

Refreshing Wales' Bovine TB Eradication Programme

May 2022

Background

1. The Welsh Government is in the process of refreshing its Bovine Tuberculosis (TB) Eradication Programme. On 28 April the Committee held a one day Inquiry focusing on the themes of the Welsh Government consultation which was issued as part of the refresh, namely on testing, informed purchasing and payments. This report draws together the findings from the evidence the Committee received and is designed to feed into the Government's policy refresh.
2. The Inquiry took oral evidence from academics and NFU Cymru and the Farmers' Union of Wales. The Committee also received written evidence from the Farming Unions (NFU Cymru and FUW) and RSPCA Cymru.
3. The Committee identified five key areas Members believe the Government should act on as part of the refresh. These are engagement with farmers and the wider industry; informed purchasing; testing; compensation; and wildlife.

Engagement with farmers and the wider industry

4. A key issue highlighted by witnesses was the need to ensure that farmers and others involved in tackling bovine TB (including farmers' private vets) are treated as equal partners by Welsh Government in TB eradication, and that policies require buy-in and ownership from farmers too if they are to be successful.
5. When asked about good practice in other countries, Professor Glyn Hewinson highlighted shared partnership governance as key to good practice. He told Members it was *"really important to get buy-in"* in New Zealand and Ireland *"there is joint government and industry decision making that really brings people on board"* and this approach helps build more trust.



6. When asked about international best practice, Roger Lewis (NFU Cymru) also highlighted a joint approach to governance. He told Members *"Governance would be something that some countries have probably gone down the road of, this far more joint approach between the industry and Government, and possibly more responsibility being passed on to the industry."* However he caveated this saying that in those other countries farmers had the ability to control all issues surrounding the disease including wildlife.

7. Professor James Wood explained that empowering farmers and the wider industry would be key to ensuring the policy is successful:

"I think that there is good evidence from countries like New Zealand, but actually also Australia as well to an extent, that having empowered farmers and their veterinary advisers is very good for disease control. Farmers are quite good at disease control when they think they're in control, and they haven't felt like this for a long time with bovine TB. Anything that you can do to make farmers think that this is part of their responsibilities for farming, rather than being something that resides with Government or Government agencies, has to be a good thing."

8. Professor Wood highlighted that this would be hard to achieve but that *"we need to think very carefully about any measure that we introduce and the impact that it might have on empowerment of farmers."*

9. Members strongly support these calls for greater engagement with farmers and the industry. The Committee believes that co-production and ensuring farmers feel they share responsibility with Welsh Government for developing and implementing policy will be vital to support efforts to eradicate bovine TB.

10. Members heard evidence that the TB Advisory Service in England is working very well. Dr Gareth Enticott, from Cardiff University, told Members it has *"clear leaders to it, who are out there in the community spreading a message and working with farmers"* and that the Welsh equivalent did not have the same visibility. Roger Lewis from NFU Cymru said the service was very well respected and offers *"valuable advice to farmers on ways they can perhaps mitigate the chance of this disease becoming embedded within their herd. So, something like that would be very valuable."*

Recommendation 1. Welsh Government should follow a co-production route when developing policy around bovine TB eradication.

Recommendation 2. The Welsh Government must treat farmers and the wider industry as equal partners in policy development and ensure farmers feel empowered by the refreshed eradication plan and responsible for its success.

Recommendation 3. The Welsh Government should engage with the Governments of New Zealand and Ireland in order to learn lessons from their success with engagement of farmers and the wider industry.

Recommendation 4. The Welsh Government should engage with DEFRA so that it can learn lessons from and replicate the success of the TB Advisory Service in England.

Informed purchasing

11. There is currently a voluntary approach to informed purchasing in Wales – farmers are encouraged to make their herd's testing history available at the point of sale to allow assessment of TB risk level. However, this is not mandated. In November 2019 the Minister said officials had started working with DEFRA on a mandatory informed purchasing system.

12. Dr Gareth Enticott explained that the question as to whether informed purchasing should be made mandatory was a complex one, but overall advocated a system where the information is made available to all. He told Members:

"There are two assumptions to the question: one, does it make a difference; and two, the mandatory aspect, does that create any harms? I think, in relation to the mandatory side of things, people will talk about, 'As soon as you do this, you create a two-tier market.' I think that already exists anyway, and farmers are operating on rumour, hearsay, local knowledge, whatever it is, in order to make their decisions. So, I don't believe that that is actually a barrier. And in fact a more equitable, fairer system would be to make that information available to everybody, so that everybody is in the same boat and some people don't have special access to some knowledge that other people don't."

13. Professor James Wood told the Committee:

"I think it's very important that it's not just at markets, but that the information is also available at point of purchase when private sales are being conducted, given how important private sales are in particular for local movement, and given that we know how important local movement is in the transmission of bovine TB between farms locally. I think making it mandatory does not mean that anyone is going to use it, and

I think that's one of the greatest challenges in relation to that information. I don't know what the solution is there, but if it's not mandatory then it probably won't be available in most cases and therefore won't be useful."

14. Professor Glyn Hewinson added *"I've come across cases while looking at the data where farmers have clearly been trying to do the right thing by buying animals from a low-risk area, but actually it was a high-risk animal in a low-risk area because it's moved from. So, actually, having not just herd level but animal-level information would be helpful"*. He went on to say *"in principle, free information to allow purchasing, I think, is a good thing, but that data needs to be made available rapidly."*

15. Conversely Roger Lewis told Members he was concerned about informed purchasing creating a two-tier system:

"Because if we have a situation at the point of sale where a lot of information is divulged to the buyer, they've got to make a decision, and it'll be risk based, and that's exactly why we're thinking, or Welsh Government is thinking, to bring it in. But the reality is that, in virtually all cases, when animals get the point of sale, they do find a home. So, this is where we're coming from with regards to the two-tier market, that animals that are deemed as high risk will have a lower value. And then we've got to ask ourselves, I suppose, then: what have we achieved that day by having that information at the point of sale?"

16. He also raised concerns about farms in high risk areas, particularly those who have a history of TB being penalised by the system when they are clear of bovine TB. He told Members that while the system might help a farm in a high prevalence area that has never had bovine TB, that it wouldn't help *"farms that have this disease embedded within their herd, and periodically might go clear of the disease. I think that could create real problems with selling animals."*

17. Roger told Members *"there is an appetite from a large number of buyers to have that information available. The key to it is that it is simple to access, it's accurate, and that farmers can make quite a quick decision"*.

18. Elin Jenkins of FUW warned that unilateral introduction of informed purchasing could cause issues. She told Members *"There have also been comments made from our members in that informed purchasing, if it's not applied across the UK and if it's not applied, for instance, in English markets, people in Wales will be sending their animals to England to be sold because*

there won't be that necessary requirement for mandatory information shown at sale. So, that is risking our livestock markets in Wales."

19. The Welsh Government is developing a multi-species database, EID Cymru, which aims to be *"an effective multispecies traceability system which will assist in limiting the impact of a disease outbreak, improve data and continue to provide consumers with assurance of the provenance of their food."*

20. Professor Glyn Hewinson told the Committee he thought EID would be really key to help farmers understand the risk of specific animals – as opposed to the risk of the herd. However he cautioned that it *"will be really important if you are going to use this animal movement information and all the animal data from that—and I would suggest in a central hub—that the system speaks to all animals across the epidemiological unit, which is Great Britain. So, it is really important that EID Cymru speaks with the Livestock Information Programme work that's going on in England and the animal movements system in Scotland."*

21. Dr Gareth Enticott also raised concerns around a divergence of animal tracing systems. He told Members *"disease knows no boundaries"* and that currently *"we've got databases that work across England, Wales and Scotland, and we may end up with each country kind of going in slightly different directions and that just causing problems."*

22. Both of the farming unions were also supportive of the introduction of EID Cymru. However, they also had concerns around compatibility between the different UK administrations.

23. Roger Lewis told Members:

"If we're moving away from BCMS [British Cattle Moving Service], which I found to be a very, very good portal, and if we're going to move to EID Cymru, I think the potential for this is huge, and not just as a database for the actual animals' ID and movement history et cetera, but for health statuses. And, obviously, TB falls into that. Infectious bovine rhinotracheitis, bovine viral diarrhoea and a lot of other diseases need to be, sort of, bolted on to this. And the key thing is that this software is set up at the start to be able to cope with all of this. All too often we have systems built that then we're told can't cope with this change or you've got to start from scratch. So, this is where we're coming from. EID Cymru must be compatible from day one with all this information. Even if it's actually not used on day one, it needs to have the ability to

cope with this process. And yes, it is the obvious portal for this sort of information to come from."

24. Elin Jenkins echoed the concerns around cross border compatibility. She told Members *"it's important that there's cross-border communication between the Welsh, the English, the Scottish and the Irish versions of EID Cymru"*.

25. The Committee believes if Welsh Government introduces mandatory informed purchasing it must be done correctly to ensure it does not cause problems for farmers, particularly those in high bovine TB prevalence areas. As part of this Welsh Government must ensure high quality data is used when building the system to ensure the system is accurate, and the data must be available rapidly when needed. Given cross-border trade, Members are also concerned about unilateral introduction in Wales if the system is not introduced in England.

26. Members believe that EID Cymru could be a useful and powerful tool for farmers which will help them make informed decisions when purchasing animals. However Members are concerned about both the system's capacity and inter-operability with other systems across the UK. Members believe it is vital Welsh Government ensures EID Cymru is fit for purpose on day one and that it is inter-operable with the other systems across the UK.

Recommendation 5. If the Welsh Government introduces mandatory informed purchasing the system must be based on high quality accurate data which needs to be made available rapidly in a system that works.

Recommendation 6. If the Welsh Government introduces informed purchasing it should work with the UK Government to introduce compatible systems in Wales and England at the same time due to cross-border movement of animals.

Recommendation 7. The Welsh Government must ensure EID Cymru is accurate, can hold information on all relevant diseases and is compatible with systems used across the UK.

Testing

27. Pre (PrMT) and Post (PoMT) Movement TB testing is used to help reduce disease spread through cattle movements. The Welsh Government states that it views PrMT and PoMT as essential measures and proposes expansion of the requirements. The Welsh Government says there is a *"strong case"* for increasing the sensitivity of PrMT, with the trade-off being a reduction in specificity – better identification of infected cattle but more false positives.

28. Professor James Wood told Members "England and Wales use the least sensitive tests as screen tests of any countries in the world, and we are countries that have some of the greatest challenges with bovine TB—persistent challenges—and it's my view that the two points are related." He went on to say:

"I think it's very important to recognise the key role that testing can play, and actually in the need that we have across Britain, not just in Wales, for increasing the sensitivity of testing, in particular when you have identified infection on herds or perhaps small clusters of infection."

29. The Committee heard that increasing testing would not have the ultimate impact of eradicating the disease if the right test is not used, and that there could be increased bureaucracy with little result. Elin Jenkins cautioned Members against the move to blanket use of gamma testing, a more sensitive test, as it will result in a "3.5 per cent false positives in TB-free animals" which would increase animals being removed from farms and increased compensation as a result. She added that she didn't "think there's any evidence or scientific analysis or impact assessment that's been made on using the gamma test as a blanket in Wales, nor anywhere else, in an eradication programme across the world".

30. Both NFU Cymru and FUW raised concerns about the socio-economic impact of PoMT. Roger Lewis told Members the NFU "firmly believe that it is absolutely vital that the pre- and post-movement structure is strong and robust. I think we're definitely behind the reintroduction of pre-movement testing in the low-incidence areas" but that "Post-movement testing is a little bit more of a divisive question when we look at it within the membership" and that PoMT wasn't always practical.

31. Elin Jenkins told the Committee FUW's members "did note the merits of pre- and post-movement testing". However they have concerns around the "lack of real epidemiology evidence in supporting the need for this, and how effective or cost-effective it is, and how much influence these tests are going to have on eradicating TB in Wales, or at least keeping TB out of the low-incidence areas of Wales."

32. Professor Glyn Hewinson told the Committee that there was a cost benefit issue to be balanced around false positive/negative results and that the long term benefit of disease reduction needs to be taken into account:

"there is absolutely an economic impact in terms of when you spread disease out of a herd and create new areas of infection. The cost-benefit analysis—and this comes to

your question earlier about proportionality—is very difficult, so when people look at cost and benefit, they often just look at the cost, rather than the long-term benefit. Of course, stopping disease is very hard to monetarise, but, obviously, from a disease control perspective, you want to try and stop disease spreading out of a herd"

33. Whilst in principle the Committee supports increasing pre and post movement testing and the sensitivity of tests used, Members are very concerned about the potential socio-economic impact. Before a final decision is made on increasing testing and the sensitivity of testing Welsh Government must undertake a full socio-economic impact of the moves.

34. Members believe the Welsh Government needs to understand the full, long-term impact of the testing regime, including the socio-economic impacts of more testing and the use of higher or lower sensitivity tests. Members hope undertaking this work will help the Welsh Government make an informed socio-economic decision, support affected farmers and in turn increase farmer 'buy in' to the new scheme.

Recommendation 8. The Welsh Government should undertake a detailed socio-economic impact assessment of any changes to the TB testing regime. The outcomes of this assessment should be shared with the Committee.

Recommendation 9. Whilst undertaking its impact assessments on testing the Welsh Government should look at the long term impact, including the ongoing need to compensate farmers for removed cattle into the future.

Shortage of vets

35. The UK is currently facing a shortage of vets. The shortage is not limited to TB testing, or the farming sector. The Committee heard concern that this is having a direct impact on farms and TB testing.

36. In its written evidence the FUW stated that its "*members have previously received penalties due to a lack of veterinary personnel and resources*" they went on to say that "*extra resources must be in place prior to the introduction of any increased testing requirements*".

37. Members heard that the use of lay testers may be an option to create testing capacity. Professor Glyn Hewinson told Members "*The thing I think is worth looking into is the use of lay testers, which may help to support the increased testing that is being suggested. Some practices may welcome that, others may not, and it may be that you need a blended approach in Wales to using lay testers plus vets to do the TB testing, and that may be a way that you can expand the capacity that you have.*" Professor James Wood added:

"Lay testers have to work as part of a veterinary team and, indeed, there is real scope for faster introduction of greater numbers of lay testers. They don't require four, five or six years of veterinary training and registration, but they do need very specific and very careful training. I think there are real advantages to be explored with that" ... "I think, generally speaking, the lay testers are only able to do the skin testing and are typically not used for the collection of blood samples necessary for the gamma interferon test. So, greater use of that is going to be constrained by veterinary capacity and by the laboratory capacity needed to develop that as well."

38. Dr Gareth Enticott explained that "*TB testing is not an attractive job for vets.*" He added the introduction of lay tests may help support retention of vets in mid and west Wales but also cautioned that not every veterinary practice may welcome the idea of lay testers.

39. Both the NFU and FUW support the use of lay testers. They both felt this could be used to free up farms' private vets to support farmers who are in TB breakdown. Elin Jenkins from the FUW said she felt farmers and the industry should be involved in choosing where any money made by using lay testers was spent.

40. Members were particularly concerned to hear that farmers have been penalised as a result of a lack of veterinary resources and feel this is a matter that needs urgent attention from Welsh Government. Members noted that all the witnesses they took evidence from supported the use of lay testers, and as such feel this is an avenue Welsh Government should explore as a priority. However they note both farmers and the veterinary practices will need to be engaged in the process of introduction – and a blended approach may be required to suit all needs.

Recommendation 10. Welsh Government should prioritise exploring the viability of introducing TB lay testers with the farming and veterinary industries.

Compensation

41. The Welsh Government currently pays farmers compensation based on the market rate for each animal slaughtered as a result of TB infection. Compensation for TB is a recurring area of overspend for the Welsh Government which the consultation document describes as "*unsustainable*". The consultation sets out the following options to replace the existing system:

- tabular valuation system where an average market price is used to calculate compensation;

- tabular valuation system with an increase to payment based on membership of an approved animal health accreditation scheme; or
- payments determined by an industry led independent group. An industry levy would partly fund TB payment costs.

42. The Committee heard strong opposition to the tubular system of compensation from both NFU Cymru and FUW. Roger Lewis had cattle isolating due to positive tests at the time he gave evidence and he took Members through the considerable financial and economic costs of that to him. He told Members:

"to move to a system that will overvalue, and undervalue—let's not forget that—going forward, would be devastating for this industry. So, our preferred compensation payment regime is the one that is in place now, where a valuer, a trained professional, comes along and gives a value for that individual animal."

43. Elin Jenkins expressed sympathy for Roger Lewis's situation and told the Committee *"The current valuation regime, which utilises an independent industry expert to produce valuations is far fairer than the proposed tabular system. But, having said this, as Mr Lewis alluded to, the current compensation system is far from perfect, with no compensation given for lost revenue, loss of milk production, loss of breeding lines, and so on."*

44. RSPCA Cymru said all three proposals for compensation were reasonable. They felt that the industry-led group option would be a way of *"giving farmers more control and encouraging communities to hold their own to account."* They also stated that the presence of a robust plan, and compliance with the plan should be a precondition to receiving state funded compensation.

45. Dr Gareth Enticott questioned the aim of changing compensation rates *"if the aim is to save money and make things quicker and simpler, then it may be perfect for that, but at the same time we're also talking about using compensation as a kind of incentive or a change in compensation values to disincentivise certain behaviours."* He felt *"it might be a better way, or more helpful way, of thinking about how compensation is used as to turn it around and how can compensation be used as a reward"*. He also repeated his point that ensuring farmers feel part of the system and that the system is fair will be vital.

46. Professor Glyn Hewinson supported the call for using compensation as a reward. He told Members *"there's a sweet spot in terms of compensation that you need to hit, where you are not incentivising people to farm TB, but, equally, you are rewarding them sufficiently to comply with*

the disease control systems that are in place. And I think the evidence at the moment is that most farmers do comply with that."

47. Members understand that the current compensation programme is expensive. The overall programme refresh must reduce the number of cattle that need to be culled and consequently bring this cost down. Members support the calls for using compensation payments as a reward for good farming practices within the system. Members also feel that gaining farmer buy-in to any new system will be vital to its success, in line with the Committee's views noted under the engagement section of this report.

Recommendation 11. The Welsh Government should use TB compensation payments to reward good farming practices.

Recommendation 12. If the Welsh Government chooses to introduce a tabular compensation system, they must ensure that farmers rearing high value (e.g. pedigree) cattle are not treated unfairly and do not lose out.

Wildlife

48. The Committee heard evidence around the lack of data on the role of wildlife in spreading TB. Roger Lewis told the Committee:

"We get the message from Welsh Government with regards to culling here in Wales, but what I struggle with, and I think the farmer who was depopulated the other day will struggle with, is that he potentially could restock his farm in a period of time, but he doesn't know [...]the level of disease that is out there within the wildlife. And the absolute minimum Welsh Government should be doing is finding a policy whereby we can establish the level of disease in the wildlife. The badger found dead survey is one way of doing it, but it is not comprehensive enough. And I think they're missing a trick here, because if you had a farm, a persistent breakdown farm, and you could prove to that farmer that, actually, the wildlife on his farm are clean, or have very low levels of TB, I think that the attitude of that farmer would change, because he would know that the actual problem is embedded within his herd, and the way he approaches future testing would change."

49. Professor James Wood told the Committee the wildlife issue is "often cited as, 'You can't possibly control the disease without dealing with the reservoir'" but that the problem is not straightforward as we do not currently know how important badgers are for bovine TB transmission.

50. Roger Lewis summed up the issue around data saying *"As a farmer, the real frustration for me and my fellow farmers is the lack of understanding on how this disease is transmitted. By that, I mean transmission between bovines, between wildlife and bovines, and within the wildlife population as well. I find it amazing, here in 2022, that we've not got concrete science on that."*

51. Roger Lewis said that we should be looking at badger vaccination as a way of mitigating that disease and that you can get herd immunity without vaccinating the whole badger population. However he went on to say *"the problem in Wales, here, is that we've got such a huge population of badgers that vaccination becomes uneconomical."*

52. RSPCA Cymru welcomed the focus on cattle rather than badgers in the proposals. They said that *"the disease is primarily spread between cattle"* and that cattle movements are considered to be the main risk in the transmission.

53. The Committee is concerned about the lack of data around bovine TB in wildlife. Members would like the Minister to write to the Committee setting out the current data Welsh Government holds on bovine TB in wildlife and any plans to collect further data.

54. The Welsh Government should work with farmers to gather better localised information on infections in wildlife. This should particularly include gathering data on the level of infections on farmland where a farm has gone into breakdown.

55. The Committee is interested in the research Welsh Government have undertaken. Members are particularly keen to test the Government's views around how economical badger vaccination is.

Recommendation 13. The Minister should write to the Committee setting out:

- Whether the Minister feels she has the correct level of data on the incidence of bovine TB in wildlife to model how extensive the badger vaccination programme needs to be;
- The Minister's views on how economical badger vaccination is; and
- Any cost analysis of badger vaccination (if undertaken) or Welsh Government plans to undertake this work.

Recommendation 14. The Welsh Government should work with partners to undertake a study to increase knowledge of how bovine TB is transmitted between cows and wildlife, between wildlife and cows and within the wildlife population.