

Enhanced bovine TB surveillance and controls in the High Risk and Edge Areas of England

Department of Environment, Food and Rural Affairs

Chartered Trading Standards Institute response

8th November 2016

About The Chartered Trading Standards Institute

The Chartered Trading Standards Institute (CTSI) is a professional membership association founded in 1881. It represents trading standards officers and associated personnel working in the UK and also overseas – in the business and consumer sectors as well as in local and central government.

The Institute aims to promote and protect the success of a modern vibrant economy and to safeguard the health, safety and wellbeing of citizens by empowering consumers, encouraging honest business, and targeting rogue traders.

We provide information, evidence, and policy advice to support local and national stakeholders.

We have also, as part of our recently revised remit, taken over responsibility for business advice and education concerning trading standards and consumer protection legislation. To this end, we have developed the Business Companion website (www.businesscompanion.info).

The CTSI Consumer Codes Approval Scheme was launched in 2013, superseding the OFT scheme (www.tradingstandards.uk/advice/ConsumerCodes.cfm).

CTSI is a member of the Consumer Protection Partnership, set up by central government to bring about better coordination, intelligence sharing and identification of future consumer issues within the consumer protection arena.

We run events for both the trading standards profession and a growing number of external organisations. We also provide accredited courses on regulations and enforcement.

A key concern for CTSI is that of resources. UK local authority trading standards services enforce over 250 pieces of legislation in a wide variety of areas. They have suffered an average reduction of 46% in their budgets since 2010 and staff numbers have fallen by 53% in the same period.

This response has been composed by CTSI Lead Officer for Animal Health and Welfare, Stephanie Young. Should you have any queries or wish to discuss the response please do not hesitate to contact Stephanie Young at LO LOanimalhealth@tsi.org.uk.

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Enhancing TB control measures through more sensitive testing of cattle from TB breakdown herds

Intro

The Animal Health Act 1981 places a statutory duty on Local Authorities for enforcement with this role being carried out either Trading Standards or Environmental Health officers. Effective disease control, industry compliance and proportionate enforcement with the rules is essential for economic prosperity and growth.

Questions

We welcome your views on the below proposal for the wider use of interferon gamma testing in the High Risk Area

Agree

Interferon Gamma comments:

Whilst it is appreciated that there is likely to be an increase in the number of positive tests from using the Gamma Interferon testing, it is considered that this increased use is proportionate to control the disease and will in the long term offer an economic benefit if the disease can be eradicated.

It is recommended that consideration is given to other factors that may influence the length of a herd being under restriction with bovine tuberculosis and that the regulatory role of Local Authorities for the enforcement of the disease controls is included in strategies where gamma interferon testing is used in persistent herd breakdowns.

It is recognised by CTSI that the links at a local level with AHPA offices and local authorities is not as strong as it has been in the past, and this is something that does need to be considered in any control and eradication proposals.

5 We welcome your views on increasing the sensitivity of skin testing of cattle traced from infected herds by using the 'severe' interpretation

Agree

6 We welcome your views on mitigating the risk posed by inconclusive skin test reactors (IRs)

Agree

IRs:

This policy is agreed with though consideration needs to be given to how this measure would be enforced. A key control aspect of ensuring eradication is compliance with the rules. If there is not enough weight at a local level by either AHPA staff or Local Authorities on ensuring compliance, this proposal will add very little value to the control strategy.

There needs to be sound policy in place for the notification to the LA's on the identification of these animals and how they can be identified in the herd. Suggestion would be to apply a specialist tag to the animals ears, potentially a DNA tag in order that should there be any concern over the switching of an animal's identity months or years after the IR has been found, there may be opportunity to establish noncompliance with the rules.

Consideration would need to be given as to how to identify these animals on the holding by regulators in the future, either by the Cattle Tracing System or other means.

Local Authorities must appoint as many officers as they deem necessary to enforce the provisions of the Animal Health Act 1981, however this was based upon original TB rules, not the complex landscape which the control of Bovine Tuberculosis sits in at present – as such it is a recommendation that as part of any control consideration is given to an enforcement strategy and ring fenced funding to support effective enforcement to promote and achieve compliance.

7 We welcome your views on more effective control on the movement of cattle from one TB breakdown herd to another

Agree

Effective control of TB Movements:

The key to control and eradication is compliance, where the rules are too complex, or it does not suit the producer for either business management or criminality there is no compliance and the risk is not removed.

There needs to be clarity to both the producer on what is permitted and LA's who have the duty to enforce need to be aware of such holdings and there needs to be appropriate sanctions for non compliance.

8 We welcome your views on harmonising the scheduling of Short Interval Tests in TB breakdown herds

To assist with control and eradication of the disease it is considered that there should there also be a maximum date for when the SIT needs to be concluded.

9 We welcome your views on all counties that straddle the High Risk and Edge Areas of England to be incorporated completely into the Edge Area

Agree

10 We welcome your views on the extension of 6 monthly surveillance testing (and radial testing) to additional parts of the Edge Area

Agree

11 Powers to enforce biosecurity measures to reduce reinfection risks

Agree

Powers to enforce biosecurity measures to reduce reinfection risks:

It is agreed that effective bio-security should be included in the disease control measures similar to any other notifiable disease.

12 Limiting approval of slaughter sales ('red markets') of TB-restricted cattle to the HRA and Edge Area

Agree

Limiting approval of Red Markets:

It is agreed this is proportionate to disease control. Steps need to be taken to ensure that there are sufficient checks in place to ensure compliance with this.

13 Sharing TB breakdown information – ibTB

Agree

ibTB:

It is agreed that ibTB should be developed further as this is a useful tool for industry and regulators alike. Consideration should also be given to the need for shared intelligence and information on disease with local authorities who have responsibility for enforcement of the TB rules.

Local Government typically operates using the Intelligence Operating Model where which looks at the threats and work is tasked accordingly. With limited intelligence with regards Animal Health, particularly bovine TB, this is an area of work that needs to be strengthened. As a minimum it is suggested there should be read only access to SAM. In an ideal world there would be a platform where LA's have access to the disease control information held by APHA and also have opportunity to add to this information to assist all regulators.

At the present moment in time the enforcement of ibTB is information is sporadic and often the regulators don't have the full picture of the disease breakdown or other influencing factors which may impact on the eradication of the disease. Typically it is working in Silo's.

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