

Often stock have to be retained on farms which would otherwise be sold and input costs increase while the farmer's ability to repay is reduced. The supply trade have a significant role in supporting farmers whose income has been restricted in these circumstances.

Reducing compensation will reduce the viability of these businesses and send a negative signal to those who fund them through bank overdraft or trade credit. The ruminant sector in Northern Ireland consume around 1.5 million tonnes of feed per annum with the trade extending credit of around £50 million.

Not Answered

Countryside Alliance

No response was made to the question but they did make a comment.

Keep Northern Ireland Beautiful agrees with NI Public Accounts Committee (PAC) that has previously argued that compensation, at whatever level is agreed, should be linked to adherence with appropriate biosecurity measures.

Keep NI Beautiful

There are significant changes to the bTB programme indicated within the proposals in the consultation document which in the short term could increase the number of cattle slaughtered.

There are also increasing demands on livestock keepers in relation to herd management and biosecurity measures. We therefore believe that any proposed changes to compensation, and the timing of these changes, should be agreed in consultation with the farming community.

Responses from Organisations who have declared an interest

| Yes | No | Not answered |
|-----|-----|--------------|
| - | 2 | 3 |
| - | 40% | 60% |

There were 5 comments. Three responses were against the proposal and two of the organisations did not make any response.

g) Non bovine organisations

FOR

Ashtonelle Alpacas

No comment.

AGAINST

Alpacas; Ballymac Alpacas; Belfast Alpacas; Mourne Alpacas; Northern Ireland Alpacas

Mourne Alpacas

Given the value of bloodstock, and the investment in pedigree genetics that we, and very many farmers have made, and continue to make, mandatory testing and removal of stock deemed to be infected, indicated by scientifically unproven tests, we would be very concerned about the impact to livelihoods if compensation is capped at such a low level for quality pedigree animals.

Responses from organisations and businesses who have declared a Non Bovine interest

| Yes | No | Not answered |
|------------|-----------|---------------------|
| 1 | 5 | - |
| 17% | 83% | - |

8. Summary

The Department notes:

- The general support to introduce testing for non-bovines;
- General support for the principle of wildlife intervention addressing the role of badgers in the spread of bTB. That there is substantial support from those within the farming community and some veterinary organisation to the approach proposed within the consultation but that those from the environmental community are opposed to this proposed methodology.
- That whilst there is broad support for the increased use of gamma interferon testing to detect bTB in cattle, there are concerns about the criteria as currently proposed and how this is applied;
- That generally both the farming community and environmental community are not supportive of the funding model for wildlife intervention;
- That there is a majority not in favour of the proposed £5,000 compensation cap; and
- That there is a majority not in favour of proposed reduction in compensation with many making the point that this should be linked to poor practice in biosecurity.

8.1 Summary by identified type

The majority of responses would indicate that in summary, the responses from those identifying as being from the **farming community** were:

- against the proposed criteria for herd selection for gamma testing;
- supported the introduction of testing for non-bovines;
- supported the proposal for wildlife intervention;
- against the wildlife intervention funding proposals;
- against the introduction of a £5,000 compensation cap; and
- against the reduction of compensation.

In summary the responses from those identifying as being from the **environmental community** were:

- supported the proposed criteria for herd selection for gamma testing;
- supported the introduction of testing of non-bovines;
- against the proposals for wildlife intervention;
- against the proposals for wildlife intervention funding;
- against the £5,000 compensation cap; and
- against the reduction of compensation.

In summary the responses from those identifying as being from **veterinary bodies** were mixed dependent on the organisation:

- against the proposed criteria for herd selection for gamma testing, though supportive of the value of gamma testing;
- supported the introduction of testing of non-bovines;
- supported the proposals for wildlife intervention, though the AVSPNI are against the approach;
- against the proposals for wildlife intervention funding, though the AVSPNI believe that whoever legislates for intervention should fund it;
- against the £5,000 compensation cap; and
- against the reduction of compensation, though BVA did support action to reward responsible behaviour.

In summary the responses from those identifying as **individuals** were:

- against the proposed criteria for herd selection for gamma testing;
- supported the introduction of testing of non-bovines;
- supported the proposals for wildlife intervention;
- against the proposals for wildlife intervention funding;
- against the £5,000 compensation cap; and
- against the reduction of compensation.

In summary the responses from those identifying as being from a **political party** were:

- evenly split on the proposed criteria for herd selection for gamma testing;
- supported the introduction of testing of non-bovines;
- against the proposals for wildlife intervention;
- against the proposals for wildlife intervention funding;
- against the £5,000 compensation cap; and
- against the reduction of compensation.

In summary the responses from those identifying as being from **non-affiliated organisations** were:

- supported the proposed criteria for herd selection for gamma testing;
- supported the introduction of testing of non-bovines;
- against the proposals for wildlife intervention;
- against the proposals for wildlife intervention funding;
- supported the £5,000 compensation cap; and
- against the reduction of compensation.

In summary the responses from those identifying as **non-bovine organisations** were:

- against the proposed criteria for herd selection for gamma testing;
- against the introduction of testing of non-bovines;
- supported the proposals for wildlife intervention;
- supported the proposals for wildlife intervention funding;
- against the £5,000 compensation cap; and
- against the reduction of compensation.

9. Way forward

This consultation, and the significant response to it, form a key part of the information necessary to enable final decisions to be made on the next steps for the bTB Eradication Strategy.

Other key considerations included, but are not limited to, the significant amount of scientific evidence and research available; the 2016 Report and recommendations of the TB Strategic Partnership Board; the independent advice provided by the TB Eradication Partnership; the experience of other jurisdictions across the UK, Ireland and internationally; the detailed business case and the DAERA veterinary and policy advice.

In addition to this the necessary environmental assessments are being conducted early in the New Year with associated targeted stakeholder engagement to be progressed by the consultants engaged to complete this work.

All of this will enable the Minister to then make decisions as we seek to advance our key aim of setting Northern Ireland on the path to eventual eradication from bovine Tuberculosis.

Appendix A

List of consultation respondents (excludes individual respondents)

| | |
|---|---------|
| Agricultural Consultants Association (Northern Ireland) | ACANI |
| AgriSearch | |
| Alpacas | |
| Ashtonelle Alpacas | |
| Association of Veterinary Surgeons Practising in Northern Ireland | AVSPNI |
| Badger Trust | BT |
| Ballymac Alpacas | |
| Belfast Alpacas | |
| Belfast Hills Farmers | BHF |
| Born Free | BF |
| British Cattle Veterinary Association | BCVA |
| British Veterinary Association (Northern Ireland) | BVA(NI) |
| Countryside Alliance Ireland | CAI |
| Dairy Council for Northern Ireland | DCNI |
| Eurobadger | EB |
| Farmers for Action | FFA |
| Holstein Northern Ireland | HNI |
| Keep Northern Ireland Beautiful | KNIB |
| Livestock and Meat Commission | LMC |
| National Beef Association | NBA |
| National Trust | NT |
| Northern Ireland Agricultural Producers Association | NIAPA |
| Northern Ireland Alpacas | |
| Northern Ireland Badger Group | NIBG |
| Northern Ireland Blonde Cattle Club | NIBCC |
| Northern Ireland Environment Link | NIEL |
| Northern Ireland Grain Trade Association | NIGTA |
| Northern Ireland Meat Exporters Association | NIMEA |

| | |
|---|--------|
| Mourne Alpacas | |
| Pedigree Cattle Trust | PCT |
| Royal Society for the Protection of Birds | RSPB |
| Royal Ulster Agricultural Society Cattle Committee | RUASCC |
| Rural Support | RS |
| South Antrim Dairy Group | SADC |
| TB Eradication Partnership | TEBP |
| Ulster Farmers Union | UFU |
| Ulster Society for the Prevention of Cruelty to Animals | USPCA |
| Ulster Wildlife Trust | UWT |
| Woodland Trust | WT |
| Workers Party | WP |

Bovine TB Consultation TBBR Policy Team
Animal Health & Welfare Division
Department of Agriculture, Environment and Rural Affairs
Ballykelly House
111 Ballykelly Road
Ballykelly
Limavady
BT49 9HP

www.daera-ni.gov.uk



Department of
**Agriculture, Environment
and Rural Affairs**

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