Bovine TB Stakeholder Forum Interim Report – Disease Policy and Working in Partnership
Bovine TB Stakeholder Forum interim report in relation to disease control policy options and working in partnership to eradicate bovine TB by 2030

Contents

Chairman’s Note .......................................................................................................................... 3

A. Policy options to reduce and eradicate disease ..................................................................... 6
   1. Provision of biosecurity advice to farmers: ........................................................................ 6
   2. Integrated breakdown management and communications: .............................................. 6
   3. Blackspot action plans: ................................................................................................... 7
   4. Reducing the risk posed by badgers: .............................................................................. 8
   5. Reducing the risk posed by deer: .................................................................................. 8
   6. Increased focus on herds which require enhanced support due to their disease history:... 9
   7. Risk based categorisation of herds: ................................................................................ 10
   8. Enabling farmers to better understand their own bTB risk: ........................................... 11
   9. Incentivised removal of inconclusives: ......................................................................... 11
  10. Impact: ............................................................................................................................ 12

B. Working in Partnership ......................................................................................................... 13
  1. Mandating the bTB Forum to monitor implementation of the 2030 bTB Strategy:.......... 13
  2. Supporting regional eradication efforts: ......................................................................... 14
  3. Black-spot response: ...................................................................................................... 14
bTB Forum interim report

Chairman’s Note

On May 8th 2018, the Government approved a proposal from the Minister for Agriculture, Food and the Marine, Michael Creed TD to commit to the eradication of Bovine Tuberculosis (bTB) by 2030.

Since 1954, Ireland has culled around 2.5 million bTB reactor animals in our efforts to eradicate bTB. In that time, significant costs have been incurred by farmers, the State and the EU. Trends in expenditure and disease levels have varied over the past 64 years but if the 2017 estimated expenditure levels of €84m are used as a guide, this would equate to total programme expenditure of €5.5bn in today’s monetary terms since 1954. If the ambition to eradicate bTB by 2030 is achieved, by this time another €1 billion will have been spent if current trends continue. Achieving eradication by 2030 will mean that real and substantial savings will accrue to the industry and the State after that. This should provide a strong financial incentive to all stakeholders in driving policies that can achieve eradication by 2030.

Similar to the economy as a whole, the health of Ireland’s agri-food sector is determined by its ability to trade internationally. Engagement with 3rd countries is on-going in advance of Brexit in an effort to diversify trading options for Ireland’s agri-food sector. Increasingly, animal health issues are forming part of Ireland’s bilateral trade agreements, including requirements specific to bTB which are additional to the controls in place under EU law. An enhanced 2030 Eradication Strategy will provide further assurance to prospective trading partners that Ireland is firmly committed to the quality of its produce and exports.

In recent years, research confirmed that Ireland’s badger population was a significant factor influencing bTB prevalence in bovines. This issue is now being actively addressed while respecting the badger’s protected status under the Berne Convention. Following this, and other developments in the areas of diagnostics, quality control, identification/traceability, it is considered that all relevant policy tools are available to stakeholders to achieve bTB eradication by 2030.

Part of the Government’s enhanced commitment to eradicate bTB by 2030 involves the establishment of a bTB Stakeholder Forum tasked with proposing policies to help achieve eradication within this timeframe. Establishing a Stakeholder Forum is in line with the four main principles outlined in the National Farmed Animal Health Strategy launched by Minister Creed in 2017. The four principles are:

1. We must work together to improve animal health standards.
2. The roles and responsibilities of all stakeholders must be clear.
3. The principle of ‘prevention is better than cure’ must be consistently applied
4. Finally, animal health programmes will have clear objectives, and will be sustainably and appropriately funded.

Reflecting these principles, the Forum’s deliberations were informed by three consultation papers which highlighted some of the key areas that can assist in achieving eradication. These papers focused on:

1. Working in Partnership;
2. Additional Policy Measures;
3. Cost and Benefits.

The Forum comprises of representatives from across the agri-food sector, leading researchers and the Department of Agriculture, Food and the Marine.

I was delighted to be asked to chair this Forum.

To date 7 meetings of the Forum have taken place covering policy options for eradication by 2030, working in partnership going forward and costs and benefits.

A number of bilaterals in relation to the current programme were also held.

This preliminary report on disease and governance policy will be followed by a report on costs and benefits which is deferred pending the completion of a 3rd party review of this element of the programme.

There has been broad agreement on governance and most policy options with the exception of public use of herd categorisation for the purpose of risk based trading and whether existing compensation rates should be amended.

On costs and benefits there was broad agreement that there should be a defined envelope of costs and each sectors share of same but there was no agreement on what those costs should be or what the share should be.

A 3rd party review of the On-Farm Market Valuation process will be carried out based on terms of reference agreed with the Farm Organisations. The OFMV Scheme provides values for cattle removed as reactors.

A recalibration of the current supplementary compensation schemes, i.e., Income Supplement, has been sought with a view to better targeting of payments to farmers who need it most when it is most needed. The Department will carry out an assessment into this matter.
Summary

Following detailed discussions informed by available scientific evidence and stakeholder perspectives, the Forum reached agreement on recommending a selection of policy options which should have a significant impact on the reduction of bTB in the years ahead. The industry need to continue to work towards bringing in additional policy measures that will eradicate TB in a short time frame with 2030 as the continuing target.

I want to thank all the members of the Forum for their constructive engagement with this process, for willingly giving of their time attending the meetings, and for considering and debating all the proposals. I also want to thank all the stakeholders who tendered submissions to the group for consideration.

I would also like to thank the members of DAFM staff who acted as Secretariat to the Forum and whom we had direct contact with throughout this part of the deliberations.

Michael Cronin
Chairman, bTB Stakeholder Forum
**A. Policy options to reduce and eradicate disease**

I. This section sets out the disease control policies which the TB Forum agreed should be recommended to the Minister. A number of additional disease control policies were considered and debated, but the Forum as a whole was unable to reach agreement at this time on recommending these additional policies.

1. **Provision of biosecurity advice to farmers:**

   I. Biosecurity advice on how to reduce the risk to cattle of bTB should be provided to farmers in a range of ways, including leaflets, websites, videos, etc. This would enable farmers to make informed choices on how to keep their herd clear of bTB. This should include detailed biosecurity advice to assist farmers in reducing the potential risk posed by introduced cattle, contact between cattle and potentially bTB-infected wildlife, and would highlight the importance of good disinfection. The advice would also support other policy measures by increasing the underlying level of knowledge on TB. Farmers should be given incentives to implement biosecurity actions.

   II. **Degree of impact on the eradication of bTB by 2030:** Moderate. The provision of advice in itself is unlikely to change behaviour sufficiently to significantly reduce the level of TB unless the behavioural changes are linked to incentives. Farmers who are already interested in protecting their cattle would be able to do so more effectively.

2. **Integrated breakdown management and communications:**

   I. DAFM should put in place a single point of contact for herdowners affected by bTB breakdowns, with the aim of reducing the stress and uncertainty which farmers endure, particularly in the early days of a restriction. The contact point would be a person in the regional DAFM structure who could advise farmers on the process, their options, the steps involved, and who would be able to receive queries and comments. The contact point would then have the role of following up with the relevant DAFM staff (for example, this might be the veterinary inspector for a disease query or an administrative officer for a query relating to payments) and ensuring that the information got back to the farmer in a timely and clear manner.

   II. **Degree of impact on the eradication of bTB by 2030:** Minor in the context of disease, but very important nevertheless due to the potential impact on reducing farmer stress. Recognising the stress caused to farmers during bTB breakdowns, and in particular the stress
caused by uncertainty surrounding the process at the start of a breakdown, is critical and this proposal will contribute towards reducing some of that stress.

3. Blackspot action plans:

I. There are some areas where bTB breakdowns occur in a clustered pattern in a localised area. Where a significantly higher level of bTB is occurring in a particular area, a blackspot action plan should be put in place. Bovine TB blackspots are not necessarily confined within county or regional office boundaries, or within the administrative boundaries of district electoral divisions (DEDs). Where blackspots occur, management of these should be based on the area affected in order to ensure consistency of approach, maximise effectiveness and immediate access to all relevant material for those affected.

II. The blackspot action plan should involve, as a minimum:

(a) A methodology to identify blackspots based on disease levels and spatial clustering.

(b) Detailed and thorough investigations of the drivers of the increase in disease and of all bTB breakdowns in the area.

(c) In managing blackspot action plans, Department officials together with stakeholders will consider the appropriate measures to assist herdowners in eradicating disease from their herd and preventing further spread to additional herds. For example, some of the measures used in managing the Cavan/Monaghan blackspot area in 2018-19 include:

• Providing biosecurity advice to herdowners
• Convening public meetings to explain proposed measures
• Additional DAFM staff resources to assist with enhanced testing and wildlife programme
• More targeted use of Gamma interferon blood testing
• More frequent testing of at-risk/contiguous herds
• Sending leaflets/newsletters to herdowners informing them of developing situation and providing advice

III. It should be noted that this disease policy proposal also links to the proposal made during the Working in Partnership meetings of the bTB Forum where it was agreed that local meetings should occur between DAFM and stakeholders, particularly in the context of blackspot management.

IV. Degree of impact on the eradication of bTB by 2030: Moderate. It is important to take additional, effective measures to address localised increases in bTB. These actions must help affected herds to get clear and stay clear, while also protecting neighbouring herds and preventing the local spread of bTB, and preventing the wider dissemination of disease in the national herd.
4. **Reducing the risk posed by badgers:**

I. Since January 2018, DAFM policy has been to reduce the risk of bTB posed to cattle by badgers by carrying out culling in areas where badgers are linked to a TB breakdown and vaccination of badgers in other areas. The evolution of this policy continues to be informed by ongoing research, including the impact (if any) of tree felling and construction projects on wildlife perturbation, and the local factors affecting bTB risk and wildlife risk mitigation. The Forum recommends that DAFM continues and enhances its focus on the risk posed by badgers, with sufficient resources committed to the wildlife programme to optimise its implementation. The forum further recommends that DAFM expedite the investigation into the Monaghan/Cavan blackspot area and consider implementing a pen side TB test for badgers if it passes DAFMs field testing phase.

II. **Degree of impact on the eradication of bTB by 2030:** Significant. Research carried out by CVERA has demonstrated that this policy can reduce the level of transmission of TB from badgers to cattle sufficiently to enable a focus on reducing cattle-to-cattle transmission to have a real impact.

5. **Reducing the risk posed by deer:**

I. A policy of reducing deer density throughout the country, combined with a deer population reduction programme near bTB outbreaks has been proposed. Deer should not be allowed to become a maintenance host for TB. DAFM will communicate to farmers the methods by which they can reduce the potential risk posed by deer to their herds. DAFM will also engage with Coillte regarding deer on Coillte lands.

II. The current situation is that farmers are already empowered to cull deer on their land, or to get deer hunters to do this for them. The NPWS has confirmed that poaching of grass constitutes crop damage and thus is grounds for granting a section 42 licence to cull out of season. Farmers need to be made aware that they can apply for such a license. Under the National Deer Management Strategy (developed by farming organisations, Coillte, NPWS, DAFM and others), lead responsibility for deer management lies with the landowner. In Wicklow, where there are high numbers of deer and high levels of bTB, a local steering group to enable farmers to coordinate and organise culling of deer has been established in Calary, supported by DAFM and NPWS, and involving the IFA and Coillte, thereby achieving a farmer-led deer population reduction programme in areas with both high bTB and high wild deer populations. Three further local deer management groups have been established in other parts of Wicklow, supported by DAFM, to enable farmers to manage deer on their land in a coordinated manner.

III. Within Wicklow, research carried out by DAFM has found the same strains of M. bovis circulating in cattle, badgers and deer in the Calary area. A study in 2016 found a bTB prevalence of 16% in deer in Calary; a follow up study using slightly different methodology
(so not directly comparable) has found interim results of 8.3% (10/121) in deer shot on farmland and 0% (0/32) in deer shot in a control area in the national park in Djouce (the final study results will not be available until later in 2019). Outside Wicklow, 73 wild deer were tested for bTB in Regional Veterinary Laboratories in 2017 and 2018; three were positive for bTB.

IV. Degree of impact on the eradication of bTB by 2030: Limited. Since there is no evidence that deer play a significant role in propagating bTB in cattle in most of the country, it follows that culling deer in those areas is unlikely to influence cattle TB levels. In Wicklow, deer, badgers and cattle share the same strain of bTB and local programmes are already in place to enable farmers to organise the culling of deer and thereby mitigate any risk. Where deer are implicated in the transmission of bTB to cattle, reducing deer density is likely to mitigate that risk, which is why local programmes in Wicklow are already in place to enable farmers to do this.

6. Increased focus on herds which require enhanced support due to their disease history:

I. Herds which are currently not restricted but which have a chronic history of severe bTB or which have a pattern of repeated breakdowns are at a much higher risk of future breakdowns. By intervening with enhanced support to reduce disease risk more effectively in these herds, it would be possible to better protect them. This will help by reducing their risk of future breakdowns and reducing the severity of any breakdown which did occur, while also increasing the protection delivered to neighbouring herds, herds which might trade with these chronic herds, and the 97% of herds which are bTB free. This would also reduce the risk posed to restricted herds which are seeking to regain their bTB-free status but which may be put at risk by unrestricted chronic high risk herds.

II. These herds, which may be termed “enhanced support herds”, will be defined by a combination of the number of reactors which they have had in recent episodes, the number of recent episodes of TB, and the length of recent breakdown episodes. The exact criteria are to be defined by DAFM based on research on the future risk of breakdown predicted by a combination of these three elements (number of reactors, number of episodes, length of episodes). It is anticipated that the number of herds which will be in the enhanced support category will be of the order of 300-500.

III. There are three key elements to this proposal:

(a) Enhanced support herds should each get a tailored bTB risk management plan, developed by a veterinarian familiar with the herd and the local context. The herd owner would be expected to take action based on the recommendations in the plan. The plan should address routes through which cattle in the herd are likely to acquire infection, ways to manage and confine within-herd spread, biosecurity arrangements to reduce the risk of introduction of
disease, and any other factors relevant to the herd. This plan should be revised annually while the herd retains its “enhanced support” status. Farmers should be incentivised to adhere to a risk management plan. Where there is a chronic on-going problem and where advice has been given and followed, depopulation should be considered where other measures have failed to eradicate the disease.

(b) Cattle moving from an enhanced support herd should have a pre-movement bTB test carried out within the 60 days preceding the movement. This would mitigate the risk of bTB spread to the 97% of free herds via undetected infection in cattle originating from chronic herds. Regular whole-herd tests would count as pre-movement tests if carried out within 60 days of the movement. The type of bTB test used (skin or blood test) could be decided as appropriate to the situation. The requirement to pre-movement test should form part of the risk management plan. DAFM will pay for pre-movement tests up to four times a year for these herds as required.

(c) Enhanced testing of enhanced support herds to identify and remove infected cattle. When herds with a chronic bTB history do experience a breakdown and are restricted, an enhanced testing programme is required which should be tailored to the risks in the herd, in addition to the statutory minimum testing. A detailed and thorough investigation of such breakdowns must be carried out to identify and remove all sources of the disease in the herd. Animals deemed higher risk in these breakdowns should be removed, and intensive investigation, testing and disinfection carried out. All measures necessary to remove the disease from the farm must be implemented before derestriction. Any proposed measures must be supported by scientific research.

IV. **Degree of impact on the eradication of bTB by 2030:** Significant. The failure to effectively support chronic herds in clearing the disease and staying clear has contributed to the persistence of bTB. Addressing this risk effectively will make a significant difference in preventing these herds from spreading disease, and will enable the chronic herds to reduce their risk of recurrence of bTB, supporting them in the long term sustainability of their business.

7. **Risk based categorisation of herds:**

I. Herds do not all have the same future risk of a bTB breakdown. The vast majority of herds are at a very low risk of bTB infection; a smaller number are at quite a low risk; a smaller number again are at a higher risk; and a very small number are at a relatively high risk of experiencing a bTB breakdown in the near future.

II. DAFM already has a system for allocating herds to a risk status based on their bTB history. This system, whereby herds are designated as default risk, low risk, or high risk, is used for DAFM case management and to automate herd test rules. Herd owners are informed of this risk by printing their bTB risk code on all bTB-related letters; for example FD0 means “Free of bTB, default risk, no reactors are the last bTB test”; FH0 means “Free of TB, high risk, no
reactors at the last bTB test”. However, these risk categories are not intuitive or easy to understand, and are not well suited to clear communication. DAFM is currently planning to update the coding to make it more intuitive to users.

III. The proposal discussed at the bTB Forum was to develop revised risk categories which are simple, clear, and convey sufficient information to enable farmers to make the decisions appropriate to their situation. Three options were discussed. The preferred option, subject to further consideration of the final details, is outlined below:

Calendar years combined with qualitative assessment of risk: This status combines a number (1-10) indicating the number of years since the herd was last bTB restricted, capped at 10—thus a herd that has been clear for three years would be designated as C3; a herd that has been clear for 10 years or more would be designated as C10. This option has the benefit of providing an objective assessment of the length of bTB freedom.

IV. Degree of impact on the eradication of bTB by 2030: This would be an important and necessary support to other policies; without an effective risk categorisation system, risk-based bTB controls cannot be implemented as effectively.

8. Enabling farmers to better understand their own bTB risk:

I. Enabling farmers to know their own bTB risk and to understand what that means and how they can make decisions based on that would be a critical part of supporting farmers. The mechanism for this could be printing the risk category on bTB-related correspondence (as is currently done using the present risk category system), combined with a website enabling farmers to look up their own risk. Medium-term plans to expand the utility of the AgFood portal for farmers could be one way to achieve this.

II. When farmers have a breakdown, the notification sent to them by DAFM (i.e. the “reactor pack”) could be amended to include a summary of their bTB history and of inward movements into their herd in the previous five years. It is already the case that farmers are entitled to know information relating to their herd under GDPR rules.

III. Degree of impact on the eradication of bTB by 2030: This would be a critical part of enabling farmers to make decisions to manage their own bTB risk.

9. Incentivised removal of inconclusives:

(a) Cattle which have in the past tested inconclusive and re-tested negative are at a much higher risk of developing bTB and spreading the disease to other cattle while they remain in the herd of disclosure. In some cases these animals are retained for years, only to then cause a severe breakdown. Farmers should be made aware of the risks associated with inconclusive animals and strongly advised to voluntarily slaughter these animals. In order to
eliminate inconclusives that could potentially be infected, DAFM will blood test all inconclusives that pass a skin re-test, and then blood test them again at regular intervals if still retained in the herd.

I. **Degree of impact on the eradication of bTB by 2030**: Moderate. The removal of inconclusives would close off the risk posed to that herd of the inconclusive actually being infected and spreading disease to other cattle in the herd prior to detection. Epidemiological assessments of some large TB breakdowns in herds link the breakdown to the presence of an inconclusive from a previous test. Removal of inconclusives will reduce residual within-herd spread.

10. **Impact**:

I. There is general consensus at the bTB Forum that the current bTB eradication programme is not sufficient to eradicate bTB by 2030, nor even to reduce bTB levels significantly below the current levels of around 3.5% herd incidence annually. This is supported by the available research and the disease trends of recent years, which show that although bTB levels in the past four years are lower than they have ever been, progress has stalled.

II. It follows from this that, if the goal of bTB eradication by 2030 is to be achieved, substantially more effective policies are needed, in addition to the existing policies.

III. The bTb forum has worked constructively to reach agreement on recommending a selection of policy options which will enhance and improve the current Tb programme. These new policy options are likely to lead to a reduction in Tb over a period of years. They also provide a very useful platform on which to build and potentially agree further measures in due course, as the newly recommended measures bed in and their impact is measured and reviewed.
B. Working in Partnership

The importance of shared ownership of animal health programmes has been recognised in the National Farmed Animal Health Strategy and outlines that the principle ‘working in partnership’ should be a central tenet in any animal health initiative.

Establishing a bTB Stakeholder Forum was the first step in seeking to further develop the role stakeholders play in attempting to eradicate bTB. Through the Forum, stakeholder views are sought in developing policy proposals which will feed into the 2030 bTB Eradication Strategy. That process has been approved by Government.

The consultation paper in advance of the TB Forum outlined a number of options that would facilitate greater stakeholder involvement in overseeing implementation of the TB Eradication Programme. Following discussion at the Forum, there is unanimous support for significantly enhanced stakeholder engagement in TB Eradication.

The Forum recommendations related to enhancing ‘Working in Partnership’ are:

1. Mandating the bTB Forum to monitor implementation of the 2030 bTB Strategy:

   I. Once the Forum finalises its work and provides its policy proposals to the Minister for Agriculture, Food and the Marine, the Forum (which comprises members from farming representative bodies, meat and dairy industry, farming and research communities, veterinary profession and DAFM officials) will be tasked with monitoring implementation of the revised 2030 bTB Strategy and when deemed appropriate proposing further policies that are consistent with achieving eradication.

   II. It is envisaged that the bTB Forum Implementation Body will meet twice a year, end Q1 and end Q3 and work to a set agenda as follows:

      (a) Update on disease trends and review of progress.

      (b) Update on expenditure and financing of the Programme.

      (c) Monitoring Implementation of bTB 2030 Strategy.

      (d) Policy/Operations Suggestions – option open to all to input prior to meeting. If passed by meeting then proposals are formally submitted to the Minister for consideration.
2. Supporting regional eradication efforts:
   I. Achieving eradication will require consistent, country-wide efforts. Recent stakeholder consultation has demonstrated that there are many misconceptions related to some of the policies related to the bTB Programme. Currently, Regional Veterinary Offices (RVOs) are proactive in engaging with farmers and the veterinary profession in managing breakdowns. It is proposed that each RVO host an annual open stakeholder meeting to review bTB trends in the region. This could include items such as an epidemiological overview of the main contributory factors to bTB outbreaks in the region and how farmers can reduce their herd’s risk of contracting bTB.

   II. The Regional Stakeholder meetings will be held annually and led by RVO Staff and Area Management Teams (AMTs). Invitees to include Farmers, Farming Reps, Private Veterinary Practitioners, RVO and DAFM HQ Staff. The Forum is to be kept appraised of the dates of these meetings.

   III. The Agenda for all Regional Stakeholder meetings will be as follows:
       (a) Overview of National Disease Trends
       (b) Focus on the Region – Disease Trends
       (c) Upcoming changes – policy/legislative/administrative
       (d) General Information Presentations e.g. biosecurity, epidemiology, new policy changes e.g. Gamma testing, badger vaccination
       (e) Q&A

3. Black-spot response:
   I. On occasion, a severe bTB outbreak can affect a discrete geographical area leading to financial and mental stress for the effected farming community. In these circumstances, it is imperative that all stakeholders are clear on the proposed course of action to find, confine and eradicate the disease from that area. It is proposed that in such cases, RVOs will convene a meeting of local farming representatives and Private Veterinary Practitioners to provide an overview of the actions all stakeholders can take to mitigate the spread of the disease. It will also focus on biosecurity measures the farming community can take to mitigate their herds’ risks of contracting the disease or alternatively ensuring their herd becomes clear again as quickly as possible. Black-spot responses may also be supplemented by public meetings to inform local herdowners of developments.

   II. As required, and once a bTB Control Plan has been formulated, RVOs will convene a meeting of local stakeholders to communicate the proposed course of action to confine and eradicate the disease from that area. The aim is to keep stakeholders informed and
equipped to assist in eradication and to ensure that herds affected are assisted in every way to become clear of disease.

III. It is envisaged that Blackspot Control Plans will be formulated in consultation with local stakeholders. The Control Plan will address issues such as:

(a) Enhanced policy measures
(b) Cleansing and Disinfection
(c) Communications
(d) Wildlife
(e) Working in Partnership