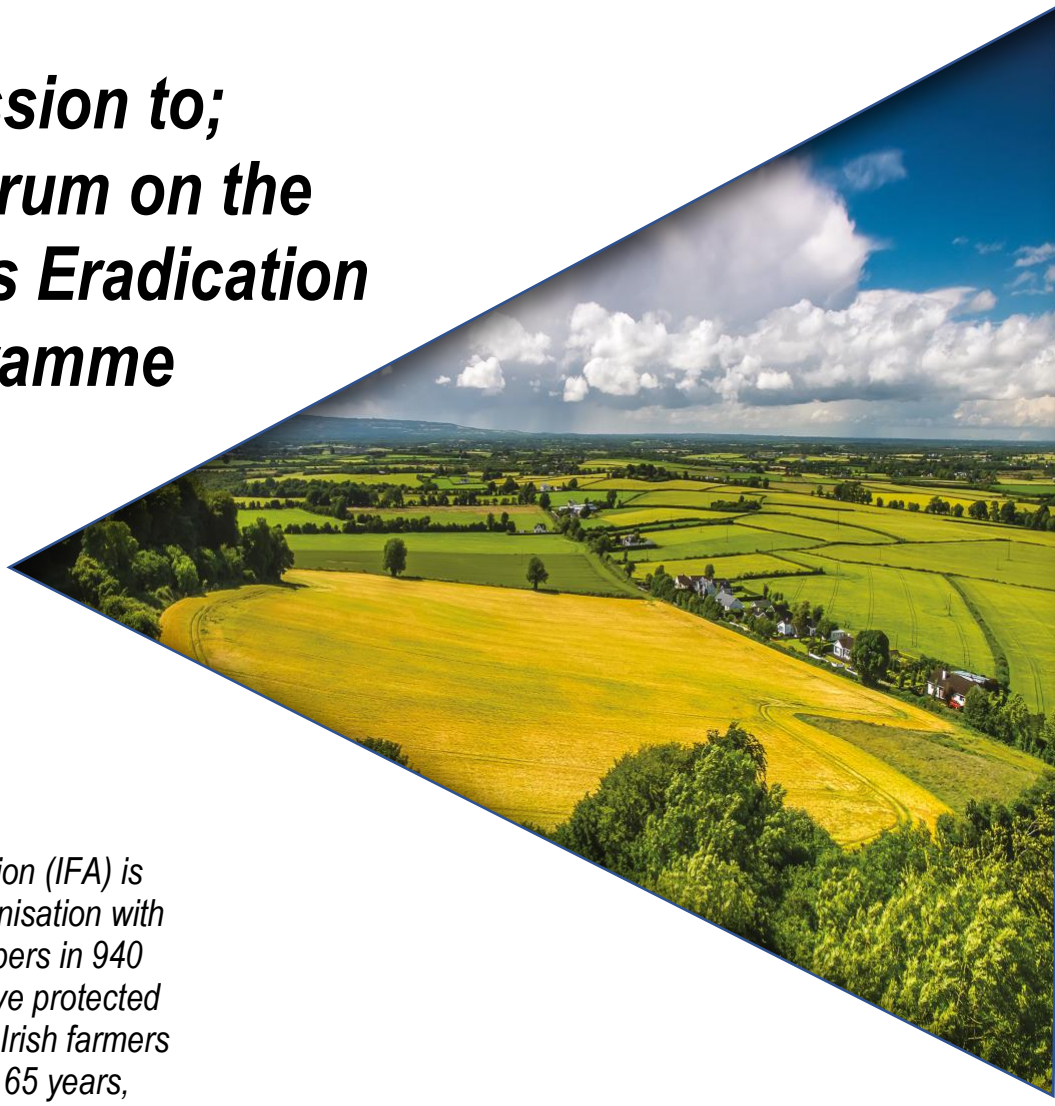
Submission to; The TB Forum on the Tuberculosis Eradication Programme



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The Irish Farmers' Association (IFA) is Ireland's largest farming organisation with approximately 77,000 members in 940 branches nationwide. We have protected and defended the interests of Irish farmers in all sectors for more than 65 years, lobbying and campaigning for improved conditions and incomes for farm families.

Introduction

The current TB situation must be brought under control. In the past 12 months, over 6,000 farmers have lost over 40,000 productive animals from their farms through no fault of their own. This must stop.

Farmers are the only stakeholder directly impacted by the TB programme and its associated costs. Farmer contributions to the programme extend to over €30m in annual testing fees; approx. €9m in disease levies; and approximately another €30m in labour.

They provide facilities for over nine million animal tests, bringing the total contribution to almost €70m before the actual cost impact of controls and animal losses are quantified.

The current programme is not working and must be revised. Difficult decisions must be taken. These decisions must be on enhancements to the programme that will make a meaningful difference to TB levels.

They should be proportionate and practical to implement at farm level, with minimal impact on normal well-established farm practices and maximise use of the current tools and policy options available.

Any additional burden imposed on farmers in the TB programme must be fully compensated for.

Wildlife continues to be the most significant driver of between farm spread of the disease and it must be addressed effectively in a new enhanced TB programme. Farmers are prohibited from taking the most effective measures on their farms to stop badgers infecting our animals with TB. It is the responsibility of the DAFM to implement a programme that removes this threat from and around our farms.

The inclusion of vaccination in the Wildlife Control Programme since 2018 has severely undermined the effectiveness of the programme and has exposed farmers unnecessarily to TB outbreaks on their farms.

The inclusion of vaccination as an integral part of the Wildlife Control Programme was justified by the DAFM in a study carried out of its effectiveness in seven trial areas, with the effectiveness based on an undisclosed acceptable increase in the levels of TB in cattle.

The study used to validate the decision taken to commence widespread vaccination was titled – '*Is moving from targeted culling to BCG vaccination of badgers associated with an unacceptable increased incidence of cattle herd tuberculosis in the Republic of Ireland'.*

These areas were targeted based on having had a good density reduction programme implemented over the previous five years and had low levels of TB in the bovine population. Most of the areas considered to be vaccination areas currently by the DAFM do not now meet the criteria set when originally rolling out the vaccination programme.

In effect the Department of Agriculture expanded vaccination areas in the wildlife programme from 2018 onwards in the knowledge this approach would lead to what they deemed an acceptable level of increase in TB in cattle.

The ineffectiveness of vaccination as a key component of the wildlife control programme has been further compounded by the lack of a population control mechanism in the programme in vaccination areas, a fault identified in studies presented to the TB forum and the inconsistent approach to capturing and vaccination within these areas.

Numerous farmers throughout the country in vaccination areas have reported no activity from the wildlife programme on or around their farms for periods often spanning three years or more. The levels of vaccination required within the badger population clearly was not achieved, leaving these farmers exposed to the risk of TB breakdowns, which have now occurred with huge numbers of productive animals taken from these farms and the associated financial and phycological impact on these farm families.

If the DAFM are serious about resolving the current TB situation, then they must accept the findings of their own studies in relation to the vaccination component of the Wildlife Programme. It has failed spectacularly and is costing farmers and the exchequer well over €200m annually.

The vaccination programme should never have continued following the findings of the initial seven areas where it was trialled. The report of these trials clearly outlines the problems found in these seven areas. It was irresponsible to continue this policy position and the decision to do so has cost farmers dearly over the past seven years.

We must also the consider the actual cost per badger of the vaccination programme, the staff requirement, Veterinary, TAO and FRS operative, while adding no value to reducing the levels of TB nationally.

In the late 1990s, TB reactor numbers were over 40,000 annually. The wildlife programme was implemented nationally in the early 2000s based solely on density reduction. By the mid-2010s TB reactor numbers were reduced to fewer than 15,000 a year and only started to really increase again from 2018 onwards when the DAFM moved from density reduction to vaccination in the wildlife programme.

Movement of animals has been highlighted by the DAFM as a significant contributor to TB spread. Accepting that some bovine animals which move to new holdings may

introduce TB to the herd, the extent with which this contributes to the current TB situation has been greatly exaggerated.

No studies have been presented to IFA that show animal movements contributing to TB introduction to farms that warrant the emphasis the DAFM are putting on this issue in the TB program.

Accepting the need to also address this source of TB introduction, the measures must be proportionate, targeted, and practical to implement at farm level. They must respect EU and international health certification requirements and be costed for financial impact at individual farm level.

In this submission, IFA will be proposing measures that address this issue comprehensively but in a proportionate and practical way while protecting the credibility of the tests and the market access requirements our export trade adheres to.

These proposals address concerns in relation to the role of animal movements in the introduction of TB to herds and are an alternative to the DAFM suggested 3-year restrictions on some animals within TB breakdown herds that has been the focus of some recent media coverage.

The request from the DAFM at the last TB Forum meeting for stakeholders to make submissions on enhancements to the TB programme is a reasonable and fair request.

However, huge concerns remain for IFA in relation to DAFM's capacity to adequately resource even the current programme before we commence discussions on enhancements.

The resources in this respect that we are specifically referencing are the staff resources across all sections of the TB programme: veterinary, technical and administrative.

There are currently over 6,000 herds restricted, over 40,000 animals removed from our herds in the past 12 months yet the DAFM staff allocation to the TB programme in several areas is less than that attributed when we had fewer than 20,000 TB reactors and under 4,000 herds restricted.

Local DAFM offices are informing our members of the difficulties they are having in providing the appropriate time to herd breakdown investigations, the administration section has still not processed the payments farmers are due in the compensation schemes since 2023. Farmers are waiting up to 12 months to have their arbitration cases heard are just some examples.

Despite an increased annual funding allocation to the Wildlife Programme, bringing it to over €9m, and its critical role in removing the most likely source of TB introduction

to the farm, the programme remains grossly under resourced at TAO and FRS operative level.

The updates we receive at the TB Implementation Group meetings from the wildlife unit are of the continuing failings in the DAFM to fill critical TAO positions to implement the programme on the ground.

In advancing discussions on enhancements to the TB programme the first issue to be resolved is the capacity of the DAFM to resource the programme.

It is a futile process agreeing enhancements to the programme if they cannot be implemented in a timely, effective and consistent way on the ground.

Our experience to-date of changes agreed to the programme has been DAFMs failure to implement the changes, significant delays in implementation, inconsistent application of changes, inability to implement changes due to staff shortages. Examples of this include the agreed changes to the contiguous test protocol, categorisation of high-risk herds, development/implementation of contract rearing Risk Management Plans (RMP's), implementation of changes to the support payments for farmers.

Taking into consideration the reports we received at the TB Forum, our on the ground experience of programme implementation, recognising the strengths and weaknesses of the tools available and critically the actions that have made a meaningful difference in the past to reducing TB levels.

Proposal

IFA propose the following enhancements to the current TB programme to bring this disease back under control and commence the journey towards eradication.

The DAFM should be aware some of these proposals will impact severely on farmers in TB breakdowns and any costs or losses associated with these experienced by farmers must be compensated for.

In addition, measures implemented in the programme that impact directly on farmers must be reviewed when progress is made in reducing TB levels.

While the focus is on addressing the TB issue in higher risk breakdowns and a targeting of resources in these areas, we must also look at areas of the programme that impose unnecessary costs and restrictions on farmers and costs on the exchequer and where possible remove these.

Enhanced TB Programme measures.

1. Government must commit to providing the resources necessary to implement an effective and efficient TB programme consistently throughout the country, this includes financial, veterinary, technical and administrative supports.
2. The Wildlife Control Programme must revert to density reduction to bring the badger population to the previously identified DAFM figure of a maximum of 0.5 badgers/sq km to reduce the potential of badger to cattle transmission.
3. Deer Management Units (DMUs) as part of the National Deer Management Strategy to reduce deer numbers must be established in all high prevalence TB areas where deer are present.
4. The DAFM must cease communications on Herd Categorisation and Risk Based Trading. This approach does not stop the movement of potentially TB infected animals, unfairly and unnecessarily devalues farmers livestock who through no fault of their own have recently exited a TB restriction. The recent figures of C10 herds who have TB breakdowns also further discredits this approach
5. The DAFM must implement density reduction of all TB susceptible wildlife in advance of any major ground disturbance works and deforestation in recognition of the recent UCD study findings which were presented to the TB Forum if we are serious about trying to stop new TB breakdowns.
6. The DAFM in consultation with farm organisations must finalise and implement contract rearing Risk Management Plans.
7. The DAFM must develop, in consultation with farm organisations, practical Risk Management Plans for all farmers to be used through the farmers own Private Veterinary Practitioner (PVP) to help drive awareness of TB risk and provide advice on appropriate precautions.
8. To address the concerns raised by the DAFM in relation to the lower sensitivity of the SCIT test and the potential for TB infected animals to remain within herds the more sensitive GIF test should be used in herds where within herd TB spread is confirmed.
9. To complement the proposal at point 8 and further reduce the likelihood of Higher Risk TB animals leaving dairy herds, a compulsory pre movement test for dairy cows entering dairy herds should be introduced. This measure when applied with point 8 significantly reduces the likelihood of TB introduction to dairy herds. The combination of using the GIF test in the original breakdown in herds, which compensates for the lower sensitivity of the SCIT test, reduces the likelihood of TB infected animals remaining in the herd and the compulsory requirement then for all cows entering dairy herds provides additional protection to the purchasing herd. The proposal focuses just on dairy cows entering dairy herds as these are the herds and the animals that proportionately have most TB when measured on Herd Incidence and APT. This measure is not appropriate or necessary for consideration in suckler herds based on their Herd Incidence and APT figures
10. The DAFM must promote the use of TB resistant bulls.

11. The DAFM must advance development of an effective cattle vaccination for TB and a suitable test to differentiate vaccinated animals from infected animals while in parallel addressing the potential market access concerns at EU and international level.
12. The DAFM must provide grant aid to farmers implementing bio security measures on farm that reduces wildlife access to critical areas.
13. Recognising the need to intensify efforts in the TB programme in high risk and larger TB breakdowns, there is also a need to balance this in breakdowns that are not high risk. Factory lesion restrictions must be shortened where it is established there is no further TB reactors on the farm. 85% of these breakdowns do not disclose any further TB reactors on the farm, maintaining a restriction for 120 days spanning two 60-day tests on these farms is unnecessary.

Outlined below are IFA 's proposals of enhancements to the TB programme and how they should be implemented in a proportionate, targeted manner that will deliver a reduction in the levels of TB and provide a proportionate level of controls on farms based on the scale of the breakdown while utilising the tools available and protecting the integrity of the approved tests used.

1. Factory lesions
    a. All suspect factory lesions must be assessed on histology or PCR tested to expedite confirmation of the TB status of the animal. It should be no more than 10 days from sampling in factory to confirmation of test result
        i. Negative results,
            - Herds derestricted immediately
        ii. Confirmed Positive results,
            - Immediate herd test to establish the situation in the herd if it is more than 4 months since the last TB test.
            - If it is less than 4 months since the last TB test, an immediate herd test should not be required but provided if requested by the herdowner
            - If the skin test at 60 days post reactor animal leaving the farm is clear, the farm should be derestricted.

This proposal shortens the TB restriction by 60 days on farms where there is clearly no TB spread from the lesion animal. 85% of positive lesion herds have no further TB reactors and the programme must recognise this and treat these herds appropriately and proportionately.

2. Low Risk TB breakdowns (Herds with less than 3 standard interpretation SCIT test reactors)
    a. The herd is derestricted following 2 clear SCIT tests at 60-day intervals from the date the last reactor left the farm.
    b. No further on farm controls.

c. The DAFM must implement a minimum of 1 badger capture and removal event within 4 months of the breakdown

3. High Risk breakdowns (Herds which have 3 or more standard interpretation SCIT test reactors and less than 10% of cows in herds of 100 cows or greater)
    a. The DAFM GIF test all reactor cohorts inside 2 weeks of the breakdown
    b. SCIT test at 60-day intervals from the date of reactor removal
    c. Derestrict the herd following 2 clear 60-day SCIT tests
    d. The DAFM implement a minimum of 2 badger capture and removal events within 4 months of the breakdown
    e. The DAFM implement a check test protocol at 6-monthly intervals for 2 years
    f. The DAFM implement a contiguous programme at 6-monthly intervals on farms in direct contact with land parcel/s where reactors were identified until the nucleus herd has a clear test
    g. High risk breakdown herds implement RMPs agreed with their PVP

This approach;

- *Recognises the weakness of the SCIT test and addresses those weaknesses with the use of the GIF test in these herds to improve the sensitivity of the testing protocol on the farm, reducing the likelihood of leaving TB infected animals in the herd.*
- *Addresses the issue of wildlife spread on the farm and to surrounding farms.*
- *Ensures risk mitigation measures are implemented on the farm to reduce the likelihood of future breakdowns*

4. In breakdowns in herds consisting of 100 cows or more where 10% of the cow herd are identified as TB reactors
    a. The DAFM GIF test all reactor cohorts inside 2 weeks of the breakdown
    b. Use the GIF test for the first 60-day post reactor removal test
    c. Use the SCIT test for the subsequent test/s required
    d. The DAFM must implement a minimum of 4 capture and removal of badger events in the 12 months following the breakdown with the first 2 capture and removal events inside 4 months of the breakdown
    e. The DAFM implement a check test protocol at 6 monthly intervals for the following 2 years
    f. The DAFM implement a contiguous programme at 6 monthly intervals on farms in direct contact with the land parcel/s where the reactors were identified until the nucleus herd has 1 clear test
    g. These breakdown herds to implement RMP agreed with their PVP

This approach;

- *Recognises the weakness of the SCIT test and addresses those weaknesses with the increased use of the GIF test in these herds to improve the sensitivity of the*

testing protocol on the farm and reduce the likelihood of leaving TB infected animals in the herd.

- *Addresses the issue of wildlife spread on the farm and to surrounding farms.*
- *Ensures the risk mitigation measures are implemented to reduce the likelihood of future breakdowns*
- *Aligns these herds with the herds that are eligible for Income Supplement, simplifying communications and remaining consistent with DAFM previous acceptance this level of breakdown warrants a different category in the programme in the compensation schemes and should also be categorised differently in the control program.*

Ends…..