



**An Integrated Eradication Programme**

## **TBSPG Background Thinking Paper**



# **GOVERNANCE**

## 1. Issue

Currently bTB policy and the bTB programme operating in Northern Ireland are developed and delivered by DAERA. The Department leads on policy change and development which is endorsed by the DAERA Minister. Budgetary control and operational delivery is through DAERA. DAERA is also the Competent Authority with respect to the EU.

The statutory testing of animals is carried out by contracted private veterinary practices (PVPs) and DAERA vets, with PVPs completing the majority of herd testing.

There are limited mechanisms for input to the bTB programme by other stakeholder groups, such as the farming industry and nature conservationists. There is a level of engagement through groups such as the Animal Health and Welfare Stakeholder Forum and the TB Stakeholder Forum, which include a wide range of industry and veterinary representatives, as well as DAERA officials. However these groups mostly serve as advisory and information sharing platforms rather than providing significant two-way policy direction input or oversight of the bTB programme.

Interaction with stakeholders in respect of policy development currently tends to be on a reactive basis in response to issues, as opposed to being proactive, in planning the way ahead in disease control. When stakeholder input is sought in relation to policy development, it is mostly by way of informal and ad hoc arrangements whereby DAERA meets with representative bodies such as the Ulster Farmers' Union, Livestock and Meat Commission, Northern Ireland Meat Exporters Association, milk processors and environmental bodies.

Conversations do take place at a local level between farmers, vets and the Divisional Veterinary Officer. These are helpful but the decision-making in relation to any action or approach to deal with bTB incidents remains with DAERA as the Competent Authority.

The bTB programme is something which happens to farmers rather than farmers and other key parties being able to influence the policy and strategy in relation to that programme. Particularly at a local level, farmers can feel distanced from the efforts to eradicate bTB and are only engaged when a breakdown occurs.

There is a requirement for DAERA to consult with the Council for Nature Conservation and the Countryside (CNCC) as a statutory advisory body. At present, the CNCC has 10 members with a wide range of environmental expertise and experience throughout Northern Ireland and further afield. Its role as statutory advisor is to advise DAERA on matters affecting nature conservation and the countryside.

In England and in Wales there are structures in place which give greater direct involvement to other stakeholders, including farmers, regarding the delivery of bTB strategies in those countries.

## **2. Recommendation**

It is recommended that a new governance structure is put in place, to include a Northern Ireland level oversight body, three regional bodies and local disease response groups. These should involve representatives from the farming industry working in partnership with veterinarians, DAERA, bTB scientific experts, nature conservationists and other key stakeholders. It should, at all levels, operate under principles of active participation by all, have a focus on disease eradication, and a remit to influence policy and bTB control at a NI level.

## **3. Rationale for change**

A common issue reoccurring in responses to our consultations indicated that the current approach and structures encourage industry to view the programme as a government-imposed requirement as opposed to any coordinated attempt to reduce and eradicate bTB.

It was clear to us that, without organised and structured engagement and an active role for stakeholders, the bTB control programme would continue in this vein. We have heard repeatedly that changing the way in which government engages with others will transform the focus from one of testing to one of eradication of the disease itself.

We consider that the key to successful control and eradication is to ensure that efforts to eradicate bTB are a shared responsibility and aim. We consider that, at present, this is not the case. The farming industry and other key stakeholders need to have a meaningful partnership and active input to policy and programme development alongside government at a regional and a local level.

For this to succeed there needs to be shared ownership of - and common commitment to - a strategy to eradicate bTB. Therefore, it is vital to ensure that any governance arrangements associated with this Strategy must represent a genuine partnership approach with the farming industry, government, veterinarians, nature conservationists and other key stakeholders operating under the principle of shared responsibility for the delivery of an agreed bTB Eradication Strategy.

## **4. Evidence**

Throughout 2015-2016 we met with a broad range of representatives from the farming industry, private veterinary practices, nature conservation groups and with DAERA staff, both at a central and local level.

In addition, the Group has received information from - and spoken with - other government bodies from England<sup>1</sup>, Wales<sup>2</sup>, the Republic of Ireland and New Zealand, learning about how structures in relation to bTB eradication operate in each jurisdiction. A recurrent theme throughout these engagements has been the importance of the promotion of direct

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<sup>1</sup> English TB eradication strategy - [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/300447/pb14088-bovine-tb-strategy-140328.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300447/pb14088-bovine-tb-strategy-140328.pdf)

<sup>2</sup> Welsh TB eradication strategy - <http://gov.wales/topics/environmentcountryside/ahw/disease/bovinetuberculosis/bovinetberadication/?lang=en>

involvement of other stakeholders, particularly the farming industry, in being able to influence how bTB policy and action is developed, agreed and delivered.

At a governance level in England, Defra Ministers have overall responsibility for bTB policy. The Animal Health and Welfare Board for England (AHWBE) comprises external members representing major stakeholder interests and senior government officials. It was established in 2011 as the principal source of Departmental advice to Defra Ministers on all strategic health and welfare matters relating to kept animals in England. The Bovine TB Eradication Advisory Group for England (TBEAG) is an AHWBE sub-group, which brings together a range of interested parties who share the desire to tackle bTB. The English bTB Eradication Strategy was developed through a collaborative partnership and discussion approach between Defra and TBEAG. Delivery of bTB control rests with government agencies such as the Animal and Plant Health Agency (APHA), local authorities, the private and voluntary sectors, e.g. veterinary and farming businesses, and wildlife interest groups.

The Welsh TB Programme is overseen by the TB Eradication Programme Board. The Board provides overall direction and management of the TB Eradication Programme for Wales. It is chaired by the Welsh Chief Veterinary Officer. The Board also includes representation from the farming industry, veterinary profession, APHA and Welsh Government. In addition, three Regional TB Eradication Delivery Boards were established in 2008 to ensure that delivery is effective and reflects local conditions. These Boards include representatives from the farming industry including farmers, vets, auctioneers, Local Authority Trading Standards, and APHA.

The New Zealand government has delegated management of the National bTB Pest Management Plan, which is defined in law, to an industry-led management agency, OSPRI. OSPRI supports a number of TBfree Committees to maintain effective links with the farming community and stakeholders at a regional level. The TBfree Committees promote the programme in their regions and provide a channel for feedback and advice to OSPRI on policy and operational issues. The TBfree programme receives a level of government funding, however much of its resource comes from the industry itself. The TBSPG recognise that the position in Northern Ireland is significantly different from that in New Zealand but there are aspects that could be developed here in the future with greater industry engagement and support.

We have considered the application of each of these models in the context of the situation in Northern Ireland. The models in England and Wales are perhaps most relevant to our situation and we have met with representatives of the governance structures operating there. We have sought to take the information and experience gathered from these discussions and use this to modify and develop our recommendations to fit within the context and disease situation in Northern Ireland.

## 5. Detail

### 5.1 Oversight

In the new proposed governance structure, the delivery of an agreed bTB Eradication Strategy, and the development of the policy and direction of the Northern Ireland bTB programme, should be overseen by a newly established TB Eradication Partnership (TBEP).

The TBEP should be an oversight and advisory body which should, under a Memorandum of Understanding (MoU), work in partnership with the DAERA Minister, Chief Veterinary Officer of Northern Ireland (CVO) and DAERA officials. The CVO should work with the Group to agree the future trajectory of the bTB Eradication Strategy and the setting of bTB eradication targets and milestones.

The TBEP, comprising 7 individuals, should be established as a result of a public advertisement and recruitment process to be undertaken in accordance with the principles contained in the Code of Practice for Ministerial Public Appointments in NI, published by the Commissioner for Public Appointments in Northern Ireland (CPANI). Appointments should be subject to the approval of the Minister of Agriculture, Environment and Rural Affairs.

4 of the members should be appointed for an initial 3 year term, with the remainder appointed for an initial 5 year term. This would prevent the whole group coming to an end at the same time. Appointees should not serve more than 2 terms.

The suggested membership of the TBEP should be as follows:

- An independent chair;
- Two representatives from the farming community;
- A representative from the processing sector;
- A nature conservationist;
- A Private Veterinary Practitioner; and
- A scientist with an appropriate background relevant to bTB.

All posts should be subject to ratification by the DAERA Minister and should be appropriately remunerated.

In addition two senior DAERA officials, the CVO and the Director of Animal Health and Welfare Policy Division, should attend the TBEP as ex-officio members.

While members of the TBEP may be representative of sectoral interest(s) they should be required to act in the public interest as members of the TBEP.

The overall primary objective of the TBEP should be to work together collaboratively and in partnership with government and stakeholders to effect the eradication of bTB from Northern Ireland. The TBEP should input into and review the further development of the

bTB Strategy, subject to Ministerial direction and approval. The TBEP should formally review the TBSPG Strategy and Implementation Plan, as well as its own role, every 5 years.

Specifically it should:

- work closely with DAERA to support the implementation of an agreed Northern Ireland bTB Eradication Strategy;
- provide a high level collaborative interface between the key players;
- have input into the setting of goals to ensure the trajectory of the programme towards eradication is established and maintained;
- have responsibility for reviewing targets for control, reduction and eradication of bTB; have oversight responsibilities in relation to the delivery of the bTB Eradication Strategy and related targets
- work in partnership with DAERA and all key stakeholders on the future development and communication of the Strategy;
- consider reports from and, if appropriate, act on recommendations from the Regional Eradication Partnerships (REPs);
- consider scientific findings and facilitate dissemination of information to other groups; and
- work with DAERA to deliver an effective communication strategy.

The attendance of senior DAERA officials and the operation under the aforementioned MoU should provide a mechanism through which the TBEP should be able to review those aspects of the programme that DAERA delivers.

The TBEP would meet on a regular basis, currently estimated as monthly, but determined by the chair and members as and when required.

A secretariat function should be provided for the TBEP by DAERA.

It should not have executive functions, have any budgetary or expenditure role other than review and advice.

## **5.2 Regional**

It is recommended that Regional Eradication Partnerships (REPs) are established. Currently DAERA veterinary operations are carried out under the management of 6 Divisional Veterinary Offices (DVOs) and it would be possible to have a degree of co-terminosity across DVO boundaries allowing for 3 Regional Eradication Partnerships. Members should be appointed through a public advertisement process.

Membership of the REPs should be as follows:

- An independent chair;
- 2 farmers from the region;
- A Private Veterinary Practitioner; and
- A nature conservationist from the region.

In addition, meetings should be attended by the relevant regional DVO(s) and a DAERA epidemiologist as ex-officio members as necessary.

It is envisaged that the TBEP should have a role in the selection of members to sit on the REPs.

While members of the REPs may be representative of sectoral interest(s) they should be required to act in the public interest as members of the REP.

The REP's key objective should be to work together collaboratively and in partnership with government and stakeholder interests to effect the eradication of bTB in the region. It should also provide advice and feedback to the TBEP.

Specifically the REP should work in partnership to:

- Have an overview of disease incidence;
- Monitor action and responses to control and reduce disease;
- Examine the impact of disease risk factors and recommend appropriate control measures to DAERA and the TBEP as appropriate;
- Review reports from local Disease Response Teams (DRTs) and recommend appropriate actions;
- Report to the TBEP including recommendations for action to enhance control;
- Disseminate information to stakeholders in relation to the implementation of the bTB Eradication Strategy; and
- Provide a forum where key players can collaborate.

The REP should meet on a regular basis, currently estimated as quarterly, but determined by the chair and members as and when required. It would also convene in response to severe disease outbreak within their region. Posts would be non-remunerated but out-of-pocket expenses should be payable.

### **5.3 Local**

It is recommended that at a local level, where the local DAERA Veterinary Manager considers that it would be beneficial to disease control in the area, Disease Response Teams (DRTs) are established. These DRTs should be formed on an ad hoc basis and have the objective of providing local direct involvement in disease control. These teams should provide the opportunity to share information on bTB breakdown, response actions

and options, seek local support and engagement to address the disease and protect other local herds.

DRTs may be established by the DAERA Veterinary Manager in response to a serious outbreak, repeated breakdowns in the area or to deal with particular disease issues.

The DRTs should seek to include the following, as deemed appropriate in response to the local situation and circumstances:

- A local DAERA Veterinary Manager who would act as convenor and chair;
- Relevant farmers in the affected area;
- Private Veterinary Practitioners working with affected farms;
- Representatives from local nature conservation groups; and
- Others as deemed appropriate, which might include a representative of the local livestock markets, processor or contractors.

The DRT's task should be to:

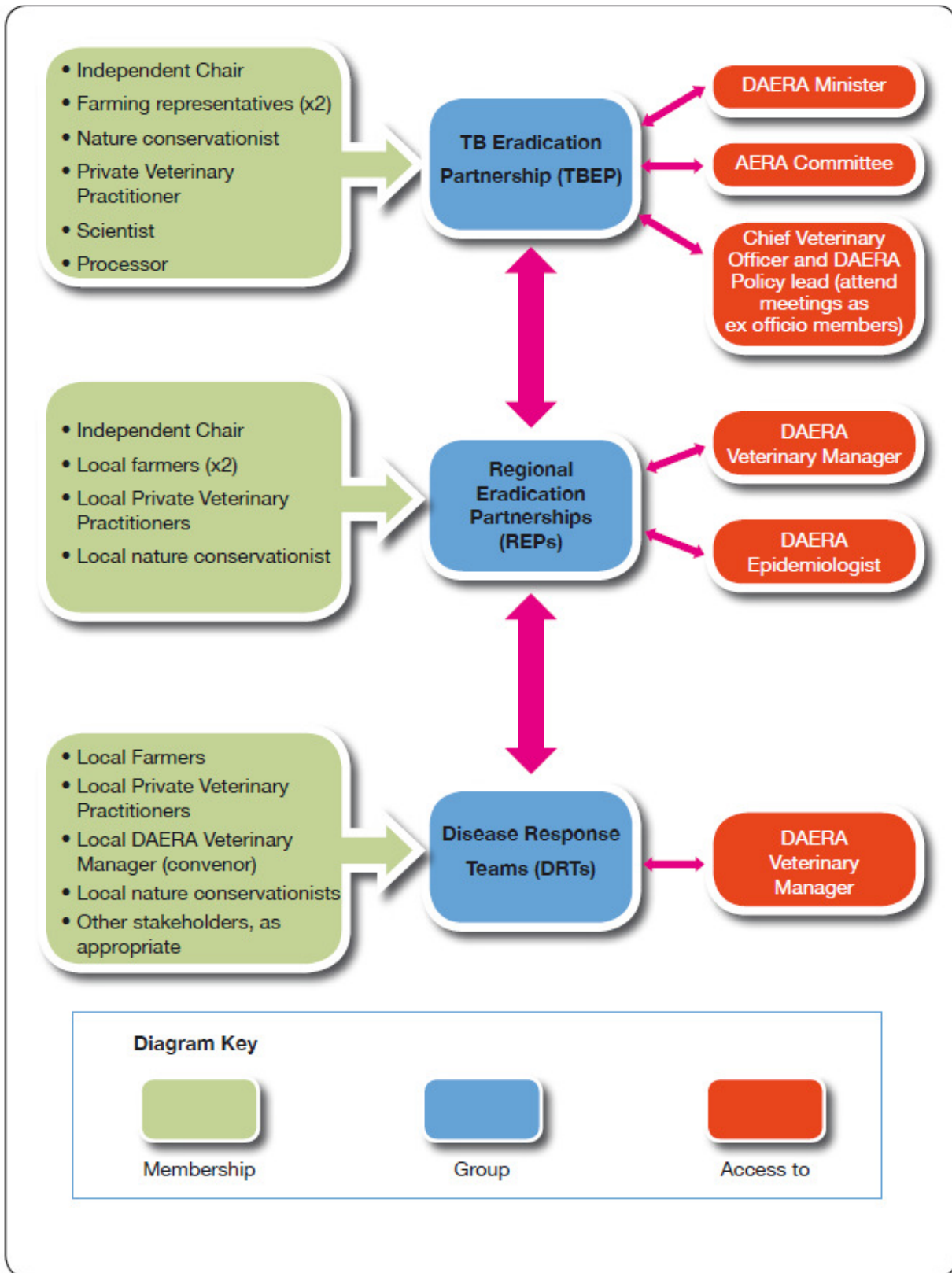
- Bring relevant farmers together to discuss how best to implement disease control and eradication of disease in the local area in response to a severe or ongoing breakdown;
- Review farm interactions, land ownership, disease and contact dynamics, biosecurity, and contractor behaviour;
- Consider animal movements in the area and contact between farms; and
- Discuss relevant issues, make recommendations as deemed appropriate, and report to the REP.

The diagram below illustrates the interaction of the various components of the governance model related to the implementation and delivery of a future bTB eradication Strategy.

The role and function of the components are discussed below.



# Proposed Governance Structures Diagram



## **6. Impact**

It is clear to us that, partly due to the absence of an organised and proactive role for stakeholders, bTB is considered by some sections of the farming community to be a 'government issue' with aspects of the bTB programme being 'government-imposed' punitive measures. This lack of shared ownership of the bTB problem is a contributing factor to the ongoing prevalence of this disease.

A new structure and a fresh approach to dealing with bTB in Northern Ireland is viewed by us as providing a clear signal that this is a new beginning to collectively working towards bTB eradication. It establishes a clear demarcation between what has gone before and what should be the approach in future. This is seen as important to ensuring the positive engagement of the farming industry.

We consider that the new governance structure would have the effect of engendering greater engagement by the farming industry and other key stakeholders, in working with government, to eradicate bTB through a collaborative and partnership approach rather than one that is perceived as being driven solely by government.

It is anticipated that greater direct involvement by farmers, PVPs and DAERA staff would result in a better coordinated and more effective use of resources, through much improved communication.

This widened scope should facilitate the engagement of local farming communities, representative bodies and other key stakeholder groups, and afford them the opportunity to input into and influence the direction of policy development across all levels of the bTB Eradication Strategy. It represents a genuine opportunity for wider ownership of the bTB problem and a renewed vigour to eradicate it.

We consider that closer partnership between all the key players, from local farmers to regional bodies, should work to increase acceptance, understanding and compliance with a new Strategy.

## **7. Timeline**

As a transitional arrangement, following the launch of a new Strategy and consideration by the DAERA Minister, the TBSPG should continue in its role as the oversight and monitoring body until the TBEP is established, at which point the TBSPG will have fulfilled its role and will stand down.

Discussions should be held with relevant representative bodies in relation to the recruitment process for the TBEP and the REPs.

In addition to considering governance models operating in other countries and regions, we have considered advice from the Commissioner for Public Appointments in Northern Ireland (CPANI) in respect of the formulation of this proposed structure. All appointments to the TBEP should seek to follow the Principles of Public Appointments.

A timescale for the establishment of the TBEP, should the Minister accept our recommendation, would be approximately 6 months.

Whilst expressions of interest to participate on the TBEP and the REPs may be sought in parallel, the REPs should be established following the set up of the TBEP, as it is envisaged that the TBEP would have a role in the selection of REP members.

DRTs would then be established at the discretion of local DAERA Veterinary Managers but would not be in situ before the set up of the REPs.