

Response ID ANON-UPXG-EN4F-H

Submitted to Consultation on proposed Bovine Viral Diarrhoea (BVD) Herd Restrictions
Submitted on 2022-12-15 14:55:03

Introduction

1 What is your name?

Name:
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2 What is your email address?

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3 Are the views and opinions in your response personal, or expressed on behalf of an organisation?

Organisation

If the views and opinions expressed are on behalf of an organisation please provide name of organisation below.:
Ulster Farmers Union

Publishing of Consultation Results

4 Please indicate if you are happy for your response to be published.

Yes

5 If you are responding on behalf of an organisation, please indicate if you are content for the name of your organisation to be associated with your response.

Yes

If you answered yes, please provide your organisation's name in the box below.:

Proposals

6 Do you agree with the proposal to introduce herd restrictions as a disease control measure for BVD in Northern Ireland?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

UFU has been lobbying DAERA for several years around the subject of additional measures, deemed necessary in order to achieve BVD freedom. Herd restrictions represents one key strand of these measures, and UFU is in support of the implementation of Herd restrictions as a disease control measure. Beyond this, a key ask of the UFU has been the implementation of neighbour notifications. UFU believes that neighbour notifications would be a key tool to help eradicate BVD from Northern Ireland. Awareness of a disease outbreak in the neighbouring location would help to heighten biosecurity protocols that a farmer takes.

7 Do you agree that the Department should restrict movements from herds that retain BVD positive animals?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

BVD positive animals are a huge risk to not only the natal herd, but to any animal which is in contact directly or indirectly with a positive animal. As such, UFU feel it is essential that any herds which retain BVD positive animals are unable to move animals from their herds.

8 Do you agree that herd restrictions should be applied to all herds that retain positive animals, irrespective of herd size or herd nature?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

There is no logic to deviate from the criteria for restricting herds. Any herd which retains a positive animal must be restricted irrespective of herd size or herd nature.

UFU is keen to ensure that appropriate communication exists between DAERA and the herdkeeper prior to a herd restriction being imposed on a herd. Beyond this, it is essential that herdkeepers can see the status of their herd on APHIS/NIFAIS.

9 Do you agree that herd restrictions should apply to herds 'associated' with the herd containing the positive animal, i.e. herds that are kept, managed or housed with the herd that has the positive animal?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

Associated herds are linked because of epidemiological reasons. As such the risk of BVD must also be managed as if associated herds were the one farm.

Timing and Application

10 Do you think there should be a 'grace period' before herds with positive BVD test results are restricted, to allow herd keepers time to retest or remove PI animals?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

A grace period is essential in order to enable compliant farmers the opportunity to re test animals. Approximately 20% of re tested animals will test clear on the re test based on rolling 12 month figures from July 2022. A grace period enables farmers the opportunity to complete resampling if desired and to determine a confirmed result for any animals requiring retest.

There is a need to utilise animal tracing abilities of APHIS and notify purchasers of animals that take place from the date of birth of the BVD Positive animal until the herd is restricted, so that purchasers can be warned of this risk.

11 If so, do you consider 28 days an appropriate initial 'grace period'?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

Given that the timescales for retesting involve a 21 day period of waiting, UFU feel that 28 days is an appropriate initial grace period. Communications must be clear from the outset, around the importance of rapid retesting in order to avoid herd restrictions. Delays in laboratory results cannot be allowed to affect a herd restriction. Where the herdkeeper has completed the required action within the required timescale, a restriction should not be applied if laboratory/postal delays cause the grace period to be exceeded. Proof of postage/sampling by PVP should be considered by DAERA as criteria for not imposing herd restrictions.

12 Do you agree that the 28-day 'grace period' should be reduced within one to two years so that eventually herd restrictions would be applied immediately, following a positive BVD result?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

Given that the direction of travel is towards eradication, the number of affected herds should always be decreasing. The reducing grace period replicates a model deployed in Republic of Ireland where freedom from the disease is almost being achieved. The journey towards eradication will involve tougher measures as we get closer to that point, and UFU is supportive of reducing the grace period over time assuming that the numbers of affected herds decrease in parallel.

Movements out of and into restricted herds

13 Do you agree that no movements should be permitted into a restricted herd, apart from exceptionally, under licence issued by the Department?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

By allowing movements into a restricted herd, we are simply exposing more animals to the potential to become infected with the virus. That said, there are times when it would be appropriate to allow moves of individual animals into a herd. For example a breeding bull. These occasions should be permitted by DAERA on a licensed move in order to facilitate ongoing business activities. In the event where a herdkeeper is blatantly ignoring regulations, UFU would support DAERA in not permitting any moves.

In the absence of a grace period, it is essential that certain moves in be considered. For instance, a suckler farmer may wish to purchase a calf to replace a PI calf that has been removed.

14 Do you agree that no movements should be permitted out of a restricted herd, apart from moves to slaughter, for disposal as an animal by-product or exceptionally, under licence issued by the Department?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

There is logic to facilitate movements beyond the mentioned criteria

15 Are there any other moves that you think should be allowed out of or into a restricted herd?

Yes

If so, please provide details. :

Only for welfare reasons as per PVP advice and in conjunction with DAERA staff.

Lifting of restrictions

16 What do you think of the Department's proposals regarding the lifting of herd restrictions?

Please provide any comments in the box below.:

The proposals are logical. With regard to Step D on page 21 of the consultation. The period of 21 days assumes that there is no ongoing transient infection – ie that the PI has only contacted its immediate neighbouring animals. UFU suggest that 21 days is a reasonable amount of time. It is essential that all untested animals are sampled and return a negative test result before restrictions are lifted.

17 Do you agree with the Department's proposal to impose restrictions on breeding age females in the herds restricted because of positive animals?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

The restrictions on breeding age females are seismic for any restricted herd. It is therefore essential that clear communication around the implications of becoming a restricted herd takes place before the implementation of any such restrictions. From a disease control point of view, it is essential that these breeding age females are restricted in a herd restricted because of retaining positive animals. This will affect a relatively small number of herdkeepers based on current figures. However the implications of restricting these females are significant and it should not be underestimated the disturbance that this could cause to UFU's members. UFU supports this based on the restrictions only applying to restricted herds. Our members must have the ability to avoid such prohibitive criteria by complying fully with the scheme. DAERA has detailed a number of ways in which these animals can become derestricted. With that in mind, UFU supports the restriction of breeding age females in the herds restricted because of positive animals being retained.

18 If breeding females are restricted, under what other circumstances, do you consider that restrictions should be removed and why?

Please give reasons for your answer.:

If there are welfare or veterinary reasons for moving an animal from a premises, then the licence should indicate precisely how the pregnant animal is to be isolated in any new premises until a Negative result is received from her subsequent calf.

If a pregnant cow under restriction aborts or produces a stillborn calf, the aborted foetus/ stillborn calf should be BVD tissue tag tested, with a Negative result, and the dam should be virus tested using a blood sample, which must also return a Negative result, before she is allowed to move.

Herds with inconclusive animals

19 Do you agree that the Department should restrict movements out of herds that retain BVD inconclusive animals?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

Statistics show that a repeat test from an inconclusive test is much more likely to return a positive result than that of an untested animal. Therefore, it is essential that such animals are restricted until a repeat test is carried out and the results are known.

20 Do you agree that restrictions on herds with retained BVD inconclusives should apply to associated herds?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

The possibility exists that the animal with the BVD Inconclusive result is infected with the BVD virus therefore it is appropriate that any associated herds, which constitute one epidemiological unit with the breakdown herd, should also be restricted. These herds are associated because of shared resource. With that resource comes a high likelihood of transmission of the disease. Therefore the same restrictions must apply to associated herds.

21 Do you think there should be a 'grace period' before herds containing animals with inconclusive test results are restricted, to allow herd keepers time to retest and if necessary, remove PI animals?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

A grace period is essential in order to enable compliant farmers the opportunity to re test animals. A grace period enables farmers the opportunity to complete resampling if desired and to determine a confirmed result for any animals requiring retest.

22 Do you agree with the Department's proposals regarding movements in and out of herds restricted because they retain inconclusive animals?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

There are specific occasions where it may be appropriate to allow a licenced move into or out of a BVDI herd. These occasions should be individually assessed by DAERA.

23 Do you agree with the Department's proposals regarding the lifting of restrictions for herds that retain inconclusive animal(s)?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

Herds with unknown status animals

24 Should the Department be able to restrict herds retaining animals whose BVD status is unknown?

Strongly Agree

Please provide any comments you wish to make to support your response, in the box below.:

BVDU animals have an unknown disease status, and therefore potentially represent a reservoir of disease. UFU understands that there are a number of herds who blatantly disregard the requirement to test animals for BVD. UFU encourage DAERA to implement herd restrictions on a risk based approach. For example, a herdkeeper who has not sampled a batch of 50 calves should be targeted immediately. Whereas, a herdkeeper who has returned full compliance with the scheme, but has had a small number of samples returned as BVDUs because of empty vials should not be targeted. Ultimately, as we move toward eradication, there will be more and more focus on BVDU animals in the smaller numbers. That said, these smaller numbers are likely to be animals which have been put to grazing and has not been possible to re sample/tag. UFU is in full support, and actively encourages DAERA to tackle with vigour those herds which are blatantly disregarding the requirement to test animals. Similarly we wish DAERA to give consideration to those herdkeepers who for management issues have a small number of BVDUs ultimately due to empty vials, but have historically been compliant with the scheme. DAERA should be required to communicate with farmers in writing prior to imposing herd restrictions. Similarly UFU wish that DAERA write to farmers who have a small number of untested animals. Such letters should be issued on quarterly basis to herdkeepers with BVDU animals present in the herd over a given age. Technology should be utilised by DAERA, with farmers being notified electronically of such alerts.

25 Do you agree that restrictions placed on herds with retained BVD unknowns should also be applied to associated herds?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

Yes, for the same reasons that have already been stated in Q9 and Q20

26 What criteria do you consider the Department should consider when deciding whether to restrict herds which retain BVDUs?

Please give reasons for your answer.:

Herds that retain BVDUs should be restricted according to the level of risk that they present. While every BVDU animal presents a BVD risk, those in herds that have had BVD infection recently (eg in the previous two years) present a greater risk. Furthermore, the risk-based approach should be undertaken using the number of BVDUs present that were born in a defined time period, for example, the previous two years, and also the total number of BVDUs present in a given herd.

27 Do you think there should be a 'grace period' before herds retaining BVDUs are restricted, to allow herd keepers time to test and, if necessary, remove PI animals?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

Herd keepers require a grace period to facilitate re testing if required.

28 Do you agree with the Department's views regarding movements in and out of herds restricted because they retain BVDU animals?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

Any untested animal has the potential to become a positive animal when tested. Herds restricted by DAERA because of BVDU presence should be fully restricted, to prevent the risk of BVD infection leaving the herd and moving to other herds.

29 Do you agree with the Department's views regarding the lifting of any restrictions that might be imposed on herds that retain BVDU animal(s)?

Yes

Please provide any comments you wish to make to support your response, in the box below.:

Herds with untested 'pre-2016 animals'

30 Do you think that there should be a legal requirement to test those animals born, or brought into a herd, before 1 March 2016 which currently have no BVD status?

Yes

Please provide any comments you wish to make to support your response, in box below.:

It should be a legal requirement to have a BVD status for every bovine in Northern Ireland.

Impact Assessments

31 Do you have any comments to make in relation to the Regulatory Impact Assessment and its conclusions, or any additional information to inform the impact/cost on farmers?

Please provide any comments you wish to make in the box below.:

UFU is aware of a number of sales of livestock to ROI which have now been cancelled owing to the different disease status of the two countries. Unfortunately NI lagging behind ROI with respect to eradication of BVD. Whilst trading of animals from NI to ROI is still possible, the logistical challenges are prohibitive. Consideration should be given to the loss of trade between NI and ROI which has already been seen and will continue to increase over the coming years as ROI's journey towards freedom will bring heightened requirements with regard to trading. This financial loss is currently undocumented.

32 Do you have any comments to make in relation to the Equality Screening document or the Rural Needs impact assessment and their conclusions?

Please provide any comments you wish to make in the box below.:

There is a huge human element which must be considered when there is a disease outbreak on farms. BVDU animals typically appear very healthy to the naked eye despite being a huge reservoir of infection. Farmers must employ their veterinary surgeon to euthanase, and arrange removal of the animal. Aside from the financial loss, this can be emotionally draining.