



ICMSA

Submission

to the

Joint Committee

On

Agriculture and the Marine

on TB

Eradication

March 2021.

Mr. Chairperson, Committee members, ICMSA wishes to thank you for the opportunity to present our views on the eradication of bovine TB (bTB). Ireland has seen a significant rise in bTB since 2016 and it is important that a downward trend can return as soon as possible to eliminate this disease in the timeframe outlined in the recently published bTB Strategy document.

It is very ambitious and to achieve this target, there needs to be significant changes in the approach from all stakeholders involved. Farmers remain to be convinced that the proposals set out by the Department will be effective but ICMSA will work with all stakeholders to ensure that effective measures to reduce and eliminate bTB from Ireland will be successful. The Department proposals would effectively mean that further restrictions and/or testing for farmers and ICMSA feel there must be further financial supports in place for farmers impacted by the new regulations.

The Strategy outlined eight key areas in which the eradication of bTB will be delivered and thus, ICMSA will focus on some of those areas as part of opening statement.

- 1. Working in partnership.**
- 2. Reducing cattle-to-cattle spread.**
- 3. Tackling disease transmission at the wildlife/cattle interface.**
- 4. Local area action plans.**
- 5. Improving communications about bTB.**
- 6. Legislative changes at EU level from April 2021.**
- 7. Financial.**
- 8. Improving programme effectiveness.**

1. Working in partnership.

The TB eradication programme has been ongoing for almost seventy years. While progress has been made, it has come at a huge cost for farmers and the trend at present is hugely concerning.

The new approach in the implementation of the Strategy over the coming years is using a Stakeholder Forum which will be supported by three working groups, a Scientific Working Group, a Financial Working Group, and an Implementation Working Group. These cannot become talking shops and decisions must be taken as equal partners.

The risk categorisation of herd is a case in point of working in partnership. Risk categorisation is whereby farmers are categorised based on the number of years a herd has been clear and how many breakdowns it has experienced in the preceding 10 years. This was a very contentious issue in 2020 and should not be repeated if the Department of Agriculture, Food & Marine to retain farmer support for the TB programme.

2. Reducing cattle-to-cattle spread

Reducing cattle to cattle spread is a central part of this strategy and given the ongoing increase in herd size in the dairy herd, this aspect needs careful planning and consideration.

The Department has indicated that there will be a new targeted risk-based policy which will specifically address the risk of recurrence in herds, herds experiencing restrictions significantly more than the average, inconclusive animals, and increased look at biosecurity.

A tailored bTB risk management plan for those herds will most likely be designed by a veterinarian familiar with the herd and the local context. ICMSA believes

that such plans should be reviewed at defined intervals to evaluate their progress and should be agreed with the herd owner. If such large outbreaks are part of a black spot area, it must be in conjunction with a local area plan. ICMSA feel it is essential that appropriate supports are in place for the farmers impacted by these additional measures and will be outlining these in the upcoming group meetings.

The potential use of additional targeted tests to identify infected animals and the continued blood testing of higher risk animals each year at the round test will lead to additional workload and stress on farmers and animals. There is a lot of stress from bTB testing animals on farm and ICMSA feels that the rationale of additional testing must be clearly justified, that no additional costs are imposed on these farmers and that financial support is available where required and justified. The removal of so called “higher risk” animals needs to be done on the basis of agreement with the herdowner.

Cattle which test inconclusive to the bTB skin test are at a higher risk of being detected as infected in the future according to Department research; they therefore pose a risk of spreading disease onwards to other cattle within their herd. ICMSA is in favour of the removal of all inconclusive animals provided appropriate financial compensation is in place.

From a biosecurity perspective, there should be a more targeted approach to biosecurity whereby once a TB reactor is identified in a townland, a local action response plan should be set up to deal with all the major issues that may arise. This will encompass wildlife and biosecurity measures.

3. Tackling disease transmission at the wildlife/cattle interface

ICMSA support the continuing wildlife programme to vaccinate badgers to prevent them from getting infected with bTB, and removing badgers where necessary, and to identify and map setts. Setting out specific advice to farmers on the actions they can take to reduce the risk from badgers and ongoing research on the risks at the cattle/wildlife interface and how these can be effectively detected, understood, and mitigated is important. All these actions are essential but must be evaluated continually to ensure that they are effective and leading to a reduction in TB occurrence. The new strategy must also address the reality that deer play a role in spreading bTB to cattle by putting in place a deer control strategy. Further research into the ecological and epidemiological factors affecting deer/cattle bTB transmission must also be initiated to examine the options to eliminate potential infection.

These actions are important, but they must be implemented consistently all over the country. The Department must recognise the role of deer in TB transmission and address it accordingly. A wildlife management plan should be drawn up in relation to each outbreak and a copy provided to the farmers setting out clear timeframes for actions. ICMSA believe that a detailed investigation should be carried out in all cases of TB outbreaks. Removal of the infection requires a multifaceted approach and there must be clear commitments to address badgers and deer where they are a potential source in an area.

4. Local area action plans and Improving communications about bTB

Where higher levels of bTB are occurring in certain areas, DAFM have outlined how they will put in place action plans to address the risks and reduce disease spread by supporting research and investigating the local factors driving the increase in disease and the actions needed to mitigate these drivers. They will

also provide advice and information to herdowners in the area. It is hugely important that there is one single point of contact within DAFM for a farmer suffering from an outbreak to communicate with and it is disappointing that this issue has been omitted from the strategy.

DAFM say they will give clear information on the ways in which bTB can spread and how these transmission routes can be blocked or mitigated. This will include advice on buying in cattle, how the TB tests work, how to reduce the risk of residual infection and how to reduce the risk from wildlife. The actual implementation of this measure will be important as ICMSA believe that while it may not stop the spread of TB in the short term, it will create greater awareness of the TB risk factors and over time, play a role in reducing TB levels.

6. Legislative changes at EU level from April 2021

The most significant change in the regulations is the requirement for pre or post-movement testing of cattle unless both the animal and the herd of origin were TB tested in the preceding six months. This applies to countries or regions with significant TB levels, including Ireland. ICMSA does not favour a compulsory TB pre-movement test and if required by EU legislation, would favour a phased in basis for this requirement and will work with the Forum to implement this in practice if required. ICMSA believe that a post movement test will not work in practice and should focus on pre movement only, the cost of which should be borne by the Department.

7. Financial

For 2020, direct funding from the State will be approximately €57 million, funding from farmers will be €35 million and funding from the EU will equate to just over €4 million. These figures do not include the cost of farmers time or the reduction in animal performance.

A high-level breakdown of costs associated with the Programme are:

- TB testing - €35 million
- DAFM staff costs and Programme supplies - €34 million
- Financial supports to farmers - €21 million
- Wildlife Programme - €4.6 million
- Research - €2.2 million

The TB Stakeholder Forum groups are currently discussing financial aspects of the Programme looking at the on-Farm Market Valuation (OFMV) Scheme and the Costs and Benefits of the TB Programme. The issue of financing the eradication is hugely significant. The biggest worry from a farmer's perspective of receiving a positive TB result is the financial impact on their business.

The valuation model must ensure that farmers are adequately compensated for their losses. In addition, the Income Supplements needs to be reformed to reflect the actual losses of farmers who are currently under compensated. From a dairy farmers perspective, a fairer way to estimate the loss of milk value would be an initial start to ensuring equality. ICMSA estimates that the Income Supplement should be closer to €90 per cow as opposed to the current €55.

The retention of excess dairy calves due to a TB restriction on a holding is particularly stressful for farmers experiencing a chronic breakdown. ICMSA believe that specific herds should be designated (not dealer herds) as designated TB calve rearing herds with appropriate biosecurity provisions. The sale price for these calves would reflect the market value at that time with the Department supplementing the price paid to reflect the market value if required.

The hardship grant currently applies from November to April inclusive. ICMSA propose that for chronic cases, this would be extended to the entire year due to rising feed costs.

If farmers with large outbreaks or those who have had more than one outbreak in the last five years are going to be asked to hold onto animals longer or a 30-day premovement test, the infrastructure and finance must be in place to guide these policies. Front loading of finance is critical and ICMSA believe that the Department need to aggressively fund the programme in the early years to deliver the dividend in later years.

ICMSA is also proposing a TB loan repayment break like the recent COVID-19 break for those herds who are restricted for over 300 days in the previous 24 months. This should be aligned with the SCBI and guaranteed by DAFM to ensure that no penalties or credit ratings marks are put on the farmer in question.

Chairman, from an ICMSA perspective, we are willing to work with the Department to deliver real results for farmers but critically, the Department must front load the funding of the programme and address all aspects of wildlife.

Thank you.