

Submitted to Proposed Implementation and Next Steps of the bTB Eradication Strategy for Northern Ireland
Submitted on 2021-09-10 10:23:00

Consultation Questions

A1 What is your name?

Name:
Ulster Farmers' Union

A2 What is your email address?

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A3 What is your organisation?

Organisation:
The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland with over 11,500 farm family members.

1 Do you agree with the criteria for selecting herds to receive interferon gamma testing?

No

Please use this answer box should you wish to provide any comments:

De coupling

UFU members have great concerns regarding the suggestion that DAERA can de couple the IFN-g sampling from the next skin test. TB testing is a stressful time for farmer and the animals. There are huge unseen losses from handling of cattle (injuries, abortion, absorptions, lack of thrive etc). To ask a farmer to complete a gamma test immediately after a skin test furthers this stress and unseen losses. Along with the additional labour burden that lies with the herdkeeper. The logistical burden of this proposal is too great for UFU to accept.

Herd eligibility

Herds with more than 250 eligible animals do not qualify for gamma testing – UFU members feel that DAERA should provide this service for all herds or none. To exclude larger herds with more exposure to the disease is not acceptable. Similarly to insist that a herdkeeper who meets the thresholds is forced to use the gamma test when a neighbouring farmer who owns more than 250 eligible animals is ineligible, defeats the purpose of the concept of increasing gamma testing. UFU acknowledge that DAERA state within the strategy that it is possible to complete a gamma sample over 2 days and acknowledge that this doubles the eligibility figure. Having said that, it is not without further inconvenience to the farmer. Larger herds by their nature of simply having more animals on a holding have more exposure to any disease, and bTB is no exception.

UFU do not agree with the point that states gamma testing may not be offered to small herds and rather a buy out would be considered. The NI herd by its nature has a large number of small herds. Part time farmers with another full time job. According to the 2020 census, 2605 farms have less than 10 cattle. As such this proposal affects 12.75% of the cattle producers in NI. UFU are concerned that a buy out would discourage these farmers from re entering livestock production.

UFU is of the firm opinion that the criteria for using gamma testing within a herd should not include herd size, regardless of logistics.

The interferon-gamma test has been frequently demonstrated to have a superior sensitivity but an inferior specificity when compared to the intradermal skin test. Whilst UFU agrees with most of the criteria for selecting herds for increased use of interferon gamma, we cannot support any proposal which increases the use of a test that removes an excessive amount of false positive animals, alongside a proposed reduced compensation model.

UFU would give its support to the increased use of interferon gamma testing if 100% livestock valuation payment was guaranteed for these animals. DAERA have proposed the compulsory use of gamma testing where they deem it to be required. A farmer will no longer have any say in the selection of their herd for a gamma testing regime. Whilst forcing a farmer to complete a gamma test may be deemed acceptable by UFU under certain circumstances; to forcibly remove a high number of animals from a farmer under interpretation of the results which traditionally return a high number of false positives is a difficult concept for UFU to support. But to combine the above factors with a reduced compensation model is economically unsustainable for UFU members to support. In that regard, UFU cannot support a model which makes the interferon gamma test compulsory in the absence of guarantees about compensation levels.

2 Do you agree with the proposal to introduce testing of non-bovines as deemed necessary by the Department?

Yes

Please use this answer box should you wish to provide any comments:

UFU believe that the disease should be tackled in whatever the host species is. To date only disease within bovine animals has been addressed with poor levels of success in eradication of bTB. Despite removing thousands of cattle from the production system over the last decades, TB continues to aggress the NI herd. UFU encourage DAERA to pursue the disease in all of its hosts.

3 Do you agree with the Department's preferred option for Wildlife Intervention?

Yes

Please use this answer box should you wish to provide any comments:

The Committee feel that the option preferred by the Department, a non selective cull, by controlled shooting of free roaming badgers, complemented by cage trap option, paving the way for vaccination; provides an effective model for the reduction of bTB occurrence in infected areas.

UFU note that DAERA provided their business case based on 1200km². Although correspondence with DAERA has provided reassurances that this is not a maximum, UFU wish to express the need for wildlife intervention to be considered for all problem areas as the scheme progresses. DAERA should be focussing on delivering meaningful intervention in any area which meets the criteria for intervention from the outset, with a view to achieving rapid reduction in bTB prevalence.

We also wish to highlight concern at the quoted minimum area for intervention. UFU feel that should an area smaller than the minimum of 100km² be experiencing high levels of bTB, that this area should be considered for intervention if there is evidence that wildlife are acting as a host. NI by its geographic nature has a number of peninsulas and land parcels which by their nature have physical boundaries that limit badger ranging behaviour. No land parcel should be excluded from intervention just because it is smaller than the recommended intervention area of 100km².

UFU welcome the intent of DAERA to allow farmers (if qualified) to become involved in the intervention. This represents a flexible and comparatively cost effective model when compared to other methods of intervention such as TVR which UFU are opposed to. Vaccination at current levels of wildlife population would be ineffective. Reduction of populations of infected badgers in the approved areas by controlled shooting is required to effectively reduce the wildlife burden before moving to a vaccination phase.

Controlled shooting is most effective when there is a persistent, prolonged period of action within an area which mitigates the effect of perturbation amongst badgers and as such UFU encourage DAERA to take note of successes from the DEFRA model where significant reductions in bTB have been achieved.

UFU are keen to engage with DAERA from the outset to ensure that there is an adequate supply of skilled marksmen to carry out any intervention in a responsible manner. Although modelling the intervention area on the DEFRA model, UFU are conscious of the fact that English farms by their nature are different in size and ownership. NI does not have the established structure of professional shooting companies and as such UFU are keen to appreciate how the proposed method will develop to fruition.

Although the structural requirements associated with the formation of companies and establishment of cull areas seem somewhat cumbersome, the UFU cannot ignore the great gains that have been made in England where a similar scheme was deployed and 4 years after commencement, TB incidence had reduced by 55%. As such the UFU agrees with the preferred option.

UFU have concern at DAERAs intent to implement some of the measures which have not been consulted on in the 2021 period and wish to provide some commentary on these issues despite DAERAs intent to roll out measures imminently. UFU provided feedback on many of these points back in 2017 and have asked to be part of developing many of these strategic suggestions. Four years later, and many of these points have not progressed which is disappointing in terms of progress.

3.3.2 – UFU recognise the burden that persistently infected herds bring to disease eradication. In the absence of detail around the nature of the proposed action, UFU are unable to support. UFU wish to be involved with every stage of the engagement moving forward on this point of action.

3.3.3 – UFU recognise that a risk based approach would be preferable and agree with this position. Decisions taken on the ability to re-stock a herd cannot be taken lightly by DAERA staff and it is critical that all staff are aware that their decision making has huge ripple effects on a farmers ability to generate an income. UFU wish to be involved in discussions moving forward on this matter.

3.3.4 – UFU have been lobbying DAERA officials over the last number of years about the stringent requirements of Alternative Control Herds. UFU feel that the current biosecurity requirements are too prescriptive and have been a barrier to the creation of ACHs. As such UFU welcome the willingness to engage with TBEP regarding barriers to uptake. UFU encourage sufficient uptake so that not only is the lack of ACHs addressed, but that there are sufficient number of ACHs approved that a fair market can be developed for restricted animals which require a move from their restricted herd to an ACH.

3.3.5 – UFU have a zero tolerance approach to fraud. We believe that fraud is a minute problem within the scheme and that some DAERA officials tend to have an attitude that points towards fraud being a bigger problem than it truly is. UFU have been frustrated in the past at DAERAs inability to eliminate fraud from the eradication programme. We lobbied for and welcomed the introduction of PVPs applying DNA tags. We encourage DAERA to use all tools available to remove any fraud from the system.

3.4 – UFU are supportive of the expansion of molecular techniques in order to improve understanding of transmission dynamics.

3.6.1 – UFU acknowledge that biosecurity is one of the factors which affects the transmission of disease. Where there is clear evidence that a blatant low level of biosecurity/ herd management is the case, UFU believe that farmers should be encouraged to be more proactive. UFU cannot commit to supporting this position in the absence of knowledge of how such enforcement would operate and the criteria for triggering such action. We wish to be included in any stakeholder movement on this issue.

3.6.3 UFU is not supportive of informed purchasing at current disease levels. Informed purchasing although beneficial from a buyers perspective has the potential to devalue a sellers herd. That would be acceptable if the seller was able to prevent herd from becoming infected with bTB. UFU are engaged on a weekly basis with herdkeepers who are afflicted with the presence of bTB in their herds. A farmer who operates a closed herd with good biosecurity is not immune from bTB arriving in their herd. Such a farmer would be financially penalised despite not being able to prevent the disease entering their herd. UFU was proposed to this proposal during the 2017 consultation and remains the position of the organisation.

3.6.4 Farm segregation notices have huge impracticalities and impacts at farm management level. UFU are concerned as to how this proposal could affect farms with multiple land parcels and will be keen to consult further with DAERA on this proposal.

3.6.5 bTB resistant breeding genetics would be beneficial to all farmers. UFU support the development of bTB resistance as a desirable trait and wish that it be prioritised.

3.6.6 UFU are supportive of encouraging vehicles to be cleaned and disinfected before and after making visits to markets in line with current regulations.

4 Do you agree with the Department's preferred funding model for wildlife intervention?

No

Please use this answer box should you wish to provide any comments:

Whilst UFU appreciates that DAERA wish to share the costs of a wildlife intervention program with the farming community, our members feel that they are already bearing a significant cost of bTB. The costs of the physical deployment of intervention are proposed to lie with the farmer at this stage. There is a misconceived concept that farmers are compensated for losses from bTB, this is not the case. Our farmers are paid for the market value of their cattle at the time of the breakdown. There is no allowance for the loss in income that this animal would have made for the farmer through sales of

milk, progeny or gain in liveweight for sale at a later date. Farmers already suffer financially through the loss of reactor cattle. To ask farmers to pay through a reduction in livestock valuation payments, a cap on the value of their animals and to co fund the intervention is a step too far. UFU have developed a detailed model of costs for delivering the preferred method of wildlife intervention. Based on known cattle populations, and estimated badger populations, these costs are significantly lower than the costs quoted by DAERA within the strategy. We are conscious that the biggest variable in delivering wildlife intervention is the population of that wildlife itself, which, can only be estimated at this stage. The only element of costs which remain unaffected within the consultation document are those attributed to DAERA. UFU are concerned that the preferred method of wildlife intervention attracts £9.0m of DAERA oversight costs whereas the physical delivery of the entire scheme attracts is estimated by DAERA to attract £5.0m of cost. DAERA oversight costs seem to remain fixed at £9.0m regardless of the method of intervention deployed. It seems ironic that a farmer delivered and funded scheme can be delivered for significantly less than the administration of this scheme. The UFU position is that DAERA should fund the physical deployment of wildlife intervention for an initial period in order to establish the success of any such methods. This would also give an opportunity to identify true wildlife population densities within the infected areas and establish exact costs of deployment. This would also provide an opportunity for DAERA to refine their oversight costs. Whilst our membership would potentially consider contributing to the funding of wildlife intervention after a DAERA funded trial period, this could only be achieved with guarantees that livestock valuation payments would not be reduced. Given the concerns of our membership regarding the proposed funding model from DAERA and the fact that there is a clear intent to reduce compensation levels, UFU cannot support the proposal to co fund wildlife intervention at this stage.

5 Do you agree with the Department's proposal for the introduction of a £5,000 cap on compensation?

No

Please use this answer box should you wish to provide any comments:

UFU believe that by imposing a cap on compensation, that DAERA are obliterating the top level of the breeding pyramid. Northern Ireland's farmers are successful at breeding world leading genetics. A cap of £5000 does not come close to the investment that is made by pedigree or indeed commercial farmers on a regular basis to improve their herds. The proposal to impose a cap on the payments made to farmers contradicts another proposal made by DAERA in point 3.65. DAERA state they will support industry to encourage a move towards inclusion of bTB resistance as a desirable trait in the selection of breeding material. How then can DAERA expect farmers to invest in genomics whilst simultaneously devaluing the value of the national herd through valuation reductions. For generations NI farmers have been selecting desirable traits and improving the genetics of their herds. The proposal to implement a cap on valuations flies in the face of generations of genetic gain. DAERA cite a saving of £104,500 from the implementation of a cap at the suggested value of £5000. UFU members feel that this amount of money is relatively modest especially considering NI had sales of processed food to external markets of £4 billion in 2018. Our members believe that despite a perceived saving in livestock valuation payments from the implementation of a cap, this gain would become a much larger loss to the industry when the genomic destruction of our breeding livestock becomes evident and this loss of genomics cascades from the top of the pyramid through our entire breeding herd.

6 Do you agree with the Department's proposals for a reduction in compensation?

No

Please use this answer box should you wish to provide any comments:

Whilst there is a misconceived concept that farmers are compensated for losses from bTB, this is not the case. Farmers in NI have never received compensation. Our members are paid for the market value of their cattle at the time of the breakdown. There is no allowance for the loss in income that this animal would have made for the farmer through sales of milk, progeny or gain in liveweight for sale at a later date. Farmers already suffer financially through the loss of reactor cattle and unlike in other countries such as Republic of Ireland, there is no true compensation for loss of income. To ask farmers to pay again through a reduction in livestock valuation payments is a step too far. DAERA have proposed an interim reduction in livestock valuation payments to 90% for one year followed by 75% in subsequent years. Our members cannot support this proposal. In 1998, the compensation was increased to 100% with the underpinning reason for this increase being a recognition that the intradermal skin test was a flawed test. This test remains the predominant method of testing cattle for bTB. The test, unchanged, remains flawed. Farmers cannot be expected to bear the burden of their herd values being reduced by a significant percentage in the coming years due to a disease which they are not in control of its spread. UFU does not agree with the intent stated on page 5 of the consultation document where it is stated that changes will be made to compensation. It is UFU's agreed position that no change will be tolerated to livestock valuation payments until after there is meaningful intervention in wildlife which achieves a reduction in bTB to under 2% of herds. In 1998, DAERA increased the compensation to 100% citing that the lack of wildlife intervention had not been addressed. UFU will only consider wildlife intervention to have been addressed after its implementation shows meaningful results. DAERA state that a 75% compensation model would align the bTB programme with the compensation regimes for other diseases, such as Brucellosis. UFU are appalled at this comparison. When compensation was reduced for Brucellosis to 75%, the herd incidence was 0.02%. With 2021 levels in excess of 8.5% for bTB, any reduction in payment to our members is unpalatable, but to cite the reason as alignment to other diseases is devoid of consideration for the industry. TB prevalence in NI is at level where for many insurance is unobtainable. And further to that, the premiums for any areas where cover is available are beyond affordability for our members. If bTB was reduced to below 2% of herds, farmers would have the option of purchasing insurance and at a more reasonable cost. Whilst UFU recognise the pressure on the public purse, we had previously proposed a levy as a method of contributing to the financial deficit which bTB costs the taxpayer. Unfortunately DAERA do not consider a levy to be appropriate, citing that a levy would bring about the desired culture change and shared ownership of the disease that would come from an adjustment in compensation arrangements. UFU believe that the proposed reductions by DAERA would be catastrophic to NI farmers and cannot support this proposal.