

**Bovine TB: a call for views on potential  
improvement and simplification of the TB testing  
regime in the High Risk Area of England**

**Department of Environment, Food and Rural Affairs**

**Chartered Trading Standards Institute response**

**8<sup>th</sup> 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](http://www.businesscompanion.info) ).

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

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***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.***  
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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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## **Bovine TB: a call for views on potential improvement and simplification of the TB testing regime in the High Risk Area of England**

### **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.

### **Response**

We agree with the proposals within this consultation, however, emphasis must be placed on ensuring compliance with the rules. Where a producer can demonstrate compliance then earned recognition ought to be given, without compliance the strategy for GB will not be achieved.

There needs to be effective liaison at a local level between regulators (APHA and LA), industry and vets to promote and seek compliance.

With the increased flexibility for businesses to be able better plan their testing every 90 days consideration does need to be given to minimising larger herds having their test split over multiple days thus extending the testing window. At a local level, consideration needs to be given to the veterinary risk assessment to ensure this is as robust as possible.

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