

# BVA response to Scottish Government Bovine Tuberculosis: Proposals to amend The Tuberculosis (Scotland) Order 2007

## Who are we

- 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, and employment matters.
- 2) BVA's Scottish Branch brings together representatives of the BVA's territorial and specialist divisions, government, academic institutions, and research organisations in Scotland. The Branch advises BVA on the consensus view of Scottish members on Scottish and United Kingdom issues.

## Response to proposals

**Q1. Do you agree with the proposed change which would mean that no samples should be taken in Scotland for TB with the intention of applying a diagnostic test, either in Scotland or elsewhere, without permission from the Scottish Ministers?**

- 3) We agree that this is an essential measure to ensure a consistent approach is taken by the competent authority in relation to bTB testing.

**Q2. Do you agree with ending the practice of using a clear final short interval test at the end of all TB breakdowns as a valid pre-movement test, including for domestic moves into Scotland?**

- 4) We believe there may be merit in slowing down the movements off farms that have regained OTF status. We have supported a similar policy in Wales, in which cattle cannot be moved out of a herd that has recently regained OTF status after a chronic breakdown unless those animals undergo bespoke pre-movement testing at least 60 days after the clearing short-interval test. This reduces the risk of moving infected cattle to other herds following the lifting of restrictions.
- 5) We ask that Scottish Government should provide an evaluation of the risk posed by animals moved off-farm shortly after receiving OTF status. To support this, the current Welsh Government policy should be evaluated, and those findings published to understand the outcome of that policy.

*interval between tests results in a potential loss of skin responsiveness and is therefore not recommended."*

- 8) Given this requirement a clear timeline should be explicitly built into the requirements to provide certainty to farmers and vets.

**Q3. Do you support the proposal to shorten the period during which a pre-movement test with negative results remains valid from the current 60 days to 30 days after tuberculin injection for skin testing of cattle, including for domestic moves into Scotland?**

- 9) We see merit in providing additional certainty to the results of a pre-movement test by reducing the period this would be valid. However, this would create a challenging barrier to trade for some cattle keepers. Additionally, government should also consider the effect on veterinary capacity of expanding the number of pre-movement tests required each year.
- 10) As noted above, the “the use of the Tuberculin PPD Kit in cattle should be avoided within 42 days following a previous administration of tuberculin PPDs”. An unintended consequence of reducing the testing validity window from 60 days to 30 days could be to see more testing within this 42 day period.
- 11) Northern Ireland will introduce this option as it is a requirement under the EU Animal Health Law. The lessons from this roll out in Northern Ireland should

**15)** More than 90% of Scotland's breeding cattle population are currently covered by Quality Meat Scotland (QMS) quality assurance.<sup>3</sup> Within the current Cattle & Sheep Standards 2022,<sup>4</sup> standard 6.9 states:

*"Each farm, must have sufficient and suitable segregation/isolation areas."*

**16)** Therefore, there should already be wide expectation that cattle should be isolated in the case of a positive bTB test. Farm assurance schemes promote high animal health and

should be shared with a farmer's private vet to allow a swift, coordinated response between all parties.

**Measure 1: Reduce compensation for test positive cattle when there is a failure to isolate cattle**

**Measure 2: Reduce compensation for subsequent reactors in the herd that are c**



