



**BCVA Policy Statement**  
**Bovine tuberculosis**

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## **Executive Summary**

The farming industry and veterinary profession share a unique experience in battling Bovine tuberculosis (bTB), working alongside one another on disease control, management, and effective prevention. The role of the private farm vet is crucial, and in updating its bTB policy, Board members of the British Cattle Veterinary Association have drawn on their experience and expertise, seeking to establish a balanced, evidence-based foundation on which to build. Emphasis on the role of the private veterinary surgeon (PVS) forms the foundation and basis of this review.

### **Policy Development**

In 2014 the UK government outlined a 25-year eradication strategy that set the ambition to secure officially bTB free status for England by 2038. This was refocused after the Godfray Report in 2018, which in turn resulted in Defra's five-year plan published in 2020. BCVA's latest policy review was conceived in response to that Defra 2020 document and has been in development during the inevitable disruption of the Covid pandemic. With expanding research, ongoing trials, and continued government reviews, BCVA has sought to create a substantial groundwork that is able to accommodate new evidence and guidelines in subsequent updates.

### **Seven Policy Pillars**

BCVA's updated position outlines seven key policy areas that demonstrate a comprehensive, holistic approach to the management and control of bTB: The role of Private Veterinary Surgeons, Governance and Regulatory Reform, Cattle Vaccination, Surveillance and Testing, Delivery of Testing, Biosecurity, Cattle Movement, and Training.

These policy points bring together strategies and stakeholders, with the assertion that it is only by combining our tools, resources, and skills that we can hope to gain control of the disease and ease the economic and emotional burden that accompanies bTB infection.

### **Hope and Actions**

This document contains actions and proposals, including BCVA accreditation for specially trained PVS to advise on standards, lobbying for an independent regulator for farming and land management, and a call for governance of the disease to take place at a local level.

The association will continue to press for the role of the PVS to move away from solely testing for disease to that of testing alongside active involvement in the delivery of on-farm advice for TB control. We will continue to work with government on improving communication between APHA, the PVS and farmers.

We will also call for recognition that engagement obstacles exist for both farmers and the veterinary community, and for Defra to develop a new approach that embraces behavioural

science research to better understand both the barriers and the best approaches to generate greater engagement.

With regards to research, BCVA welcomes government support for studies exploring bTB vaccines and diagnostics, biosecurity, wildlife, and socioeconomics. In promoting a variety of areas of research, the association recognises that it on its own is inadequate if there is not also an increased flexibility for recommended control measures on farm, in-order to be able to adapt as new research findings emerge.

BCVA is largely supportive of the current approach to cattle movements and will work with and respond to the Government's proposal to require owners of herds under bTB restrictions for over eighteen months (persistent breakdown herds) to have a specific bTB herd health plan in place. BCVA eagerly anticipates the introduction of the Livestock Information Programme (LIS) and will monitor how the information this is able to carry will assist in ongoing bTB risk management.

We have been calling on the government for many years for the provision of training to enable the PVS to build specialist bTB knowledge and obtain accreditation. Defra's recommendation of training in response to this is therefore particularly embraced by BCVA. The association will launch veterinary training for the CHECS TB Entry Level Membership alongside the publication of this policy statement.

Bovine tuberculosis is an infectious disease with risk pathways that can be reduced using greater understanding, clinical freedom for farm vets, engagement with farmers and effective herd management. BCVA are clear that to control this devastating disease an active partnership between the farmer and their PVS is essential, and this should be supported by Government policy.

## **Acknowledgements**

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## Introduction

This paper sets out the British Cattle Veterinary Association (BCVA)<sup>1</sup> policy approach on Bovine tuberculosis (bTB).

The paper was written in response to Defra's publication in March 2020 of its five-year plan that described bTB as, 'one of the most pressing animal health problems in England' (Defra, 2020, p. 9) BCVA welcomes much of Defra's plan, however it is concerned there are continuing areas of policy ambiguity despite the new approach, and potentially new and unexplored policy areas that need to be assessed in terms of the impact on Private Veterinarian Surgeons (PVS).

## Background

The Godfray Review of the Government's approach to bTB was published in October 2018. It concluded that bTB incidence in England is '*at best roughly stable*' and that '*this cannot be allowed to continue*'. It makes clear that there are '*no easy answers to reducing disease levels*' and what is required is '*new drive and a concerted and concentrated effort by all sectors involved*' CITATION Def20 \p 18 \l 1033 (Defra, 2020, p. 18).

Godfray's findings included:

- Industry must take greater responsibility for on-farm controls, biosecurity and safe trading practices to stop the disease spreading.
- More can be done to help farmers make informed purchasing decisions reflecting the risks of cattle being infected.
- There is a strong argument for targeted deployment of more sensitive diagnostic tests or test combinations to root out bTB-infected animals.
- Evidence shows that badgers do transmit bTB to cattle and contribute to the persistence of the disease.
- Disease reduction would benefit from greater flexibility and agility in adapting bTB control measures as new research findings emerge.

In June 2019 BCVA formulated the association's position on bTB in response to the Godfray Review. Made up of seven key areas, the paper focused on governance, testing and management, managing TB on farm, delivery of testing, biosecurity, risk-based trading and training.

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<sup>1</sup> The British Cattle Veterinary Association represents vets principally working with livestock. Most of our members are in farm and mixed practice throughout the UK, and we also represent those working in industry and academia. We provide, support, advice and education, working alongside our colleagues across the wider veterinary profession. We wish to see a central role for the vet to safeguard and improve the wellbeing of cattle and safety of our food within sustainable beef and dairy industries.

In March 2020, Defra published its five-year plan in response to the Godfray Review. BCVA broadly welcomed the Government's 'pragmatic response' (BCVA, 2020) and its multiple approaches to the disease. The Government strategy was summarised by Defra as:

- Acceleration of work to develop a deployable cattle bTB vaccine, as part of a wider programme of bTB research.
- Evolving the strategy for preventing spread of TB from wildlife.
- Improving diagnostics, surveillance and epidemiology, to root out the disease.
- Incentivising industry behaviours to prevent the spread of bTB through increased uptake of effective biosecurity measures and management of the risks posed by cattle movements.
- Creating a true partnership across government, industry and stakeholders through more transparent governance structures at every level which would allow more effective communication (Defra, 2020, pp. 9-10).

A significant number of points that BCVA campaigned for on behalf of its members have been recognised by Defra. These recommendations included cattle vaccination, validating a Differentiating Infected from Vaccinated Animals (DIVA) test, the use of the most appropriate test available and a more flexible, bespoke and evidence-based approach to the scenario of regular testing and removal of infected animals.

BCVA also advocated for the need to review the system to motivate change – to recognise and reward good practice, the roll-out of a CHECS TB Entry Level Membership, the requirement for more research, and greater acknowledgement and inclusion of the private veterinary surgeon. The recognition by Defra of the need for these policy changes is appreciated by BCVA.

Building on the themes of BCVA's 2019 initial position statement, the focus here is on the impact that both the Godfray Report and Defra's recommendations will have on the future work of BCVA members. The BCVA position on badger culling and badger vaccination is not highlighted in the report as it maintains the position that to effectively manage bTB in cattle, we must also manage disease in the wildlife and the environment. As such, BCVA acknowledges the Government's exit strategy from intensive culling of badgers, whilst ensuring that wildlife control definitely remains a tool that can be deployed where the epidemiological evidence supports it.

BCVA also accepts the Government's intention to pilot badger vaccination in at least one area where the four-year cull cycle has concluded, provided there is simultaneous surveillance of disease and data collection to review vaccine efficacy (Defra, 2020, p. 11).

## Policy 1: The Role of Private Veterinary Surgeons

BCVA continue to advocate that delivering greater clinical freedom to private vets and operational choices to farmers has the capacity to improve disease control, build resilience into the national herd and re-engage the farming population in the broader issue of bTB control.

Defra repeatedly state in their plan that the Government sees a bigger role for private vets. They state, *'Private vets are fundamental to bTB eradication, particularly through their pivotal role in the statutory bTB surveillance programme. There is scope to build on this and the government is committed to empowering private vets to help their clients eradicate bTB from their herds in the same way as they do for other endemic diseases e.g., BVD, IBR, Johne's and leptospirosis. This role could include providing expert, bespoke advice and supporting vets and farmers to make informed decisions about the private use of supplementary tests, alongside statutory testing, to accelerate disease eradication at herd level.'* CITATION Def20 \p 47 \l 1033 (Defra, 2020, p. 47).

BCVA would agree that PVS are responsible for diagnosing, managing, preventing, and eradicating many different diseases and there is no reason why the same approach cannot be applied for bTB. Applying these roles to bTB management and control will, however, require a change of mindset for some PVS who have fallen into the trap of purely being the identifier of disease rather than part of the solution. The emotional burden of disclosing bTB on farm should not be underestimated for either the PVS or farmer.

This additional challenge adds to the sense of despondency towards bTB control that is felt widely across the industry. The PVS is rarely part of the conversation towards a solution with APHA and the farmer, following a disclosure of reactors or inconclusive reactors. The PVS will have a unique understanding of the current risks and challenges on farm which is likely to aid these discussions and potentially lead to an earlier resolution of the bTB breakdown. For these reasons the PVS should be involved in discussions and data sharing surrounding bTB breakdowns.

BCVA is concerned there are continuing areas of policy ambiguity, and potentially new policy areas that need to be assessed in terms of the impact on PVS. The risk of greater disengagement of PVS in relation to bTB has not been fully addressed by Defra – as identified by Godfray - and still needs to be assessed.

The provision of appropriate training for private vets and the approval of BCVA bTB Accredited Vets (BATVAs) to provide bespoke on farm advice and control programs is key to the facilitation of improved disease control at a farm level. PVS will benefit from an increased confidence in their approach to prevention and management of bTB on farm. BCVA welcomes Defra's recommendation on this, looking forward to working in partnership in the development of training and roll-out of accredited veterinary advisors.

**BCVA will monitor and review:**

- The new programme of increased herd surveillance and the new 6 monthly cattle testing regimes in the HRA's as from 2021.
- The Government vision of a bigger role for PVS by delivering bespoke bTB management plans and advice to their clients.
- The Government proposal requiring owners of persistently affected herds to have a private veterinary herd health plan for bTB.

**BCVA will continue to lobby for an increased role of private vets and greater access to information for them to enable them to undertake their work:**

- Private vets who wish to engage further with disease breakdowns on a client's farms will need the clinical freedom to utilise APHA veterinary epidemiological information to apply high risk herd management controls.
- For BCVA bTB Accredited Vets (BATVAs) to advise on CHECs entry level requirements for farms.
- The results of statutory testing of bTB need to be communicated to a farm's private vet and not just the farmer.
- To enable the smooth transition of information between APHA case vet and the farmers private vet, amendments are needed to the notifiable diseases legislation in order to access materials and samples from infected farms in order to develop and validate new diagnostic tests.

BCVA are clear that to control this disease, as with any other disease of livestock, a partnership between the farmer and their PVS must exist, and this should be supported by Government policy.



## Policy 2: Governance

In terms of governance and regulatory reform, we note that Defra has chosen not to take up Godfray's recommendation that a new independent body on disease control would be 'helpful' to take over disease control operations from the Animal and Plant Health Agency (APHA), Natural England and Local Authorities.

Godfray's recommendation also had synergy with the findings of Dame Glenys Stacey's independent Farm Inspection and Regulation Review, which was published in December 2018. She recommended the creation of a new independent regulator for farming and land management.

In response to Godfray and Stacey, according to Defra, '*Work is underway to explore the option of a broad-based independent regulator, alongside other possible approaches, in response to Dame Glenys' review*' (Defra, 2020, p. 77) . In the meantime, however, they are clear that APHA is the lead body on bTB and the Government has developed proposals to strengthen the governance arrangements for bTB. They also state, '*to encourage stronger relationships between farmers, private and APHA vets and wildlife and conservation groups, without disturbing other established local or regional representative groups (e.g., NFU county groups) we will develop a new dedicated 'taskforce' within Defra's wider TB policy team*' (Defra, 2020, p. 71).

### **BCVA will:**

- Support the newly established Bovine TB partnership and retain their membership on this Board.
- Explore, in partnership with other stakeholders, the potential extension of the role of local TBEG groups to include additional endemic disease issues in England.
- Lobby to enable LIS to carry information for BCVA bTB Accredited Vets (BATVAs) to apply on farm testing and control programmes.
- Lobby for the enablement of BATVAs to have a 'pre-approval' role to check suitability for AFUs, BRUs and additional units as they arise in the future. This would involve biosecurity checks and risk plans pre-application as well as the sharing of reasons for failures in the application for these units to allow the PVS to assist farmers becoming more responsible and successful in their future applications.

## **Policy 3: Cattle Vaccinations, Surveillance and Testing**

### **Cattle vaccination**

BCVA calls on Defra to invest the appropriate short and long-term funding to bring cattle vaccine to market without delay or detriment to other parts of policy, such as the gamma testing budget. The use of the vaccine within the bTB strategy will only be successful if an appropriate plan for deployment and use is constructed using a sound evidence base and epidemiology. The vaccine provides another tool with which to tackle bTB, but it should not be seen as a silver bullet.

It is likely that severity of disease could be reduced but further research is required to assess if infection will be prevented and to what extent. It will be necessary to undertake a thorough cost benefit analysis to assess how vaccine deployment will result in the greatest benefit to all. It has yet to be ascertained whether it will be more appropriate to roll out in the LRA to prevent infection establishing in bTB free areas, or would it be of greater value to vaccinate herds with persistent breakdowns, as part of a management tool.

BCVA would like to see a financial incentivisation system in place, where subsidised vaccine is available or prioritised to farmers who are already implementing reduced risk behaviours, such as CHECS TB Entry Level Membership or practising risk-based trading. It must be ensured that accessibility and availability do not become barriers to effective utilisation. BCVA look forward to the field trial results and planned licensing of the DIVA test over the next five years.

### **Six-monthly surveillance**

Defra has stated that in order to enable the earlier detection of infected herds and help accelerate eradication of bTB in endemic areas, the government would replace annual surveillance testing of cattle herds with six-monthly surveillance testing in parts of the HRA in 2020. The government expects to extend this policy to the whole of the HRA during 2021. Lower risk herds in the HRA that meet certain defined criteria for 'earned recognition' will continue to be tested at annual intervals (Defra, 2020, p. 43). BCVA is in broad agreement with this strategy as part of a combined approach to eradication.

### **Increased utilisation of more sensitive tests (or test combinations) for surveillance of OTF**

BCVA has consistently argued over many years that to enable sensible and informed decisions about permitted cattle movements, a broader understanding of the individual cow, herd and parish history alongside more sensitive testing, needs to replace the current approach of using the single intradermal comparative cervical tuberculin test (SICCT) as the best measure of a risk base.

Consequently, BCVA welcomes the government statement that they will support the deployment of more frequent and more diverse cattle testing to enable the detection of the presence of bTB earlier and more rapidly remove it from cattle herds (Defra, 2020, p. 23).

The Defra report states:

- The government will look to further improve surveillance testing through the increased use of more sensitive tests (or test combinations) for surveillance of OTF herds, taking into account the herd's bTB risk, and subject to a favourable cost/benefit analysis.
- APHA is modelling the impacts of this suggestion in terms of the number of additional herds restricted and cattle compulsorily slaughtered.
- The current tuberculin skin test will remain the '*focus of our surveillance testing in the short to medium-term*' although the government sees the development of new diagnostic tests for bTB in cattle as a priority' (Defra, 2020, p. 43.48).

BCVA supports this approach. It does not suggest that the SICCT be removed from the testing protocol, or even that it is superseded as an initial screening test for statutory surveillance, but simply applied more appropriately and alongside further testing protocols.

The current approach to the use of non-Defra approved tests is, however, extremely restrictive. BCVA supports a more nuanced approach to the use of alternative tests. This approach would potentially be different in the LRA and HRA. For example, in the LRA a more sensitive test for post-movement testing would be sensible and help identify individual animals who may be 'risky' before they have spent time in the herd.

Cattle testing positive to an IDEXX ELISA or Enferplex test should be retained without OTF status being impacted, in the same way that resolved IRs are allowed to remain within a herd. This would encourage further uptake of these tests, which would reveal currently undisclosed infections, without being financially crippling to farmers. This in turn would allow these animals to be managed effectively to prevent spread of infection (they could not be sold on other than to slaughter) and enable further research into future outcomes, that could indicate at what stage they are at risk of shedding *Mycobacterium bovis*.

**BCVA will:**

- Lobby for the SICCT to be applied more appropriately and alongside an increase in the availability of accredited tests, to be used at the clinician's discretion, and at the farmer's cost but with commensurate responses to the results.

- Encourage BATVAs, or other appropriately trained vets, to undertake further and additional testing on the basis that extra training and clarity is provided to ensure a full understanding of the modality of tests available, their applications and interpretations.
- Lobby for decisions to be taken by local TBEG groups alongside APHA to step above the national testing policy when the local situation demands it and taking governance of the disease to a more local level.
- Produce, for BCVA members, a dynamic list of testing options which would be interpreted and delivered by BATVAs or other trained vets to allow well informed decisions on when and where to use alternative tests.
- Engender an environment where research into new disease management tools is encouraged, and that we work to enable their use for different on farm scenarios and communicate this out to members.
- Lobby for evidence of reduced recurrence rates of bTB on farms where a third SICCT or premovement test is imposed prior to movements being permitted. Lobby for the option of this being applicable to assessed 'high risk' farms rather than a blanket approach to all.

## **Policy 4: Delivery of Testing**

BCVA has consistently insisted that it would be a missed opportunity in attempts to manage bTB to continue the separation of testing and control. The veterinary led team of private vets, official vets and approved testers is integral to achieving the testing programme for bTB. BCVA suggests that the emphasis for PVS must move from solely testing to that of testing along with active involvement in the delivery of on-farm advice for TB control. There is precedence for this in the Johnes and BVD programmes in cattle, as well as high health programs including real welfare programmes in pigs.

## **Policy 5: Biosecurity**

BCVA appreciates that the government now accepts that those herd owners who take steps to improve a herd's resilience to bTB should be recognised and rewarded.

BCVA agree with the government that having basic on-farm biosecurity controls in place should be a future requirement and welcomes the government plans to introduce the CHECS TB Entry Level Membership. This model is based on 'no regrets' measures which should provide an affordable, achievable baseline standard for all.

These measures are based on the available science and evidence regarding *Mycobacterium bovis* in the environment and potential infection risks. It potentially will have the added benefit of preventing other diseases heightened by improved biosecurity.

Full CHECS TB accreditation requires further compliance with measures to reduce risk (including post-movement testing) which will then yield further recognition for reduction of risk (annual surveillance testing for those in a six-month testing area). BCVA understands that the industry-led, not-for-profit, CHECS standards body will verify compliance.

The Godfray Review highlights the importance of making sure that farmers receive the best advice from trusted sources. BCVA acknowledge that Defra considers the veterinary profession and farm advisory service providers are well placed to provide information to herd owners on bespoke resilience measures to reduce their risks of bTB, but not without support from government to ensure quality assured advice is accessible. CITATION Def20 \p 60 \l 1033 (Defra, 2020, p. 60).

TBAS should be applauded for its continued work, yet there remains a need to recognise that engagement obstacles do still exist between farmers, the veterinary community and TBAS. There is an ongoing need to increase farmers' buy-in to the concept of biosecurity as a risk reduction tool. Defra itself acknowledges, '*few herd owners are acting on that information, advice and guidance*'.

BCVA advocates the need for Defra to undertake a new approach, including behavioural science research, to better understand both the barriers and the best approaches to generate behaviour and attitudinal change. Further research to understand the effect of different biosecurity interventions and the economic gains of these measures is also recommended.

### **Research**

BCVA welcomes government support for a substantial program of research on bTB vaccines and diagnostics, biosecurity, wildlife, and socioeconomics. The government's primary bTB research goal is to develop a deployable cattle bTB vaccine within the next five years. The government recognises that it needs to increase the output of its research programme as part of the solution to achieving its target of OTF status for England by 2038. CITATION Def20 \p "22, 23, 27" \l 1033 (Defra, 2020, pp. 22, 23, 27).

BCVA would encourage more research into testing modalities and immunity to bTB in order to better understand which animals are higher risk (of shedding etc.). As wildlife control moves from badger culling potentially towards badger vaccination BCVA would welcome research into the effectiveness of badger vaccination at preventing cattle infection and research into more targeted badger control, for example at sett level where infection is present. We would also strongly advocate the implementation and appropriate usage of novel testing technologies which achieve World Organisation for Animal Health accreditation.

### **BCVA will promote further field research in identifying:**

- High risk animals.
- Biosecurity measures with a proven ability to help reduce risk.
- Different testing regimes in differing disease conditions.
- Biocontainment of disease.
- Genomics.
- Behavioural changes for vets and farmers.
- Wildlife control.

Further research on its own is inadequate if there is not an increased flexibility for recommended control measures on farm to adapt as new research findings emerge. Brexit may allow the opportunity to enable regulation or legislation changes to enhance flexibility in control measures and this should be seized where possible.

## **Policy 6: Cattle Movement**

BCVA agrees with Defra that cattle movements are a necessary consequence of the structures of England's beef and dairy sectors. They also agree that bTB controls need to be tailored to the needs of those sectors, forced change should be avoided, but in return herd owners must take greater responsibility for managing the risks of translocating disease.

The Godfray Review refers to a disappointingly low uptake of relatively cheap 'no regrets' biosecurity options by farmers, but also highlights that the diversity of cattle farming businesses, including their locations and landscapes, means accessibility to appropriate, relevant, tailored advice is a barrier for many herd owners (Defra, 2020, p. 54). BCVA is confident that the development and relaunch of the TB Hub website has allowed for significantly better access to advice.

Defra state that managing and reducing the risk of bTB through movements of cattle between herds is a part of good biosecurity and an area over which farmers have the most control. BCVA agrees with this statement and believes that much more could be done to aid the decision making of those at risk of bringing undetected infection into their herds. Whilst ultimate accountability for responsible cattle movements lies with the cattle owner, the role of the PVS is instrumental in engaging and educating industry with regards to best practice.

BCVA and Defra agree responsible cattle movements (formerly known as risk-based trading) undoubtedly fall partly on herd owners to share information to mitigate the risk of disease transmission, but also on government to regulate such movements, where necessary, and ensure the sharing of important risk-reducing information.

The government's view is that information necessary for mitigating those risks needs to be made available as a matter of course. That may mean requiring, not just encouraging, relevant testing and health information to be communicated when cattle are offered for sale (Defra, 2020, p. 62).

BCVA eagerly anticipates the introduction of the new Livestock Information Programme (LIS) and will monitor how the information this can carry will assist in ongoing bTB risk management.

### **The BCVA will:**

- Work with and respond to the Government's proposal and consultation on requiring owners of herds under bTB restrictions for over eighteen months (persistent breakdown herds) to have a specific bTB herd health plan in place (developed by their trained PVS). Movements of cattle into these herds would not be permitted if there was not an approved health plan in place. The details will be developed in partnership with veterinary and farming industry representatives (Defra, 2020, p. 65) .

## **Policy 7: Training**

BCVA welcomes Defra's acknowledgment that many herd owners rely heavily on their local veterinary practices to guide them through their options for increasing their resilience to bTB. The association also welcomes the understanding that it is wrong to assume that all PVSs have the confidence and expertise to give good advice on bTB. BCVA has been calling on the government for many years for the provision of training to enable PVSs to build specialist bTB knowledge and obtain accreditation to acknowledge their expertise and role. Defra's recommendation of training in response to this is therefore particularly welcomed by BCVA.

### **BCVA will:**

- Work with APHA to develop options for the provision of new bTB training to their members and accreditation of BATVAs. BCVA is ideally placed to initiate and deliver this training over the whole of the UK to both members and non-members and will launch a training programme in June 2021.
- Promote engagement with the CHECS TB Entry Level Membership and training programme at all levels of the veterinary profession.
- Lobby RCVS to include basic understanding of the CHECS TB Entry Level Membership and training programme in basic Professional Development Phase programmes.



## Conclusion

BCVA appreciates that there is some degree of consistency in the policy messages produced across government, industry and stakeholders as to what it will take to manage, reduce and ultimately eradicate bTB.

The role of the private veterinary surgeon in tackling this disease is discussed widely in this document and BCVA is ideally positioned to understand the importance of this approach. On a daily basis PVS are responsible for diagnosing, managing, preventing, educating and eradicating many different diseases and there is no reason why the same approach cannot be applied for bTB.

It is recognised that a degree of fatalism towards bTB control exists amongst some in the veterinary profession, which will require a change perspective to re-engage with the potential to control and manage this devastating disease. TBAS has certainly helped to convince many PVS that they can make a very real difference by advising modifications to biosecurity on farm and BCVA is convinced that training will inspire PVS with the confidence and skills to tackle bTB. It is crucial that the private vet is part of the solution to bTB control, rather than just an identifier of disease through testing.

The emotional and psychological burden of disclosing bTB on farm should not be underestimated – for either the PVS or farmer. The additional challenge that this provides often adds to the sense of despondency that is felt within industry. This in turn leads to a degree of disengagement with the disease, partly due to the PVS feeling ineffectual with respect to control and management of the disease on that farm.

A behavioural trend exists that once reactors or inconclusive reactors are disclosed on a holding, the role of the PVS is complete and APHA vets will take control. This should be strongly discouraged, and it is in fact vital that the PVS continues to be utilised and informed post bTB test, in their role as trusted advisor on these units. The PVS will have a unique understanding of the current risks and challenges on farm and should be incorporated into any discussions and information sharing with APHA and the farm to enhance the possibility of clearing a breakdown. Communication is a powerful tool that should not be undervalued. BCVA expects Defra to now implement the changes to which they have asserted they are committed to – empowering the role of the private veterinary surgeon.

There is still much to learn about the transmission and control of bTB. BCVA anticipates an environment where research into new disease management tools is encouraged and invested in. This would include, but not be limited to, research into biosecurity enhancements, testing modalities, wildlife control and vaccination protocols to acquire and inform best practice. Once research can inform control measures there needs to be increased flexibility for these measures to be implemented as policy without delay.

The association is also keen to promote the increased utilisation of more sensitive tests for bTB detection. Whilst these are available, they are not currently being used to their full potential. These tests would be a valuable tool against bTB if deployed in a targeted fashion and interpreted in an informed and appropriate manner. To realise maximum gains from additional test use, we will need to adapt our approach to using them. It may be appropriate that antibody positive animals are monitored and managed rather than removed immediately from the herd. More sensitive tests could in future become the 'normal' in circumstances where the aim is to prevent infection entering low risk areas (for example, in post-movement testing).

BCVA fully recognises that bTB control and eradication will always be one of the biggest challenges we face. However, there is much to feel optimistic about and we have many opportunities to increase our involvement, with much to gain. BCVA has previously campaigned on behalf of its members for action with regards to cattle vaccination, validating a DIVA test, the roll-out of the CHECS TB Entry Level Membership. We hope that other calls within this policy are heeded. BCVA is determined to help drive a concerted and concentrated effort by all sectors to reduce disease levels.

<ENDS>

## Glossary of Terms

APHA	Animal and Plant Health Agency
ATT	Approved Tuberculin Testers
BATVA	BCVA Accredited TB Veterinary Advisor
BCVA	British Cattle Veterinary Association
bTB	Bovine tuberculosis or <i>Mycobacterium bovis</i>
BVD	Bovine Viral Diarrhoea
CHECS	Cattle Health Certifications Standards
DEFRA	Department for Environment, Food and Rural Affairs
DIVA	Differentiating Infected from Vaccinated Animals
HRA	High Risk Area
IBR	Infectious Bovine Rhinotracheitis
IRs	Inconclusive Reactors
LRA	Low Risk Area
NFU	National Farmers' Union
OTF	Official Tuberculosis Free
OV	Official Veterinarian
PVS	Private Veterinary Surgeon
SICCT	Single Intradermal Comparative Cervical Tuberculin
TBAS	TB Advisory Service
TBEG	Bovine TB Eradication Group for England

## References

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Defra, 2020. *Next steps for the strategy for achieving bovine tuberculosis free status for England. The government's response to the strategy review, 2018*