

UFU believe that the proposed reductions by DAERA would be catastrophic to NI farmers and as such object forcefully to any suggestion of its implementation.

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 the 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.

There is no acknowledgment of the huge costs which TB costs the cattle industry. We often hear about the cost to the public purse. In publishing these proposals, DAERA have shown no acknowledgment of the huge costs already absorbed by every herdkeeper in NI in order to comply with the requirements of the current regime.

DAERA have proposed an interim reduction in livestock valuation payments to 90% for one year followed by 75% in subsequent years. Our members are ferociously opposed to this proposal. 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 of which they are not in control of its spread.

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 2023 levels in excess of 10% 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. It is unfair of DAERA to make comparisons across different diseases, as each should be considered on its own merits.

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 did not consider a levy to be appropriate, citing that a levy would not bring about the desired culture change and shared ownership of the disease that would come from an adjustment in compensation arrangements. UFU have since been a key driver in the formation of a voluntary levy that collected funds to deliver wildlife intervention in NI. A significant funding pot was collected by industry and the levy, now paused after DAERA Judicial Review outcome, is poised to resume when an effective wildlife intervention model is underway. The funds are ring fenced for the industry elements of the TB programme.

DAERA cites their proposal to reduce compensation would be required to bring about attitudinal change within the farming community.

UFU believe that the biggest attitudinal change needs to come from within DAERA. Since direction was given on the revised TB strategy by the previous DAERA Minister, the entire agricultural industry has worked tirelessly to bring about the objectives of this strategy. DAERA by contrast seemed to find excuses for delay and brought suggestions that were devoid of

epidemiological reason. In essence, in the absence of guidance provided by TBEP, DAERA were setting wildlife intervention up to be a failure.

The launch of the revised strategy to eradicate TB in 2022 brought real hope to our members for the first time in generations. It set out a series of measures to be implemented. In March 2022, herd incidence sat at 8.32% with 12,594 skin test reactors in the previous 12 months. The published figures quoted by DAERA within the consultation are for October 2021 (and do not take into account of any reductions in surveillance that began to feature after this point in time). Herd incidence is now 10.31% of herds in excess of 18,000 skin test reactors being removed annually. This represents a phenomenal increase, with all of the pain being absorbed by NI farmers. This increase must be attributed largely to the failings of DAERA to take any action to tackle the disease. The current programme, is struggling to control TB in NI, let alone eradicate it. It is UFU's agreed position that no change will be tolerated to livestock valuation payments until prevalence reduces to under 2% of herds.

DAERA also cite an increase in the average value of TB reactors from October 2021 to October 2023 by £242 per animal. This is purely indicative of the market price of cattle. Markets have been performing strongly during this period and the TB programme has followed these trends. However, this should not be given as a reason for "compensation" reduction. Markets tend to fluctuate. In recent months, the market for livestock, particularly dairy cattle has eased again. No doubt DAERA valuers will be aware of this trend. The average value of TB reactors should not be considered as a metric to consider change. The number of TB reactors paints a true picture of the reasons behind the inflationary cost of the scheme.

Further, the average market value of an animal removed under the bTB Programme in October 2021 was £1,632.50. This had risen to £1,874.36 by October 2023.

TB prevalence in NI is at a level where for many insurance is unobtainable. The availability of TB insurance is now limited by providers to those herdkeepers that have a no evidence of local outbreaks, that their own herd is considered to be free from the disease and that the herd is currently on an annual testing interval. The AHT requirement alone limits the availability significantly. 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, insurers would be keener to underwrite the risk, and farmers would have the option of purchasing the insurance cover at a reasonable cost.

At the announcement of the revised TB eradication strategy in March 2022, the previous DAERA minister "decided not to introduce the proposed changes at this time but to review them in two years following the implementation of the Strategy". Two years later, no progress has been made by DAERA in the implementation of this strategy. DAERA have failed to even discuss the establishment of any Regional Eradication Partnerships which was a key aim of the strategy. There has been no progress on the establishment of Disease Response Teams. DAERA have also rolled back on IFNG testing instead of increasing its deployment in herds which would benefit from its use. There has been no progress made with the testing of non-bovines. Biosecurity and herd health planning have only been discussed by industry. DAERA have only recently become interested in this as the EU Animal Health Law mandates compliance to this element. The action taken by DAERA on wildlife intervention was found to be lacking in sufficient administrative detail by the court of judicial review. There has been no amendment to the criteria for Alternative Control Herds (a key ask for the industry and one which only DAERA

can deliver). In summary, DAERA have made no gains towards the implementation of any measures which would reduce the incidence of the disease, and the results are evident.

The only accomplishment by DAERA in the eyes of our members is the rollout of this consultation which ironically will have no direct impact on the disease incidence itself. How then can our members accept a reduction in “compensation” having seen nothing but ongoing failure from the competent authority.

By contrast, UFU have driven great progress with the industry. Following the delivery of the revised TB strategy, we promptly met with DAERA to request immediate delivery of the revised criteria for Alternative Control Herds. UFU viewed these herds as a key pressure relief point from TB-infected farms. There is still no development with this key ask. Our main focus was on the industry elements of the strategy. UFU were instrumental in the formation of a voluntary levy to fund these elements which was successfully established. We have successfully coordinated the training of sufficient contractors to deliver wildlife intervention in the initial zones. UFU was key to holding DAERA to account in identifying areas for intervention. Our members should have been rewarded by the fruits of their efforts at this stage. It is a shame that the Competent Authority did not have the same desire to drive forward on this strategy.

DAERA staff resource is commonly cited as being an issue by the current CVO. DAERA have repeatedly failed to attract staff into their field offices, resulting in continual decreases in the ability to effectively deal with TB breakdowns on farms. TB outbreaks are not properly investigated. DAERA officials are more reactively dealing with the aftermath of an outbreak, rather than trying to identify the source of the outbreak and deal accordingly with the source of infection. Our members feel the pain of this daily.

Options to make savings within the current TB programme:

Lateral Check Tests (LCT) are set by DAERA immediately after the identification of TB on a farm. This is done with a blanket approach of mandating all perceived “in contact” farms to carry out an LCT. Whilst this would seem a reasonable approach, UFU feel that the broad-brush tool, used by DAERA is continually wasting public funds by mandating the testing of herds, which are not necessarily truly at risk. Proper conversations and risk-based assessments could be used to negate the need for LCTs which are not truly at risk to the infected herd. Factors other than geographic location should be considered more widely.

Slaughter only herds – there are hundreds of herds within NI. These herds, by their nature, tend to be beef finisher herds, purchasing cattle and slaughtering cattle on a weekly basis. Any herd that is purchasing cattle regularly in a country with 10% herd incidence is likely to be caught up in a series of requests to complete backward check testing. The vast majority of these herds will therefore be compelled to test their entire herd at least four times per year. The irony of the situation is that, while slaughtering on a regular basis, the disease status of the herd can be monitored relatively effectively at post-mortem inspection. More often than not, our members report having completed a clear skin test on farm, only to have lesions reported at slaughter the following week. UFU have approached DAERA in the past to suggest that such herds would have the option to reduce testing interval to annual, subject to being restricted from live sales. These herds could continue to be monitored via post-mortem inspection, with the judgment of the local DVO, who could prescribe further skin testing, should the lesion rate increase at slaughter. This would represent prudent use of public funds, rather than the wasteful outcome

of the current programme, which our members cite as being ineffective within these types of herds.

Salvage of reactor cattle currently returns in excess of £10m to the budget. However, there remains only one meat processor who is responsible for collection and processing TB reactors. While DAERA cite this opportunity to be available by tender, UFU would like to see other processors entering into this market, in order to drive competition and therefore return in increased value to the budget.

However, the opportunity to make the most meaningful change still exists, and UFU are keen to move forward. True savings could be sustainably brought to the programme by implementing a full suite of measures that tackle the disease head-on. The most impactful of these measures is wildlife intervention. In the previous decades, other jurisdictions that have moved towards wildlife intervention are reporting reductions in TB breakdowns in excess of 50% after four years of intervention.

A recent study by Colin Birch *et al*, analysed the effect of badger culling on bovine TB rates across 52 areas in England. Researchers found the herd incidence rate of TB reduced by 56% on average up to the fourth year of culling interventions. The study authors concluded that their analysis “indicates the importance of reducing transmission from badgers to reduce the incidence of TB in cattle”.

Aside from the biodiversity benefits, improved cattle health, and a positive effect on the mental health of the farmer, a disease eradication programme which aims towards eradication (rather than control) will sustainably return money to the NI executive year after year. These other jurisdictions are now looking towards moving a vaccination phase in wildlife, which will see these regions accomplishing UFU’s ultimate vision of healthy cattle and healthy wildlife.

Tackling bTB effectively is a key element to further improving the environmental footprint of the NI ruminant sector. Our members are already engaged with driving efficiency at all levels on farms. Currently 1500 bovines are being culled every month because of TB. It is fair to assume that almost all of these are removed before they have reached their maximum production efficiency and as such leave a significant footprint with their early departure from herds.

Impact of the proposals

The proposals will further devastate every farm that is a victim of bTB. A reduction in the current payment regime will be the difference in a farm business surviving a TB breakdown or entering extreme economic hardship. The membership of UFU has been outraged by these proposals and will mobilise every resource available to ensure they do not become a reality.

The quoted figure of up to £9.3m seems like a significant saving, until one considers the GDP from NI Cattle (and sheep) farmers is cited to be worth £2.8billion pounds. This represents a very poor return on investment. To risk the viability of businesses within a sector that typically returns seven times the amount of money invested into it is not a sensible decision.

DAERAs proposals are estimated to return £9.3m to the public purse. However, in the absence of actually tackling the problem, these savings will be short-lived. The disease will continue to be rampant in our members’ herds and within the wildlife population. Any savings seen in the short term will soon be eroded and the cost of the programme will continue to break record levels in time.

