1. The Association of Veterinary Surgeons Practising in Northern Ireland (AVSPNI) represents almost 300 veterinary surgeons engaged in clinical practice in Northern Ireland.

2. The North of Ireland Veterinary Association (NIVA) is the representative body for the entire veterinary profession in Northern Ireland and the local division of the BVA, which represents 12,500 veterinary surgeons across the UK.

3. The primary aim of a veterinary surgeon is animal health and welfare; no single element of this has more impact than disease eradication. Veterinary surgeons in Northern Ireland, both in practice and within the Department and AFBI, are committed to playing their part in driving forward the eradication of bovine TB.

4. NIVA and AVSPNI would like to thank the ARD Committee for the opportunity to submit evidence to their Review on Bovine Tuberculosis (bTB). We note that the focus of the Committee’s review will be on the preventative measures which should be taken in order to reduce the risk of infection. Our submission therefore concentrates on three main areas, biosecurity and cattle movements, wildlife, and bTB testing where we feel that measures could be improved upon or put in place to assist in reducing the risk of infection.

Biosecurity / Movements

5. Commercial livestock producers and governments are primarily inclined to view the health of their livestock as a means to an end, as much an end in itself. As a result, most farmers and governments apply only sufficient biosecurity\(^1\) to maintain the level of herd health necessary for the productivity and freedom to trade which their business model demands.

6. We believe that there is potential for the degree of biosecurity in the cattle sector in Northern Ireland to be greatly improved, and thus the incidence of bTB reduced. However, we acknowledge that this will require a significant expenditure of effort and resources, and note that at present the cattle sector lacks the necessary economic drivers to change cattle farming and business practices.

7. After more than sixty years of testing cattle for bTB, many of those involved in cattle farming now consider bTB as "just a fact of life", albeit an unpleasant one, rather than a disease that they could and should be actively preventing. In order to ensure that Northern Ireland can move towards bTB eradication we believe that it is necessary to re-kindle the cattle industry’s enthusiasm for herd health, and to provide tangible economic drivers for change.

8. One such driver could be the creation of a Northern Ireland wide cattle health programme for Bovine Viral Diarrhoea (BVD), Johne’s disease and Infectious Bovine Rhinotracheatitis (IBR) eradication. We believe that there is real enthusiasm for such a scheme among many cattle farmers and feel that the Scheme would be ideal to engender renewed enthusiasm for herd health.

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\(^1\) The prevention of disease causing agents entering or leaving any place where farm animals are present (or have been present recently).
9. A key element of the programme would be a formal commitment to specific biosecurity practices, which would in time become mandatory for all Northern Ireland cattle producers. Biosecurity measures might include:
   a. Integrating production (birth to beef or purchasing direct from known sources rather than open livestock markets);
   b. Insisting on pre and post movement testing of purchases;
   c. Quarantining of purchases;
   d. Avoiding showing livestock;
   e. Restricting use of outlying farms and unfenced land to crops or conservation;
   f. Fencing off high risk areas (badger setts, deer forests);
   g. Preventing wildlife access to feed-stores;
   h. Controlling visitor access to farm premises, land etc.

10. The local veterinary profession is ideally placed to provide advice and guidance to individual farmers on how best to apply these measures to their individual livestock enterprise.

11. A cattle health programme encompassing enhanced biosecurity measures would improve cattle health as a whole and therefore also have a positive impact on bTB. Such improvements would be particularly timely, as many of the other industry elements that impact on biosecurity are also currently positive. NI has the best cattle tracing system in the world; economic indicators are positive in the cattle sector; cattle movements are now lower than those in GB; livestock are spending more of their lives indoors, due to changes in beef production and marketing, and in dairy nutrition and milking practices; and there is increasing market sensitivity to animal health and welfare, and to potential human health issues such as Johne’s / Crohn’s Disease.

12. The government also has much to gain given the potential risk to our trade with Europe, Scotland and the Republic if levels of bTB and other diseases are not sharply reduced. bTB remains a significant economic issue at national level with ~ 8100 cattle being culled early, and the bTB programme costing an even higher percentage of the agriculture industry’s total annual value.

Wildlife / Research

13. NIVA and AVSPNI are clear that wildlife (primarily badgers) contribute significantly to the levels of bTB in our local cattle population, and that any attempt to eradicate the disease from cattle without simultaneously dealing with the reservoir of infection in the local wildlife population is unlikely to succeed.

14. That said, any strategy for the control of the spread of bTB from wildlife to cattle must be based on valid scientific knowledge, and there remain a number of research gaps. Research is needed into the factors that drive badger / cattle spread so that biosecurity strategies can be made more effective. In addition, the amount and spatial extent of contact from infected badgers in the Northern Irish ecosystem and farming business model needs to be examined so that the impact of a range of local or wider cull or vaccination strategies can be assessed.

15. Applied research is also urgently needed into the effectiveness of a composite catch / cull / vaccinate / test (to differentiate infected / vaccinated badgers) strategy in the local physical and social environment, so that such a strategy can be sustainable and defensible in the long-term, and yield results in the badger and cattle population that are of clear and lasting benefit.

16. NI should also participate in development and trialling of an oral badger vaccine at the earliest opportunity, bearing in mind the likely time-frame of such a programme, it is essential that an active engagement in this is made as soon as possible.
17. These strategies would also be very beneficial in addressing the health and welfare of the badger population which is currently significantly compromised by the levels of bTB it experiences.

18. We are concerned that only limited resources appear to be being committed to the problem of bTB in farmed and wild deer. While we recognise that deer are de minimis as a reservoir, compared to badgers, in the fullness of time this too must receive attention.

19. Finally we note the success with which the New Zealand cattle industry has addressed its bTB problem despite a similar wildlife reservoir (possums) with less than 100 herds presently affected.

20. We suggest there would be considerable merit in a study visit to New Zealand of interested parties; government and private vets, farmers, processors, wildlife experts to learn from their experience.

21. Finally, while the Associations agree it is important not just to do something “for the sake of doing something”, or “to be seen to be doing something”, we consider there would be significant merit in the Department engaging in an early “Catch / Test / Cull” trials as part of a local disease control initiative or a wider biosecurity / Herd Health Scheme. Apart from any intrinsic benefit, this would go a long way to help counter the perception among farmers that “there is nothing we can do / what is the point of trying” that is currently the common justification for failing to apply other simple biosecurity measures or changes to high-risk business practices.

**bTB Testing**

22. In Northern Ireland the overall standard of bTB testing is without doubt the highest and the most intensively controlled and audited, in the British Isles and Europe. However it is a source of real concern to the profession that for those currently entering the profession in 2012, so little has changed from the time of James Herriot, when he started bTB testing in 1942.

23. Nonetheless, while the veterinary profession would welcome the opportunity to move on from the successful control of this disease to others such as BVD, Johne’s etc., NIVA and AVSPNI members remain committed to the detection and removal of infected cattle from our clients’ and the country’s herds.

24. In the meantime the profession strongly believes that the presence of a vet on each cattle farm at least once a year is a significant contribution to general animal health, animal welfare and disease surveillance. In this respect, vets in private veterinary practices would particularly welcome the opportunity to become more involved with farmers in developing strategies to reduce the risk of infection entering their premises (for example through the Cattle Health Programme described above); and to expediting its removal if found.

25. NIVA and AVSPNI have approached government with offers to take on other work such as Brucellosis sampling and thereby avail of efficiencies of scale for both parties; and increased synchronisation of tests on farm, and were disappointed when this proposal was not taken up.

26. NIVA and AVSPNI recognise the important contribution of the farming industry in complying with the requirement to muster cattle for testing, both in terms of the opportunity cost around the farmer’s labour and time, and the loss in livestock thrive and milk production, and through injury.
27. NIVA and AVSPNI have noted the Public Accounts Committee’s suggestion that DARD investigate Lay Testing and DARD’s subsequent pilot. While we await DARD’s analysis of the recent Lay Testing pilot with interest, we believe the premise underlying the PACs suggestion to be flawed.

28. At first sight lay staff ought to be less costly than qualified veterinarians, but the presence of vets on the farm and in the rural community offers much more than just a facility to inject tuberculin. Any move by DARD to employ lay testers at the expense of veterinary practices could bring many marginal disadvantages in the areas mentioned above e.g. on farm health and welfare surveillance, the close relationship with and knowledge of client’s livestock and farms. It is also directly at odds with the Executive’s strategy of enhancing the capacity of the public sector and the capability of Northern Ireland’s small businesses and of promoting export-led growth from the agri-food sector, as “lay tested” animals may not be eligible for European trade.

29. If forced down this road, however, some practices might be prepared to employ lay testers, especially if they were able to do other work e.g. sample for the Brucellosis scheme too. But as Associations we consider that even this would be a less than helpful development, as it would lead to the reduction in numbers of qualified vets in the food animal practices, and so could have significant negative effects on the veterinary services available to livestock producers in small villages and remote rural areas, including those that DARD would wish to call upon in the event of epizootic disease like Foot & Mouth Disease.

30. Similar risks could attend the adoption of a serological test for bTB. However the Associations are hopeful that by the time such a test has been developed to a standard where it can be used as a routine tool for diagnosis of bTB, the focus of practice and the industry and Department will have moved on to the other cattle health programme recommended above, enabling the resulting benefits of such a test to farmers to be realised without jeopardising the benefits currently provided to the wider industry and rural community as a consequence of the present technology and delivery arrangements.

31. We believe that more clarity is needed around the understanding of the term “no visible lesions” and the way that this term is used in communications with farmers, many of whom believe that this means “no disease present”. This miscommunication is propagated in the case of a herd with just one reactor that shows no lesions; APHIS categorises this as “TB not confirmed”. We would prefer to class such animals as “Early stage infection” and feel that some education of the wider agricultural industry is needed to increase its understanding of the true nature of the disease.

32. As part of its on-going commitment to TB eradication, AVSPNI held a TB Forum on 1st February, 2012 at which over 120 vets heard speakers of the highest calibre on topics including the progress being made in the TB programme in the Republic of Ireland and the impact of wildlife controls of levels of TB; an update on the epidemiology of bovine TB and the interaction of cattle movements, local disease levels and wildlife factors on the incidence levels; the practicalities and implications of wildlife and cattle vaccine developments; alternative tests for bTB and their advantages and disadvantages; and the role of concurrent diseases such as Johnes disease and liver fluke infection in the detection and spread of TB. As a profession, we cannot stress enough our commitment to see this disease eradicated.