

**Report of the TB Advisory Group produced for Ben Bradshaw
and the Chief Veterinary Officer, Debby Reynolds**

**PRE-MOVEMENT TESTING
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Introduction

Background

1. The Chairman of the TB Advisory Group was appointed by Ministers in July 2006. Members were then appointed and the Group was established in October 2006. One of the roles of the Group is to advise Defra Ministers and the Chief Veterinary Officer (CVO) on development and implementation of bovine TB control policies in England providing, in particular, a practical perspective. Although the TB Advisory Group is tasked with looking at policies in England, the Group will also build links with the England Implementation Group, Wales TB Action Group and interested parties in Scotland.

Scope of this report

2. In response to a request from Defra, this report sets out the Group's advice to Defra Ministers and the CVO on the practical delivery and impacts of pre-movement testing, both in terms of the current policy (phase I - applied to cattle over 15 months) and looking ahead to extension to all cattle over 42 days of age next March (phase II). This report represents the views of all Group members. In developing this advice, the Group was informed by the evidence and analyses presented by Defra to stakeholders at the meeting on 1 December, the views expressed there by stakeholders and our separate, wider discussions with interested parties. The Group has also considered Defra's *Consultation on amendments to the Tuberculosis (England) Order 2006 in relation to Exempt Markets and other minor changes*.

Summary

3. The Group's consideration of pre-movement testing was undertaken in isolation from other TB control measures. It must, nevertheless be seen as part of the overall programme to control spread of TB within the cattle population. The Group supports the pre-movement testing policy as a means of reducing the risk of spread of TB through cattle movements. The Group recognise that the evidence to date from implementation of phase I fits well with the impacts predicted in the Regulatory Impact Assessment (RIA) completed when the policy was first developed. However, more time is needed to see the epidemiological impacts of the measure. We also note that it is more costly to prevent incidents arising from younger animals than older animals due to their lower incidence of TB.

4. The Group was not asked to advise on whether or not phase II should go ahead. The Tuberculosis (England) Order 2006 brings into effect extension of the policy in March 2007. The Group has nevertheless looked carefully at the evidence to support this and recognise the strength of concern from parts of the farming industry over the cost of extending pre-movement testing.

5. There are a number of areas where the Group makes **recommendations** to improve the practical delivery of the policy.

- I. The Group recommends that, for the longer term, Defra considers using, and making available for private use, the gamma interferon blood test as an alternative, and/or an adjunct, to the skin test for pre-movement testing.
- II. The Group recommends that Defra encourages industry to develop further their proposals for the use of stickers on the cattle passport to identify TB test status and considers facilitating implementation.
- III. The Group recommends that the State Veterinary Service (SVS) review their procedures for registering Local Veterinary Inspectors (LVIs) in order to allow more flexibility and mobility within the veterinary profession to tackle the seasonal pressures on TB testing in particular localities.
- IV. The Group recommends Defra and SVS work closely with the key farming and veterinary organisations to communicate the importance of forward planning for TB tests.
- V. The Group recommends further publicity to raise awareness of Exempt Finishing Units (EFUs), particularly amongst buyers in areas where cattle are traditionally taken for finishing.
- VI. The Group recommends that the SVS raises awareness of their advice on how to manage the pre-movement testing rules when moving cattle to and from grass keep.
- VII. The Group recommends that Defra review its advice booklet *Dealing with TB in your herd* to ensure it gives clear advice on roles and responsibilities in the event of welfare issues arising in herds under movement restrictions.
- VIII. The Group also recommends that the exemption from pre-movement testing for moves within Sole Occupancy Authorities (SOAs) should be reviewed as a matter of urgency, in light of the disease risks from these movements.
- IX. The Group recommends strongly that there continues to be a co-ordinated approach to pre-movement testing policy in England and Wales.
- X. The Group recommends Defra and industry seek to raise awareness of best practice in terms of disease prevention.

- XI. **The Group recommends that practical operation of pre-movement testing policy is kept under review by Defra and that adjustments are made as necessary to improve effectiveness. However, the Group recommends that a formal review of the impacts of the policy is initiated 2 years after the introduction of pre-movement testing (for example, in March 2008) when more data on impacts will be available.**

Consideration

General

6. The Group recognise the strength of feeling in parts of the country over the question of whether badger culling should form part of an overall TB control programme but agreed it was important to look at the evidence for the pre-movement testing policy in isolation from that debate. On that basis, and considering disease control principles, the Group supports pre-movement testing of cattle in England as a means of reducing the risk of spread of bovine TB through cattle movements.

Value of the TB testing procedure

7. The Group appreciates that the tuberculin skin test is currently the best basis for pre-movement testing. **The Group recommends that, for the longer term however, Defra considers using, and making available for private use, the gamma interferon blood test as an alternative, and/or an adjunct, to the skin test for pre-movement testing.** An assessment of the costs and benefits would help inform future discussions. One possibility would be to make it available for pre-movement tests in prescribed circumstances e.g. single animals. The Group suggested that the gamma interferon test could be used alone (for example, not as an adjunct to the skin test) for pre-movement testing as this policy is a national control measure and not obviously prescribed by EU rules. The Group was informed by Defra that the gamma interferon test is currently more expensive than the skin test, that laboratory facilities were limited and that there were practical issues to consider in terms of sample handling and transport. Gamma interferon is a more sensitive test and therefore detects infection at an earlier stage. Against this it is less specific than the skin test. On the cost side, as only a single farm visit was necessary, both veterinary and farmer time would be reduced.

Notification of the test status of animals

8. The Group agrees that it is the responsibility of farmers to be aware of the test status of their animals and be in a position to advise their LVI so that cattle are not tested unnecessarily within 60 days of a previous test. The Group is aware that the NFU has been leading an industry initiative to develop a means of identifying test status on the cattle passport, on a self-regulation basis. The industry proposal is for stickers to be made available to farmers via the SVS or LVIs. The Group encourages this practical approach, is pleased that Defra has provided advice on how the cattle passport could be used, and believes there may be a case for further facilitation to help get a

system off the ground. The Group agreed nevertheless that the benefits from such a system would be primarily to industry, and that any scheme could only be a voluntary means of providing information on the test status of an animal. Recognising this, the Group urges livestock owners preparing for a TB test to always check the relevant TB test charts to ensure that only eligible animals are presented.

9. The Group recommends that Defra encourages industry to develop further their proposals for the use of stickers on the cattle passport to identify TB test status, and considers facilitating implementation. Industry needs to do further work to define best practice, and consider how the system would be promulgated, recognising it would not provide a fail safe for buyers or veterinarians.

10. The Group agrees with the conclusions of the DNV report to Defra on veterinary capacity that there were unlikely to be widespread problems in meeting demands for TB testing following introduction of phase II. The Group agrees also that seasonal peaks in cattle movements (particularly in the autumn) mean there is a risk of capacity not meeting demand in areas such as Devon at particular points in the year. Though it was recognised that LVIs delivered the majority of TB tests, it was important that the SVS had capacity to respond in the event of demand being overstretched.

11. The Group recommends that the SVS review their procedures for registering LVIs in order to allow more flexibility and mobility within the veterinary profession to tackle the seasonal pressures on TB testing in particular localities.

12. The Group urge Defra to continue to promote the message that farmers need to speak with their LVIs and plan their TB tests well in advance. **The Group recommends Defra and SVS work closely with the key farming and veterinary organisations to communicate the importance of forward planning for TB tests.**

Costs and responsibilities

13. The Group recognises the costs of pre-movement testing to farmers in 1-2 year tested herds. They own the risk. However, the Group has some concerns about the impact of these costs for the small farmer/livestock owner. This is because the cost of the TB test gets proportionately less the more animals that are tested. Furthermore, the cost of the TB test is higher as a percentage of the value of the animal the younger it is tested.

14. Those receiving tested cattle gain the bulk of the benefits as they will have a reduced risk of introducing TB into their herd. Pre-movement testing will also reduce the risk of spread of TB into wildlife in clean areas. However, some benefits do fall to those subject to the pre-movement testing requirement. They will find infection in their animals earlier than if they had waited for their next routine surveillance test, and early detection of infection reduces the long term costs of controlling bovine TB. Because of the extent of Government funding for TB testing and control (including compensation)

the cost savings from improved disease control fall primarily to the taxpayer. The policy does provide opportunities for those subject to pre-movement testing to reduce the associated costs. The legislation provides for eligible but untested cattle to be sold via an Exempt Market for example, and for the establishment of EFUs which are approved to receive untested cattle that should have been pre-movement tested.

15. Farming organisations have expressed concerns at the small number of EFUs. The Group supported the idea behind EFUs (meeting certain biosecurity standards to reduce the potential risk of disease spread, both to other cattle and wildlife). They agreed that whether or not to seek EFU status is a commercial decision for herd owners, and thought that demand would increase following extension of pre-movement testing to younger animals. On the basis of the information provided by Defra, the Group did not have concerns about the degree of paperwork required in order to apply for EFU status, nor the time taken to gain approval from the SVS. **The Group recommends further publicity to raise awareness of EFUs, particularly amongst buyers in areas where cattle are traditionally taken for finishing.** The review being conducted by the SVS of the practical operation of EFUs should be helpful in identifying any further issues or problems in relation to approval and use of EFUs.

Practical operation of pre-movement testing

Grass keep

16. The application of the pre-movement testing rules in relation to movements to and from grass keep had raised some practical difficulties due to lack of testing facilities. The Group agreed it is the farmers' responsibility to plan ahead and consider the practicalities of pre-movement testing before putting cattle to grass keep. The Group understands that, in the event of testing before return from grass keep being impractical, the Divisional Veterinary Manager (DVM) has discretion to agree alternative testing arrangements, for example post-movement testing. **The Group recommends that the SVS raises awareness of their advice on how to manage the pre-movement testing rules when moving cattle to and from grass keep.**

Animal Welfare

17. The Group is concerned that extension of pre-movement testing to younger animals may increase animal welfare problems on farms. Farms not used to dealing with TB reactors are likely to be affected. When TB reactors are detected, the movement restrictions imposed disrupt business plans and can cause welfare and cash flow problems. Welfare impacts arise from overcrowding, due to insufficient housing, and lack of forage/feedstuffs. Consideration of potential animal welfare issues and having contingency plans for these should be part of good herd health planning within any farm business. Farmers could, for example, consider identifying an EFU or Approved Finishing Unit (AFU) that might take the animals, or changing their farming system to keep the animals through to slaughter.

18. The Group recommends that Defra reviews its advice booklet *Dealing with TB in your herd* to ensure it gives clear advice on roles and responsibilities in the event of welfare issues arising in herds under movement restrictions.

Livestock movement controls

19. The Group recognises that SOAs were established for Foot and Mouth Disease (FMD) control purposes and understands the practical reasons why movements within SOAs are currently exempt from pre-movement testing. Movements between linked holdings however are not exempt from pre-movement testing, although such movements are not reported to British Cattle Movement Service. Both of these elements of the pre-movement testing policy will weaken the disease control benefits and the Group supports implementation by Defra of the *Review of Livestock Movement Controls*, published in July 2006. **The Group recommends that the exemption from pre-movement testing for moves within SOAs should be reviewed as a matter of urgency, in light of the disease risks from these movements.**

Devolved Administrations

20. The Group's remit is to provide advice in relation to England. However, **the Group recommends strongly that there continues to be a co-ordinated approach to pre-movement testing policy in England and Wales.** There would be considerable practical problems in border areas if policy approaches diverge.

Future refinements/best practice

21. The Group agrees that it would be good husbandry practice to isolate pre-movement tested cattle from others until they are taken from the premises. The Group also recognises that those receiving animals into their herds could reduce the risks of TB infection further by post-movement testing. **The Group recommends Defra and industry seek to raise awareness of best practice in terms of disease prevention.**

Future Review

22. The Group have considered the need to review both the practical operation and delivery of pre-movement testing and its epidemiological impacts. The Group agrees that, although the evidence to date is encouraging, more time is needed for there to be clear evidence of the epidemiological impact of the measure. **The Group recommends that practical operation of the pre-movement testing policy is kept under review by Defra and that adjustments are made as necessary to improve effectiveness. However, the Group recommends that a formal review of the impacts of the policy is initiated 2 years after the introduction of pre-movement testing (for example, in March 2008) when more data on impacts will be available.** In the meantime the Group will maintain a watching brief on the effectiveness of the policy and its implementation.

Appendix

The TB Advisory Group has been established to help deliver the aims of the *Government strategic framework for the sustainable control of bovine TB in Great Britain* by:

- *advising on development and implementation of bovine TB control policies in England providing in particular a practical perspective;*
- *working with interested organisations to take account of wider views in developing advice and also to help promote a shared understanding;*
- *responding to requests for advice from Ministers and the CVO, and identifying and advising on issues of concern to interested organisations.*

MEMBERS

Peter Jinman (Chairman)

A senior partner in a veterinary group in Herefordshire for the past five years. Previous positions include: President of the British Veterinary Association, member of TB Core Stakeholder Group and Surveillance Strategy Business Assurance Group and Deputy Chair of SEAC.

Brian Jennings

Suckler beef farmer from west Devon. Previously dairy farmer. Director and Beef Adviser of Mole Valley Farmers Ltd.

Bill Madders

Dairy and arable farmer from Staffordshire since 1960, farming on southern edge of the Derbyshire/Staffordshire TB hotspot.

James Kirkwood

Chief Executive and Scientific Director, Universities Federation for Animal Welfare & Humane Slaughter Association. Deputy Chair, Companion Animal Welfare Council.

Andrew Cunningham

Reader in Wildlife Epidemiology, Institute of Zoology, London. Head of Wildlife Epidemiology, Institute of Zoology, London.