



ICSA Presentation to the Joint Committee on Agriculture & the Marine

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Introduction

ICSA would like to thank the chairman and committee for the invitation to appear on the topic of bovine TB eradication.

The invitation is timely as it coincides with the launch of the Bovine TB Eradication Strategy 2021-2030. This plan has been published following a process of debate at the TB Forum which has been in place for over two years now.

While the final document is the result of a lot of deliberation, disagreement and compromise, it is clear that there remains a gulf in viewpoint when it comes to the objective of TB eradication between the Department (DAFM) and farm representatives.

Ultimately, ICSA believes that a comprehensive agreement that fairly accommodates both the Department proposals and the critical need to ensure fair play for all farmers is the only way forward. A sound strategy must be based on fair play for all farmers and a recognition that full and accurate compensation is the essential foundation of success. Academic research is important, but we are talking about the livelihoods of our members here and the TB Forum must proceed on the basis that a minority of farmers are expected to carry unfair costs.

ICSA welcomes the setting up of three working groups to augment the work of the actual TB Forum. In particular, we hope that the setting up of a Finance Working Group and an Implementation Working Group will add impetus to the process.

In an overall context, we would suggest that the key intractable problems are as follows:

- An ongoing concern that the diagnostic tests are not satisfactory, partly linked to the reality that many reactors do not kill out with lesions. While the lack of lesions does not prove that there was no TB, nonetheless, the culling of otherwise healthy animals is a very sensitive topic for farmers. Whereas the Department will argue that the skin test has been used in countries that have successfully overcome TB, the Irish experience over many years has been that the skin test has not delivered TB eradication. We understand the difficulty with the Gamma Interferon test which – while having a role in the case of serious breakdowns – gives too many false positives and therefore could not be used across the board for all herd tests. ICSA suggests that emerging technologies need to be fairly evaluated and an open mind kept.
- The difficult issue of financing the programme and the fundamental principle that – if we are all in this together – a farmer must get 100% and no more compensation as a result of any policy linked to the eradication programme. This applies to the valuation of reactors but is also a reason why the issue of herd categorisation is so sensitive. We cannot progress if the consequence of policy decisions is to decimate the value of a farmer's stock.
- The cost of the programme is put at almost €100 million. The 2020 state contribution is €57 million, farmers pay €35 million and the EU contribution is now down to €4 million. Testing costs €35 million, compensation costs €21 million, the wildlife programme costs €4.6 million and research €2.2 million. However, in addition, DAFM puts its costs at €34 million up from €26 million a few years ago. ICSA has repeatedly asked for a breakdown of the DAFM spend and we are still waiting for it. We had hoped that it would be available at last week's Finance Working Group where we had expected the Grant Thornton Cost Benefit Analysis. Unfortunately that report is delayed. ICSA questions whether the DAFM costs are all directly attributable to the TB programme or whether some of these staff costs would continue in the

event that TB disappeared over night. So this becomes a question of relevant costing. It should also be pointed out that ICSA was the first farm organisation to estimate the cost of farmers' time and labour which does not get included in these figures at a conservative €12.5 million per annum.

- This leads to the contentious issue of on-farm market valuation. ICSA believes that the independent valuers need to be allowed to do their job without undue interference. We also are arguing that certain breeding stock are unfairly treated due to ceilings on values.
- Wildlife is a key issue. Badger culling will have to remain central and we would like to see more testing of badgers particularly in the context of plans to vaccinate. Vaccination is not a substitute for culling in black spots. The role of deer in some areas is, in our view, an inescapable problem but there has been a hands-off approach from DAFM which is inexplicable.
- While there has been some commentary on the increase in reactor numbers in 2020, it is important to keep this in context. We have a rapidly increasing dairy sector and the establishment of new herds along with the increased intensification linked to the ending of quotas cannot have been expected to have had no impact on TB figures. However, the state is a significant beneficiary from increased exports, tax receipts and economic activity in rural areas and this expansion is in keeping with successive agri-food strategies. It is therefore to be expected that there would be some increase in TB costs but they are more than adequately mitigated from an exchequer point of view by the expansion.
- Farmers must be treated with respect and understanding in the context of the trauma of TB outbreaks and they need to be properly communicated with by all DAFM officers and vets.

The following section is the ICSA contribution to the strategic actions set out on pages 17-24 of the Bovine TB Eradication Strategy 2021-2030.

Preventing spread from herds with a high risk of recurrence

Enhanced actions to clear infection from extended breakdown herds.

These relate to recommendation number 6 which is "increased focus on herds which require enhanced support due to their disease history".

ICSA agrees that there is a need for enhanced support for herds that have had a long and difficult TB experience. However, the term "enhanced support" is not analogous with provisions such as imposing a 30 day pre-movement test.

However, ICSA would consider discussing a pre-movement test of 60 days limited to very specific cases of herds that have had severe and recurring TB outbreaks, provided that there is a satisfactory conclusion to the outstanding questions relating to compensation and a commitment to fully confront the role of wildlife. In particular, ICSA wants to see an end to the half-hearted engagement with the deer problem, especially having regard to research (UCD/DAFM) confirming the link between bovine TB and TB in deer in Wicklow. ICSA has strongly maintained that the strategy for TB cannot be agreed unless there is a much more robust approach than that which pertains at present.

ICSA is not satisfied that DAFM can continue to assume that failure to research TB in deer on a more widespread basis across other counties is evidence that there is "nothing to see here". Equally, the DAFM approach of saying it's up to farmers to seek licences to shoot deer is completely at odds with

the objective of eliminating TB. It is not fair nor reasonable to berate farmers for avoiding hard choices when the deer problem provides a clear example of DAFM looking to take the soft option.

In addition, the refusal of Coillte to properly fence its lands to ensure deer do not encroach on adjoining farmland is unacceptable. A TB strategy which is built around providing the state with strong powers to impose restrictions and even penalties on farmers should ensure that Coillte is not allowed to be a bad neighbour. Farmers are particularly incensed at the long history of portraying them as the problem, encapsulated by the contentious advert from the 1980s – “the neighbour who doesn’t give a damn; know him for what he is.” Unfortunately the neighbour who doesn’t give a damn in 2020 is an agency under the aegis of DAFM.

Other proposals under this section include a detailed investigation to identify and remove all sources of infection; the use of additional targeted tests to identify infected animals and progressive removal of animals deemed to be higher risk.

ICSA accepts that these proposals have merit. There is evidently a need to use other testing methods in addition to the skin test due to its imperfections and it is logical that this should be utilised in problem herds. ICSA believes that DAFM should be open to trialling new methods of TB detection in addition to the use of the gamma interferon blood (GIF) test.

ICSA also wants the views of a herd owner - who believes that whole-herd de-population is necessary - to be accepted in most cases, where the TB breakdown is proving intractable.

ICSA is very concerned about proposals to align compensation with undertaking risk mitigation measures and this needs further debate before any attempt to implement it.

Addressing the risk from inconclusive animals (TB Forum Recommendation 9)

ICSA accepts that GIF testing inconclusives or allowing the farmer to choose to cull such animals is appropriate. However, there it is also necessary to accept that an animal which was an inconclusive several years ago and which has subsequently passed more than one annual skin test and the GIF should then be discounted as a risk in the case of herds which are otherwise TB free.

Action plans for areas with increased localised TB levels (TB Forum Recommendations 3 and 12)

ICSA accepts the need for specific action plans for areas with localised TB outbreaks. Again, the need to tackle all wildlife factors including deer must be part of this. Whereas contiguous testing is often unpopular, there is a need to examine in greater detail the specific circumstances of contiguous herds. For example, is the TB outbreak linked to the arrival of cattle on rented land from a herd located a significant distance away? What about the case of feedlots which are contiguous? Should there be more stringent restrictions in such cases?

Aligning with changes in the EU Animal Health Law TB Regulations

This imposes a considerable new burden of cost and inconvenience on farmers, arising from the pre-movement test for animals/ herds not tested in the previous six months. ICSA disagrees with the necessity of this but it will be interesting to examine what it achieves. If the hypothesis is correct, it should lead to a noticeable improvement in the TB figures. This should be analysed carefully and results made available to the TB forum.

Reducing the risk posed by badgers (TB Forum Recommendation 4)

ICSA does not accept that vaccinating badgers is an acceptable alternative to culling programmes where there are disease outbreaks. ICSA believes there is need for more research and analysis. Particular problems have been observed with disturbance of badgers arising from infrastructure projects such as motorways. ICSA wants to see a greater proportion of badgers tested for TB at culling and more research into how effective vaccination programmes can be, given the difficulty of reaching all badgers and identifying the badger populations at risk. Do we have a precise figure for the badger population of each county?

Reducing the risk posed by deer (TB Forum Recommendation 4)

See above.

Tailored, simplified communications on TB Eradication Programme between DAFM and herdowners (TB Forum Recommendations 1 & 8)

ICSA does not accept that the herd risk categorisation letters sent out to herd owners were in accordance with what was agreed at the TB forum. The letters went well beyond stating how long the herd was clear and branched into recommendations on specific animals which clearly has the potential to devalue such animals. Moreover, information provided on specific animals which had been bought in provided the potential to analyse confidential information about other herds. The consequence of this is substantial in terms of devaluing other herds and possibly breaching GDPR regulations.

ICSA deplores this because it went far beyond what was agreed at the TB forum especially as it was clear that herd categorisation and the provision of sensitive details in any public manner has been a contentious issue at the TB forum.

The provision of information on biosecurity and other general information on TB spread is not a problem provided that individual herds or animals are not devalued. If the long-term strategy is to categorise animals or herds and to make this information available to other farmers, then this cannot possibly be considered unless there is an agreed policy of compensation and the availability of funding to cover this.

Stakeholder Ownership and Involvement / Standardised RVO meetings (TB Forum Recommendations 10, 2, 11)

ICSA supports the strategy here. It is important that there is a precise clarification of the decision making process at the TB Forum. Where it comes to contentious issues, it is not acceptable that state agency representatives are treated as stakeholders. Instead, the role of representatives who are not directly impacted financially should be as advisors rather than as stakeholders.

In addition, seats were allocated to individual farmers who do not have any mandate. The farmer representation on the TB Forum should be strictly limited to recognised social partner farm organisations. Bi-lateral meetings were an important element of the TB Forum and should continue to be part of the process.

The establishment of 2 technical working groups is a welcome development. (Finance Working Group and Implementation Working Group)

Improved DAFM TB Breakdown Communication (TB Forum Recommendations 1, 2 & 8)

A key element is that DAFM delivers a single point of contact arrangement for herdowners experiencing a breakdown. It is very frustrating to have to deal with various officials and at times, be

unable to contact relevant people or get answers to queries or representations. Each farmer should also be able to nominate a farm organisation representative who would also have access to a single point of contact.

There should be one single contact for each county who is able to liaise with the farmer/ farmer representative and get quick answers from all DAFM officials including veterinary officers.

Financial Aspects of the TB Programme

The ambition for agri-food expansion set out in successive strategies by DAFM (Food Harvest, Food Wise etc) is not feasible without implying additional costs for the TB programme. It is absurd to imagine that the plan to go from €10 billion of agri-food exports to €19 billion (currently at €14 billion) could be achieved without consequential increases across many areas of cost, including obviously the TB programme. If the state is not prepared to handle the additional costs of the TB programme, it should not deliberately promote expansion programmes.

But of course, the increase of €4 billion in agri-food exports in recent years provides a substantial benefit to the exchequer and it is unacceptable that farmers who have delivered this are then expected to pay a price even though the exchequer has gained.

ICSA has asked for a breakdown of how DAFM expenditure on the programme. The latest breakdown of expenditure is €34 million for DAFM which has risen significantly from €26 million. Financial supports to farmers at €21 million are significantly less than they contribute through testing, levies and own labour.

ICSA awaits the cost/ benefit analysis with interest. In our view there is a potential for DAFM staffing costs to be excessively allocated to the TB programme given that even in the absence of TB, there would be a requirement for some level of DAFM vets and officials in animal disease control.

ICSA believes that cost control needs to be fully explained also. We have made points regarding the cost of officials sitting in marts to find information which is readily available elsewhere, and also to question whether on-farm visits could be considerably reduced. Covid has demonstrated that further savings are possible with online meetings.

ICSA also believes that the prices paid by meat factories in respect of reactors is an unacceptable rip-off of the state and that DAFM needs to take a more aggressive approach in ensuring that meat factories are not profiteering on this. ICSA also wants to see a more streamlined weekly agreement with meat factories to ensure prompt removal of reactors from farms.

This is critical not just from the point of view of cost saving for DAFM but also in the context of a fair and agreed compensation programme. In our view, the outgoing TB Forum has unfinished business 7 regarding the various compensation elements. DAFM has been unfairly restrictive in relation to hardship / depopulation / income supplement grants (no off-farm income for hardship; whole month payment and other restrictions for income supplement/ depopulation). On the other hand, ICSA questions the financial efficiency of the appeals process being over-used by DAFM and whether it is cost effective to fight over peanuts.

ICSA also wants to ensure that independent valuers are left to do their job and that compensation ceilings are significantly amended in the case of breeding stock.