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Dr Sean Brady, Chairman of the TB Implementation Group, Backweston Administrative Building, Young's Cross, Celbridge, Co Kildare

15th June 2021

Dear Dr. Brady,

Further to the discussions at the most recent TB Implementation Group meeting on the issue of Wildlife Control and in particular the resources attributed to this key component of the TB Eradication Strategy, IFA are requesting this issue be addressed in further detail at the next Implementation Group meeting.

All stakeholders recognise and accept the critical role effective wildlife control plays in reducing and ultimately eradicating TB from the national herd.

The TB programme requires a significant increase in staff resources for the Wildlife Control Programme in order to ensure its effective implementation. A fully resourced and effectively implemented Wildlife Control Programme is fundamental to achieving the objective of TB eradication

The resources currently available to the programme are not adequate to achieve this objective. In addition, based on the DAFM End of Year Report for the Wildlife Programme in 2019, the expansion of the vaccination programme has increased the unit cost of each badger treated without increasing the level of programme application on the ground.

The resources that are required in the programme are operatives on the ground implementing the sett mapping and critically the capture programmes in a timely and effective manner following TB outbreaks and frequently after outbreaks to reduce the badger population to the required density of 0.5 badgers per sq/km.

New sett identification and activity scoring of all setts, not just those where captures took place the previous year are fundamental requirements for an effective programme.

The former Minister for Agriculture Michael Creed, in writing to the TB Forum, committed the resources necessary to implement measures that will reduce TB will be provided to the programme.

DAFM have reiterated this commitment on numerous occasions in the Forum including in the letter dated 4th June 2019 to the Forum chairman.

However, this commitment has not been honoured in proposals to-date, we are not seeing the increase required in DAFM staff and contracted personnel for the Wildlife Control Programme to have it implemented effectively, timely and frequently as is necessary to expedite eradication of the TB.

Based on the staff resource figures provided by DAFM to our last meeting the programme is severely under resourced to implement effectively the measures required to eradicate TB.

Attached is a breakdown of the numbers of personnel in comparison to the numbers of TB breakdown herds per county clearly showing the urgent need for significant increases in staff numbers in all counties.

The overall national picture of just 51 DAFM personnel to cover the countries 28 distinct counties/regions of 24,874 quartiles that are each 3sq/km in size clearly shows the deficiencies in staff resources assigned to this key issue in eradicating TB from the national herd.

In 2020 based on the provisional figures provided there were 4,624 new herd restrictions alone, equating to 1 wildlife control programme operative on average to every 90 herds. This does not include areas under capture from previous years outbreaks.

Attached is an analysis of TB incidence per county/region ordered from highest to lowest based on the number of breakdown herds the Wildlife Technical Officer is responsible for.

Based on the data one operative was responsible for 269 breakdown herds in Co. Meath with a further 10 responsible for 100 to 150 breakdown herds, this level of Technical Officer support for the Wildlife Control Programme is unacceptable and is not facilitating the effective and timely implementation of the programme.

Based on the data analysed areas where Technical Officers had less than 50 breakdown herds and the subsequent capture programmes to oversee and implement TB levels averaged 2.63% Herd Incidence compared to the National average of 4.34% and the average in counties/regions where operatives were responsible for over 100 breakdown herds of 6.03%.

This clearly highlights the positive impact on reducing TB levels adequately staffed Wildlife Control Programmes within counties/regions have on TB levels and conversely the negative impact in counties/regions that are under resourced.

IFA have clearly and consistently set out the importance of a fully resourced effective wildlife control programme to achieve the objective of TB Eradication, including in our submission to the Joint Oireachtas committee on Agriculture.

The section on our Wildlife Control Programme demands from the submission is set out below for your information.

IFA Proposals for Additional Policy Measures to Eradicate TB

Wildlife

The effective management and control of the wildlife susceptible to TB is vital in eradicating the disease from the country. This must continue to be the key policy in the enhanced TB programme.

The existing Wildlife Control Programme must be appropriately resourced to ensure timely and effective captures take place surrounding all TB outbreaks where wildlife is associated with the breakdown.

The programme must be extended to proactively reduce densities of wildlife, including deer, in advance of major infrastructural works and deforestation commencing to protect cattle from TB outbreaks that have been all too common as a result of wildlife disturbance throughout the country.

Badger density reduction must continue to be the primary focus of the Wildlife Unit with no further expansion to vaccination areas until concerns raised as to its effectiveness have been appropriately addressed.

A National Deer Management strategy must be developed and resourced to reduce deer density throughout the country to the levels that are sustainable within their natural habitat and at which they are not a disease threat to farm animals.

The Department must provide the supports and oversight to implement a deer population reduction programme surrounding TB outbreaks.

IFA are requesting DAFM provide a detailed overview of the staff resources that have been available to the Wildlife Control Programme on a county/region basis since the programme commenced in the early 2,000's. Commitments have been given to provide additional staff resources and this must not be diluted by replacing operatives who have left the area.

The target must be to have Technical Wildlife Officers with the required Farm Relief Operatives to carry out the sett surveying, activity monitoring and capturing in an effective, timely and frequent manner to have an impact on the TB levels in the country. Based on the analysis of the data provided by DAFM this requires Wildlife Technical Officers for every 50 breakdown herds which equates to a doubling of the current staffing resources in the programme.

If these targets are not met for the Wildlife Control Programme the TB programme will not achieve the objective of eradication and farmers support for the new strategy will be severely challenged.

Additional on farm controls to eradicate TB will not be acceptable to farmers while the key wildlife control aspect of the programme remains grossly under resourced.

As outlined, we are requesting this issue is addressed at the next Implementation Group meeting and the commitments given by DAFM and Minister for Agriculture Michael Creed to the TB Forum are honoured in the Wildlife Control Programme in the new TB Strategy.

Should you require any further information or discuss this issue in more detail please feel free to contact me.

Kind Regards,

Pat Farrell

Chairman IFA Animal Health

Pat Famell

County	Provisional New Herd Restrictions 2020	Number Wildlife Technical Officers at 07/05/21	No. Breakdowns to Technical Officer	Provisional Herd Incidence
Meath	269	1	269	7.61%
Longford	75	0.5	150	3.26%
Wicklow West	72	0.5	144	14.34%
Galway	346	2.5	138	3.24%
Sligo	130	1	130	3.90%
Cork North	427	3.5	122	7.91%
Monaghan	282	2.5	113	7.09%
Clare	265	2.5	106	4.54%
Мауо	211	2	106	2.46%
Tipperary South	157	1.5	105	4.89%
Westmeath	202	2	101	7.14%
Laois	144	1.5	96	5.56%
Wicklow East	95	1	95	9.31%
Cavan	234	2.5	94	5.12%
Cork South	223	2.5	89	3.98%
Tipperary North	216	2.5	86	6.89%
Carlow	43	0.5	86	3.38%
Kerry	166	2	83	2.62%
Louth	82	1	82	7.32%
Offaly	160	2	80	5.62%
Kildare	75	1	75	4.44%
Limerick	143	2	72	2.80%
Wexford	134	2	67	4.59%
Roscommon	141	3	47	2.78%
Kilkenny	111	2.5	44	3.86%
Donegal	82	2	41	1.61%
Waterford	56	1.5	37	2.79%
Leitrim	59	2	30	2.09%
Dublin	24	0		7.74%
Total	4,624	51	91	4.34%