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FROM THE PRESIDENT

Stella McCardle
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Dear Stella

ULSTER FARMERS' UNION'S (UFU) SUBMISSION OF WRITTEN EVIDENCE TO THE COMMITTEE FOR AGRICULTURE AND RURAL DEVELOPMENT REGARDING THE REVIEW OF BOVINE TUBERCULOSIS.

Thank you for your letter of 27th March seeking the UFU's views on the above subject. The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland representing over 11,000 farming families and as such would like to make the following comments;

Introduction

In 1949, Northern Ireland (NI) introduced the Tuberculosis (Attested Herds) Scheme designed to encourage the establishment in NI of cattle herds certified as officially free of bovine TB. Compulsory testing of TB was introduced in 1959 and in the decades since has fluctuated between annual, biennial and triennial testing depending on disease levels. However since 1983 NI has been on annual testing entirely. For 63 years farmers have been dealing with the burden of TB and in this time there has never been a sufficiently robust policy to eradicate the disease.

The UFU recognise that there are a range of factors that contribute to the control and eradication of TB. Unfortunately the policy to date has concentrated on cattle control measures. The UFU believe that the current policy will not deliver in terms of eradicating TB but will instead only prolong the burden that TB imposes on the farming community. Cattle control measures, biosecurity and rigorous testing procedures will never eradicate the disease unless all sources of the disease are addressed. The remainder of this document outlines the current control programme, the impact that TB has on farmers and the additional measures that must be prioritised immediately in order to create a more robust TB eradication programme.

The key elements of the existing Northern Ireland TB Control Programme

The programme consists of the following elements

- TB testing of all herds in Northern Ireland on an annual basis;
- Valuation, removal and slaughter of reactor and in-contact animals;
- Abattoir surveillance, of all cattle carcasses, for the presence of tuberculosis lesions;

- Increased frequency of TB testing for individual animals and herds where there is considered to be an increased risk of disease e.g lateral risk testing;
- Severe interpretation of the tuberculin test in some cases;
- Post mortem examination, including histology and/or bacteriology, to confirm disease;
- Movement restrictions on herds and/or animals where the presence of disease is suspected or established, until disease free status is re-established;
- Forward and backward tracing of animals from breakdown herds and associated risk testing;
- Investigation of confirmed breakdown herds by a Veterinary Officer;
- Establishment and maintenance of a real time computerised animal identification and movement recording system; and
- Financial compensation to the owners of reactor or in-contact animals.

Impact on the Farming Community

The Northern Ireland Agri-Food Better Regulation and Simplification Review produced in April 2009 estimated (based on 2007 incidence) the administrative cost of TB to be £8.23 million per annum.

There is also a significant impact on farmers health and well being. Having to deal with the pressures of TB restrictions and constant herd breakdowns can be detrimental to the mental health of farmers.

Measures that should be taken to Reduce and Eradicate TB

Against this background, the UFU priority remains the same as it has done for the past number of years, to see meaningful action taken to address the disease in wildlife. Based on the previous DARD Minister's (Michelle Gildernew) three stranded approach to eradicating bovine TB it must be recognised that farmers have fully embraced the first two strands which were: 1) real partnership between government and industry and 2) controlling the spread of TB between cattle. The third strand, addressing the wildlife factor, remains undelivered. To address this the UFU believe that DARD should take the following actions.

- a. DARD should recognise that tackling the reservoir of TB disease in wildlife is an essential part of an effective TB disease eradication programme.
- b. Both the Minister and DARD should commit to developing a Wildlife Intervention Programme, which will include time based milestones by which a series of agreed actions will have been carried out.
- c. DARD should establish a Group to operate with the sole aim of working up the elements, both practical and conceptual, which would form the basis under which a robust, effective and defensible, Wildlife Intervention Programme, would be delivered.
- d. DARD Veterinary Service should commit to identifying a series of "hot spot" or "recent outbreak" locations where focussed actions and research could be carried out with a view to further informing the already existing science and supporting the planned Wildlife Intervention Programme.
- e. Whilst the UFU recognise that while it may remain an aspiration of DARD to reduce TB compensation levels, no such reduction will be implemented by the Department until an agreed Wildlife Intervention Programme is operational in rural areas.

UFU Comments on the Remaining Aspects of TB Control and Eradication

Bio-security measures: Biosecurity undoubtedly plays an important role in controlling the spread of TB. Biosecurity measures should be incentivised at farm level as adopting biosecurity measures to prevent cattle to cattle spread and the incursion of wildlife can be very difficult and extremely costly.

Vaccination: The UFU recognises that vaccination is likely to have a very important role to play in the control of TB however there are very real problems with the availability of vaccine for cattle and badgers. Cattle vaccine production has consistently been delayed and even if it is developed, deployment will be delayed due to EU regulation. Oral badger vaccine will not be available until at least 2015 and therefore the only current vaccination option is an injectable badger vaccine. The process of injecting badgers has practical difficulties and is therefore a costly option however the injectable vaccine could have an important role in reducing the effects of perturbation in the future.

Dealing with TB in Wildlife: This is the key priority for the UFU. TB will never be eradicated if the disease is not dealt with in wildlife. Farmers are extremely frustrated that there has been no meaningful action to tackle the disease in wildlife to date. The UFU would like to see action taken by DARD as outlined above. It is important to note that the Republic of Ireland operate a badger intervention policy where badgers are identified as a probable cause in breakdown herds.

Testing: The tuberculin test is not perfect. However, according to DARD it is the best test currently available. It can be expected to detect approximately 75% of infected cattle at any one test. Herds in which reactors are found are tested a number of times in order to give the best chance of eliminating infection from the herd. It is further known that when the test is used on cattle without disease, it wrongly classifies a non-infected animal as diseased less than once in 1,000 times. Some cows may be less likely to give a positive reaction if they are close to calving. The test may also occasionally miss an infected animal, which may show evidence of disease later when it is slaughtered.

Testing in general is a significant burden to farmers. Testing costs farmers both time and money and contributes to over 70% of the administrative burden associated with TB.

Cattle Movements: The UFU believe that Northern Ireland's "eradication" programme is one of the most robust in Europe with regard to cattle movements. Herd restrictions can cause significant overstocking difficulties for farmers who rely on selling animals to markets.

Research into BTB: Minister O'Neill has allocated £4m for research and studies into TB. It is important that this money is not spent on studies that "reinvent the wheel". Any research that is done should concentrate on providing evidence for a wildlife intervention policy.

Other Areas of Importance

Compensation: The UFU's position on compensation is very clear. Until the outstanding TB control issue of disease in wildlife is addressed our members are unwilling to consider any changes to compensation arrangements for TB and therefore the UFU believe the current arrangements must be maintained.

Conclusion

DARD's existing TB policy will not eradicate the disease from Northern Ireland. Cattle control measures are only one aspect of dealing with the disease and until meaningful action is taken to deal with all sources of the disease, particularly wildlife, farmers will have to continue to carry the burden of an ineffective policy. For over six decades TB has blighted the industry and unless policy changes are made it will continue to do so. A series of measures must be implemented by the Minister immediately to allow progress with eradication to be made.

Yours sincerely

John Thompson

JOHN THOMPSON