Department for Environment, Food and Rural Affairs

The Bovine TB Eradication Advisory Group (TBEAG) for England

Thirty-second TBEAG meeting – 25 June 2015

Agenda

1. Introduction

2. Approved Finishing Units (AFUs) with grazing – consultation proposal

3. APHA report: The role of the new “TB Leadership Team for Delivery”: headline issues

4. Edge Area – bTB surveillance results in 2014 and policy review

5. Enhancing the sensitivity of TB testing regimes – next steps

6. The EU Animal Health Regulation and future rules for bovine tuberculosis eradication programmes

7. Any Other Business

1. Introduction

1.1 The Chairman welcomed members to the Thirty-second meeting. Apologies were received from Richard Davis, Martin Howarth and Nick James. Michael Seals, Chair of the Animal Health and Welfare Board for England (AHWBE), was only able to attend the first half of the meeting, and Nigel Gibbens joined the meeting in time for the item on TB testing regime sensitivity.

1.2 The minutes of the previous meeting were passed without substantive comment. There were no new declarations of interest. It was noted that from the next meeting the AHWBE secretariat would provide TBEAG secretariat support and with this in mind Helen Jeffries was taking over writing the minutes.

TB Programme Update

1.3 The TB Programme reported that it is looking to consult on further cattle measures later in the year. The call for views on non-bovine TB controls will also form part of the wider bundle of consultations. On 30 June the interactive map showing TB breakdown locations (‘IBTB’) will be launched. IBTB will be showcased at July’s livestock event in Birmingham. Risks from dispersal sales are being addressed with industry – a new scheme will be piloted offering farmers looking to sell a high proportion of their cattle a
Defra-funded TB test. Rolling out the SW advisory service nationally depends on RDPE funding.

1.4 A biosecurity five point plan will be publicised, but this will be not until after the livestock event. Risk based trading messages will be included. Feedback from auctioneers on the new equipment displaying TB risk information to support risk-based trading will be received shortly. There has been some positive coverage in the Westmorland Gazette which is reassuring following some earlier concerns expressed at TBEAG.

1.5 Delivery of the next batch of the badger BCG vaccine has been delayed. The shelf life of the new stock will be shorter than previously, which will mean it cannot be used for the first part of the 2016 season. The order will, therefore, be reduced to 1400 doses. Defra will be holding a Supplier Day in July in advance of an Invitation to Tender for a commercial delivery partner with the capability to assemble an oral badger vaccine.

1.6 TBEAG members asked for a further update on wildlife in addition to that relating to vaccines. The TB Programme reported that progress was being made and to do things properly required them to be done in the right order. The starting point to any successful wildlife management programme is knowing what wildlife is actually present and where. Further announcements relating to wildlife control will be made in due course.

1.7 Summing up, the Chairman said that the frustrations and concerns expressed had been registered but felt there was merit in the view that it was worth taking the time to do things properly.

2. Approved Finishing Units (AFUs) with grazing – consultation proposal

2.1 Following a discussion at its last meeting TBEAG asked for a further paper setting out the risks associated with AFUs with grazing.

2.2 The paper summarised the current position regarding AFUs with grazing, which can only be established in high risk areas in England where infected badgers are known to be a problem. They are not permitted under EU law and the FVO’s report of its 2011 audit was very critical of our control of AFUs; the rules were tightened up after that. AFUs can source stock from infected and uninfected herds – cattle held in with grazing AFUs are TB tested every 90 days. The 2014 FVO audit was more positive, but some concerns remain in that it noted ‘the complexity of animal trade networks and the risks associated to a very mobile cattle population, including considerable involvement of animals from restricted herds’. We need to be comfortable and confident that AFUs are biosecure and safe and do not undermine the TB Strategy. As a result of APHA checks before the 2014 FVO audit we discovered that a small number of AFUs have been allowed to include dispersed grazing land – APHA attempted to address this on a case by case basis but legal action resulted (from an affected AFU operator) and we have now agreed with industry that changes to operating rules could only be considered after a consultation. Dan explained that the TB Programme would like explore three options:
• Discontinue AFUs with grazing (not unanimously supported)
• Not allow AFUs to include non-contiguous land
• Discontinue these units in the cull areas.

2.3 TBEAG members raised a number of issues which provoked discussion. Ending AFUs in cull areas might prevent farmers wishing to join cull areas. The evidence (2013) showed slightly higher levels of slaughterhouse cases from AFUs than for other types of herd in the high risk area. Over the course of a year we know that around 50% of cattle sourced by AFU operators come from restricted herds. The precise proportion of animals from OTF and breakdown herds will vary according to the time of year and commercial/farming considerations but the veterinary view is that AFU herds are high risk and cannot be considered Officially TB Free (OTF).

2.4 TBEAG members heard that if you follow only the science, the evidence is that grazing AFUs should be discontinued. But the TB strategy also requires us to consider the economic sustainability of the cattle farming industry – which means we have to weigh up the balance of risk. If AFUs are to continue they must be rigorously controlled. Non-contiguous land, for example, should not be included. If we continue with the high risk units, the risk form them to other cattle herds and to wildlife must be minimised as much as possible.

2.5 The most pressing question is what to do with these existing AFUs with fragmented land (there are approximately 20 of them). The planned consultation would seek to regularise the situation. There was also the difficult matter of consistency in approving AFUs – especially those in the LRA, (which are different from the HRA AFUs in that they cannot take restricted stock). Colleagues from APHA SW acknowledged this point and said that it was already under consideration and that they would return to this in their presentation.

2.6 TBEAG agreed to proceed with a consultation as described in the paper.

3. APHA report: The role of the new “TB Leadership Team for Delivery”: headline issues

3.1 APHA colleagues explained that the Agency now has a Leadership Team for TB Delivery; the team is led by Nick James who is now head of veterinary TB field delivery. The team is based around the country at a number of locations, and is still comparatively new. It provides veterinary and scientific advice to inform animal health policy and delivery. The team either supplies advice direct (via a mailbox) or is able to source the necessary advice from throughout APHA. The team writes advice that fits the policy brief but that also ensures the policy is deliverable on the ground. The APHA TB Leadership Team will be working across GB including both Scotland and Wales.
3.2 Feedback showed inconsistency in AFU approvals decisions, as mentioned in the previous item. The guidance has now been reviewed and amendments have been proposed. A work group has been established bringing together all the TB lead vets to agree a way forward with greater consistency. Regular teleconferences will take place to ensure this consistency is maintained. Most of the changes are clarifications to the existing instructions – any others are made in consultation with policy colleagues. At present Animal Health officers are allowed to inspect isolation units but in future this work should be done by vets. Final approval and sign off for units will be limited to a small number of very experienced vets. Biosecurity requirements are being clarified. Isolation units can be approved with grazing and APHA is looking to ensure greater consistency in this also.

3.3 Grazing of Commons is another area of work and a working group has been set up. There are considerable variations in how Commons are used across the country. There are about 2500 registered Commons in England and over a thousand in Wales. There is lack of visibility of movements onto and off the Commons and there is limited recording of movements. Excluding cattle from Common grazing would have huge implications but allowing cattle from breakdown herds to graze on Commons also potentially has a big impact on disease spread. The issue of Commons is widely recognised but very difficult to tackle.

3.4 TBEAG members asked how significant the issue of Commons is and whether it is where resources should be prioritised – many of the Commons are small parcels of land. This is potentially a huge amount of work – APHA is aware of this and is prioritising the TB control plans for the largest commons located in or near the High Risk Area, such as Dartmoor, Exmoor, Bodmin Moor and The New Forest. There is a very long list of potential areas of work for the new team and not all of these will be completed in the next year. There is a Better Outcomes on Upland Commons project that will bid for HLF funding – it would make sense to join up. Patrick Begg and APHA would pursue. The work that Tim Morris of AHWBE has been doing on voluntary codes of practice for Commons was also noted: Michael Seals would make the necessary links to that work.

Action: Patrick Begg and APHA to ensure that the relevant links were made in order that the bid for HLF funding by the Better Outcomes on Upland Commons Project was comprehensive.

Action: Michael Seals to make the link to the work that Tim Morris of AHWBE has been doing on voluntary codes of practice for Commons. Details to be shared with TB Programme.

3.5 APHA reported having produced some instructions on non-bovines, and camelids in particular. There had been problems in the field in dealing with TB incidents in camelids, but the enactment of new TB legislation and the introduction of mandatory blood testing of TB-infected and at-risk herds in October 2014, along with the new operational guidance, will help APHA field staff. When the Ops Manual instructions have been completed they will be reflected in the OV instructions as well. Tuberculin skin testing of alpacas and llamas is tricky and there have been documented cases of zoonotic transmission to one alpaca owner and one private vet. Pigs have also been a tricky issue – due to the difficulty
in getting off restrictions some large pig breeding farms with confirmed *M. bovis* infection. There are also sporadic problems with cats, mostly in suburban cats in the high risk area. A couple of large dairy goat herds have also had to be killed out in the high risk area.

3.6 TBEAG discussed TB in cats; as there’s a limited amount that can be done other than public health advice and messaging, how much effort should be put into this area? Public Health England is concerned and all cases of *M. bovis* infection confirmed by culture are being reported to them for risk assessment and TB screening of household contacts. When it comes to companion animals, APHA’s role is mainly to facilitate the submission of tissue samples for bacteriological testing and genotyping, notify PHE and provide advice to owners and private vets. Although TB in cats, camelids and pigs has a potentially large media and political profile, it is of limited relevance to the epidemiology of bovine TB and it is not a major concern for the TB Strategy, which is focussed on bovines.

3.7 The comment was made that camelid owners – many of whom keep the animals for non-commercial purposes - are not always as well informed about TB as (say) cattle owners, despite the fact that an APHA leaflet about TB in camelids had been produced in 2010, but was later withdrawn to be updated. A mandatory government surveillance scheme for TB in camelids had been proposed in the past but the business case was weak. Therefore, voluntary surveillance is being pursued and there has been some good progress in getting buy in in the sector.

4. **Edge Area – bTB surveillance results in 2014 and policy review**

4.1 TBP presented a paper summarising the key epidemiological findings in the Edge Area during 2014 and made recommendations for additional controls to manage the spread of the disease in this area.

4.2 Overall numbers of total and OTFW breakdowns have decreased in England during 2014 by approximately 2%, but in the Edge Area have increased by 7% and 16% respectively. It was questioned whether the increase in cases in the Edge Area might have resulted from increased surveillance. This is only true to a point because, once the rise in test numbers is factored in, the herd incidence of bTB in the Edge (expressed as new breakdowns per 100 herd-years at risk) had also increased in 2014 compared with previous years.

4.3 Cases in the Midlands and South East edge areas are clustered on the Western side of the areas, closer to the High Risk Area, as would be expected. The large number of new breakdowns in Cheshire meant these were analysed to split out those from different sources of infection. TBP reported that Cheshire has a higher proportion of internal movements of cattle (as opposed to crossing county boundaries) than other counties in the edge area, which is interesting when viewed alongside the spoligotype information on the map. Locations of infected found-dead badgers identified by the University of Liverpool were also mapped.
4.4 Analysing the most likely sources of breakdowns in the edge area, 25% were from introduction of infected cattle and 33% were from infected wildlife, while 33% were undetermined. The remaining sources were recrudescence from a previous breakdown and local spread from neighbouring holdings. In the Midlands, there was greater incidence from infected cattle rather than wildlife. There was a discussion about the difficulty of differentiating between recrudescence (residual cattle infection from a previous TB breakdown) and wildlife (badgers) as the most likely source of infection. It was clear that an element of informed judgment was required by APHA veterinary officers when determining infection source. However, it was also noted that, at least from studies in the HRA, there was a correlation between infected badger locations and where breakdowns had been judged to result from wildlife exposure.

4.5 There was a discussion about the significance of making a distinction between OTFS (Officially TB-free Status Suspended) and OTFW breakdowns and it was noted that when communicating externally we should not distinguish between these two types of breakdown, and this is consistent with the change to categorization in the HRA proposed in the upcoming cattle measures consultation.

4.6 Enhancements to edge area controls were being considered but it was recommended not to change the geographical boundaries at this stage. A list of considerations were presented relating to any enhancements including evidence, timing (changes could most conveniently be implemented on 1 January 2016) and potential costs. Feedback from APHA about the six-monthly testing in Cheshire showed that 13.5% of the new breakdowns reported in the Edge portion of the county during the first four months of 2015 had been detected earlier by the new testing regime.

4.7 Relating to the possible enhancements, it was suggested that evidence on TB prevalence in badgers in the edge area was a top priority and that this should be commissioned. TBEAG members noted that the group had mentioned the need for surveillance on disease prevalence in badgers on a number of occasions and some frustration that this had not been taken forward, although there was also recognition that there were financial constraints operating.

4.8 Some members expressed concern about the spread of bTB in Cheshire, coupled with concern that present measures might not be sufficient to halt and reverse this trend. It was also suggested that six-monthly testing might have resulted in increased detection rates, and the group was reminded that prevalence and incidence in the Cheshire edge was still less than in most counties of the high risk area. TB Programme officials expressed a willingness to listen to any and all suggestions relating to what else might be done in Cheshire to reduce the incidence of disease. The point was made that cattle in this area of Cheshire was currently receiving the most surveillance for TB of any area in the EU and that APHA had undertaken additional TB testing of herds in the adjoining 4-yearly testing area of Stockport in Greater Manchester.

4.9 The question was raised as to what action would be taken in a year’s time if the figures continued to increase in the Cheshire Edge, including the case for culling in the edge. TB Programme officials responded that if such a proposal were to be made it would
need to be consulted on. It was also observed that the randomised badger control trial had related to high risk, high density areas and therefore the evidence from the RBCT might not apply in areas such as Cheshire. The meeting was reminded that it had always been planned to allow at least one year’s worth of six-monthly testing to determine its effectiveness.

4.10 The meeting welcomed the fact that a TB infection prevalence survey in found-dead badgers was among the four proposed enhancements to Edge Area controls and highlighted the importance of this work, stressing that the group was content for all the recommendations in the paper to be taken forward, subject to the views of Ministers.

5. Enhancing the sensitivity of TB testing regimes – next steps

5.1 This paper summarised the veterinary recommendations to further enhance the sensitivity of the TB testing and control regime in the high risk area for roll out in 2016. The annex to this paper was an update/revision of an earlier version of a review paper originally tabled in 2013. Five recommendations had previously been put to the group:

i. Improve the quality assurance of the delivery of skin testing;
ii. Remove some pre-movement testing exemptions;
iii. Introduce statutory post-movement testing of cattle entering the low risk area from annual testing areas;
iv. Effectively treat all breakdowns in the high risk area as OTFW (require a minimum of two SITs (Short Interval Tests) at severe interpretation;
v. Increase the targeted use of interferon-gamma (IFN-γ) parallel blood testing to help resolve TB breakdowns in the high risk area.

5.2 Progress had been made – the first two recommendations above had been delivered in 2014 and those relating to post movement testing in the low risk area and treating all high risk area breakdowns as OTFW have been included in the forthcoming cattle measures consultation. The interferon-gamma test is still not widely used in the high risk area, however. It is only used as part of the enhanced protocol for dealing with persistent breakdowns (more than 18 months) – these are significant in terms of cost but a small proportion of all breakdowns in the high risk area. Given the new Government’s intention to widen badger controls in the HRA, there is an opportunity to tackle the problem of residual cattle infection at the end of a breakdown, which has been estimated to occur in approximately 20% of herds that come out of restrictions.

5.3 The group was asked to consider recommendations for enhancing the TB testing regime in the high risk area in the coming year. For example, enhanced testing could be rolled out in parallel with a roll out of a culling regime.
The following were proposed:

- The gamma interferon test should be compulsory in all lesion or culture positive cases in the high risk area (with a number of additional criteria specified). This proposal also included enhanced powers for vets to impose necessary biosecurity measures on those farms benefitting from the use of this test;
- All skin tests carried out in spread tracings moved from infected herds to be read using the severe interpretation;
- All inconclusive skin test reactors (IRs) that resolve upon re-testing in the high risk area and edge area herds to be restricted for life to the holding where they were disclosed.

The first of these proposals would substantially increase expenditure in terms of laboratory testing and compensation payments. TBEAG was asked to consider whether they should be recommended to be scoped, or whether there were alternative measures that should be preferred.

5.4 There was overall support for the second and third recommendations above. However, a concern was raised that treating IRs in the low risk area differently to those in the high risk and edge areas would be confusing for industry. While the risk difference between IRs in the high/edge and low risk areas was clear, from a messaging point of view the inconsistency would need to be explained carefully. Additionally, it was suggested that farmers with “resolved” IRs could be allowed to pay for a private gamma test to clarify the TB status of those animals at their own expense; where the animal was clear at the gamma test, then restriction on the individual animal could be lifted. In response, there was concern that lifting the restriction on an animal clear at the gamma test would not offer the same level of assurance as lifetime movement restrictions.

5.5 A concern was also raised about leaving former IRs on farms in perpetuity when these animals would be perceived as high risk. In response, it was suggested that this kind of complexity would encourage farmers to take ownership of their own risk and the behaviours that alter that risk. It was flagged that it would be possible for farmers to commit fraud and bypass the movement restrictions by altering the identity of resolved IRs, but there was no evidence that this happens in Ireland where the policy is already in place. The Cattle Tracing Scheme (CTS) could be used to monitor compliance with the restrictions, by carrying out spot checks on a percentage of these animals every month, as it is done with statutory TB pre-movement testing.

5.6 In relation to the IFN-γ test proposals for the HRA, it was questioned whether limiting those to herds with OTF status withdrawn was appropriate. It was argued that, although all TB reactors can potentially shed the bacterium, the presence of visible lesions (VL) indicated that the disease had been present for longer in an animal and thus VL and culture positive cattle were more likely to be infectious. So, concentrating the blood testing effort in VL/culture positive breakdowns was likely to have more impact on the spread of TB – this was rebutted by the point that in cattle a lesion can be contained in a granuloma in the lymph nodes and therefore lesions need not increase infectiousness. It was argued
that the messaging to the farmer needed to be taken into account, but opinion on how this should be managed differed. There was concern that promoting the test to the farmer on the basis that the results were conclusive could generate confusion about the status of OTFS herds. There should be no suggestion that a herd not receiving the IFN-γ test meant that it was not positive – farmers could easily jump to this erroneous conclusion.

5.7 Given the costs of the measures and the potentially high number of eligible herds in the HRA, it was suggested that efforts could be focussed in areas/counties of the HRA where it would be possible to move to disease free status most quickly (albeit long term). This could make the proposal more affordable.

5.8 TBEAG members noted that the IFN-γ test has a bad reputation amongst farmers. Concern was expressed that using it in badger cull areas might potentially put off farmers from wishing to participate in the cull. It was proposed that the wider use of the test should be put off until after the second year of the cull.

5.9 A meeting participant pointed out that APHA were not tracing cattle from OTFS breakdowns and that rules for movements of cattle between TB restricted herds may need to be tightened.

Action: The group agreed that all the recommendations in the paper, to further enhance the sensitivity of the bTB testing and control regime in the high risk area for roll out in 2016 should be taken forward for scoping and costing (TB Programme to pursue).

Action: The recommendations should also be included in the delayed consultation on the additional TB control measures for cattle herds. Identifying and taking forward improved testing remained a key research priority. Providing the minutes and the consultation document reflected the full discussion of this item, it would not be necessary to revisit it at the August 2015 TBEAG meeting (TB Programme to pursue).

Action: In respect of movements between TB2 herds there appears to be a need to clarify the instructions that should require two more SITs for any moved animals and the herds of destination (TB Programme to pursue this with the APHA Leadership Team for TB Delivery).

6. The EU Animal Health Regulation and future rules for bovine tuberculosis eradication programmes

6.1 The paper provided an update on developments relating to the EU Animal Health Regulation – the policy team had been engaging closely with AHWBE but TBEAG members might be interested in contributing to Defra’s Technical Working Group providing advice as the detail in the tertiary legislation is developed. The new Regulation will replace current EU legislation governing TB (as well as a number of other diseases); a major
simplification exercise, it replaces around 40 pieces of secondary legislation. Given the amount of legislation replaced, however, the Regulation itself is rather long. Provisional political agreement between Council, Parliament and Commission (the triolgue) has now been reached, and the Regulation is expected to be adopted this autumn. Once it comes into force there will be a five-year transition period, in the first three years of which the Commission will develop the necessary secondary legislation. During the last two years Member States will adjust their own legislation as necessary.

6.2 The Commission has split the Regulation into packages – disease eradication is in package three and this will be discussed during 2016. Defra is raising this early in order to be able to attempt to influence emerging Commission thinking rather than waiting for the 2016 discussion.

6.3 The EU Task Force on Eradication of Animal Diseases bTB subgroup published guidance on bTB eradication programmes in 2013. It was noted that there are a lot of parallels between the guidance and the TB Strategy and it considers enhancements that we would like to see. For example, potential to use the gamma test as a standalone test, and recognition that AFUs can be useful with proper controls. Members were invited to comment on the Task Force guidance as a basis for future rules on bTB eradication programmes. TBEAG agreed to consider this further.

6.4 TBEAG members discussed the specification for the proposed Technical Working Group and queried remuneration, scope for flexibility in terms of commitment required, and numbers of members sought. TBP agreed to provide further information to members on these points.

Action: TB Programme to provide further information on remuneration, scope for flexibility in terms of commitment required, and numbers of members sought for Defra’s Technical Working Group on the EU Animal Health Regulation.

Action: TBEAG to go through the guidance from the EU Task Force on Eradication of Animal Diseases bTB subgroup in a systematic way at future meetings.

7. Any other business

A member felt that it was unfortunate that TBEAG met only two-monthly, given the amount of work going on. He also requested early circulation of papers and information to be shared between meetings.

The same member also raised concerns about cattle TB compensation rates in England compared to the more favourable rates payable in Wales.

The next meeting will take place on 25 August 2015.