BVA response to Defra Bovine tuber culosis: call for views on possible future measures to accelerate disease eradication in England

Who we are

- 1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues, employment matters and the wellbeing of the profession.
- 2. We welcome the opportunity to respond to this call for views on possible future measures to accelerate disease eradication in England. Halting the spread of bovine tuberculosis (bTB) is essential for both animal health and welfare and the profitability and sustainability of the livestock industry. It is vital that we continue to utilise every tool in the toolbox to curb this devastating disease.
- 3. We support this engagement on a range of ideas at an early stage of the policy development process. The cattle measures working group where both BVA and BCVA have been engaged alongside wider industry has been a welcome approach.

Section one: Cattle movements

Option 1: Enhancing ibTB to support responsible cattle movements.

- 4. We support this option. It's implementation must carefully consider what data are provided and seek to enable and widen access to, and use of, ibTB
- 5. As Enticott et al.¹ note, a common critique of government bTB policy has been the absence of information given to private vets and farmers about bTB incidents in their local area.^{2,3,4} We support greater provision of bTB data that is routinely collated, analysed and published showing local parameters. Therefore, we support efforts to amend ibTB to provide additional information.
- 6. Private vets are key users of ibTB. Vets who were part of the usability trials for ibTB all "welcomed the development of ibTB. Private veterinarians, in particular, were pleased to be able to see these data, suggesting that the information was vital for them to work with their clients to help them manage bTB." The provision of additional up-to-date and high-quality epidemiological data will be useful for this private veterinary audience.

¹ Enticott G, Mitchell A, Wint W, Tait N. Mapping disease data: a usability test of an internet-based system of disease status disclosure. Frontiers in veterinary science. 2018 Jan 5;4:230.

- 7. Farmers are the other key audience for ibTB. However, to date, ibTB appears to have been of limited use to farmers at auctions unless the sale is catalogued to allow purchasers to research vendor bTB status in advance⁶ and the proportion of farmers using it for risk management is unknown.⁷ Providing additional information on ibTB, including the number of years that currently unrestricted cattle herds have been officially TB free, will be of use to those farmers who already make use of ibTB ahead of making a purchase and will facilitate risk-based trading in the UK. This change may also encourage some farmers to utilise this resource ahead of making purchases.
- 8. It is essential that farms are clearly identified within the proposed upgrade of ibTB in order to facilitate its use for risk-based trading. At present they are identified as dots on a map and there may be too much uncertainty where farms are close together.
- 9. BVA supports provision of data on number of years a herd is bTB free but any other data provided needs to be carefully considered. It will be essential to consider carefully what data should be provided and how that information should be presented to deliver the desired behavioural change. Outcomes of interventions are difficult to predict, and responses vary by target groups.⁸ Behavioural science can be complex, but at a basic level, the EAST (Easy, Attractive, Social and Timely) framework, developed by the Behavioural Insights Team, can be useful.

Option 2: Mandating the sharing of information at point of sale.

10. BVA support

- accredited under the scheme, provided that accreditation was gained prior to the herd losing its OTF status.
- 20. Government should engage behavioual scientists to carefully consider how this approach could be expanded and integrated into a broader system of "earned recognition." This would allow more positive messaging to be deployed: rewarding farmers for best practice instead of just applying penalties. Recognition should be based on the past performance, biosecurity measure21(pri)anothedepng

e needed for a shift to a more behaviour-centred approach, all of which are underpin the involvement of the veterinary profession:	ned

- tests should be applied. Different tests have different strengths and weaknesses that determine their suitability in different situations.
- 37. As is the case for any disease, tests for bTB would ideally provide both high sensitivity and high specificity. However, no currently available test can provide 100% sensitivity and specificity. This means there is a need to prioritise outcomes. If the priority is to detect as many bTB infected cattle as possible, a highly sensitive test is the appropriate tool. If the priority is to avoid removing uninfected cattle, then a highly specific test should be applied.
- 38. In the SICCT test, one can adjust the interpretation (cut off) criterion that defines a positive result to manipulate the balance between sensitivity and specificity. Lowering the cut off to increase test sensitivity tends to reduce its specificity, and vice versa. At standard interpretation, the skin test has a high specificity reported to be around 99.98%¹⁸. Test sensitivity is more variable and is within the range of 50-80% at standard interpretation, depending on the stage/severity of infection and other factors.^{19,20}
- 39. Shifting the interpretation of SICCT to be more sensitive but less specific will find more infected animals as well as create more false positive results. However, at this point in the bTB disease control and eradication process in England, there is merit in seeking to prioritise sensitivity to unearth infection as part of statutory pre- and post-movement testing.
- **40.** IFN has become a key part of the bTB programmes in all four administrations of the UK. We believe government should build on success to date and continue to fund and roll-out, the IFN test as a more sensitive supplement to the SICCT and explore the potential for wider use of IFN as part of the testing regime, including pre- and post-movement testing. There is also a benefit to using the OIE-validated antibody blood tests (IDEXX or Enferplex). Using a different test alongs49006 0 .5.02 841.98JETQq0.000008866 0i0 g0 G[nti)-3(a)4ETQq0.000008866 0 598

51. A key step in achieving this aim will be deriving enough data from private voluntary use of the IDEXX and Enferplex tests in order to undertake a full cost benefit analysis. Therefore, ?governent?? should be cognisant of this when it implements Option 2, and should not just seek to allow the use of these tests but consider how to encourage their use—for example, providing compensation for animals that are culled following a positive test from a voluntary test.

Section four: Tighter control of cattle movements following the short interval

We are currently considering an option to require a further test for cattle moved out of herds that have recently come out of long-term TB restrictions.

52. We believe there may be merit in slowing down the movements off farms that have regained OTF status. In Wales, cattle cannot be moved out of a herd that has recently regained OTF status after a chronic²¹ breakdown unless those animals unde

65.	There is an opportunity with the development of the Animal Health and Welfare Pathway (AHWP) to align this option with the wider aims of the Pathway. Specifically, the ambition as set out in the Path to Sustainable Farming: An	