Royal College of Veterinary Surgeons Consultation Response - Bovine Tuberculosis: The Government's approach to tackling the disease and consultation on a badger control policy

The following response is made on behalf of the Royal College of Veterinary Surgeons (RCVS). The RCVS is the regulatory body for veterinary surgeons in the UK. The role of the RCVS is to safeguard the health and welfare of animals committed to veterinary care through the regulation of the education, and ethical and clinical standards of veterinary surgeons and nurses, thereby protecting the interests of those dependent on animals, and assuring public health. It also acts as an impartial source of informed opinion on relevant veterinary matters.

As a regulatory body, the RCVS will limit its comments to those areas where there are clear indications of relevance to the College's role and where the new policy may require the Government, the veterinary profession or the public to seek assistance from the College.

The RCVS welcomes the Government's review of the approach to tackling Bovine Tuberculosis (bTB) and the College strongly supports comprehensive, coordinated and science-based action to reduce or eradicate this serious infectious disease.

As the Consultation document notes, bTB is one of the biggest challenges facing the cattle farming industry. The disease has a major economic and social impact on farmers and it places a significant and rising cost burden on central Government. Aside from the economic arguments for tackling bTB, there is also an important argument for controlling the disease on animal welfare grounds, as both farmed animals and wildlife suffer from the disease. It is important to note that bTB is a zoonotic disease and failure to tackle the continually growing reservoir of this serious disease presents a potential threat to human health, both to those who work with farm animals and in situations where companion animals, that live in close proximity to humans, may have contracted the disease from infected wildlife or farmed animals. History and the actions of Governments in other countries have shown that this disease can be controlled and eradicated.

For the above reasons the RCVS considers that it is imperative that the Government prioritises the development and implementation of an effective science-based approach to tackling bTB. Whilst science should form the basis of any policy on bTB control, it is important to note that the scientific evidence in this field has been interpreted in different ways, not least because tackling bTB is an intensely political issue with interested and involved stakeholders approaching the issue from opposing standpoints. Consequently, therefore, the Government must be prepared to take difficult political decisions in order to implement, oversee, monitor and manage any effective policy to control and eradicate the disease, and be prepared to ensure that any policies are in place for a sufficient length of time truly to test their effectiveness

To have a real impact in reducing bTB it is essential that the Government takes an holistic approach to tackling the disease. Cattle control measures should form the basis of such an approach, but the significant reservoir of the disease in wildlife, and in particular badgers, cannot be ignored. Government cannot avoid facing the political reality of the situation and the responsibility lies with Government to take tough decisions that may prove to be less than palatable to some of the parties concerned.

The evidence from history and overseas suggests that any approach to tackling bTB will need to be in place for 20-30 years for control of the disease to lead to eradication, it is imperative therefore that whatever approach the Government chooses to tackle bTB, it can be delivered and coordinated for a sustained period. The policy and approach should also be flexible enough so that it can adapt to changes such as the development and authorisation of a cattle vaccine or significant changes to animal keeping and farming practices under differing conditions and locations. Such flexibility should also provide the Government with an exit strategy, so that if culling were to be adopted as an approach to tackling bTB this could be ended when it was no longer needed and therefore unnecessary culling could be prevented.

BADGER CONTROL

Tackling a disease where there is a known wildlife reservoir, in the absence of a proven vaccine for the target species (in this case a vaccine against bTB for cattle), is one of the most difficult exercises that can be undertaken. Nobody wishes to see badgers being culled, but if any potential wildlife source of bTB is ignored then Food and Environment Research Agency modelling evidence (FERA, November 2010, 'Comparing badger (Meles meles) control strategies for reducing bovine TB in cattle in England') suggests that the timescale of any control strategy will be prolonged, the overall cost will be greater, and in the long-term there will be a more negative impact on the welfare of both the reservoir and target animals. The public popularity of the badger is a major issue in this debate but it would be unwise if, in considering the control of a serious animal and zoonotic disease, sentimentality unduly influenced scientific objectivity. Furthermore, it should be noted that the badger is not an endangered species. The question of who should pay for a badger cull or other intervention strategy is for Parliament to decide, having considered all the available evidence, both scientific and social.

Coverage, Coordination and Compliance

In order to be effective, any approach to tackling bTB must be coordinated and cover an adequate area so as to address thoroughly the reservoir of the disease and to have the maximum possible benefit, whilst reducing the suffering caused by inadequate or ineffective implementation of a culling strategy.

Under the current proposals it is unclear how a coordinated approach with adequate coverage will be ensured. There is the possibility that in an area of high prevalence no licence applications may be made, or licence applications that do not meet the minimum criteria may be submitted. In such circumstances the College would propose that Government should step in and implement measures to ensure that the overall control programme is not jeopardised.

It is to be commended that, under the current proposals, licensees will be expected to commit to sustained culling over an agreed minimum period. It should be noted, however, that four years of actual culling is likely to be the minimum effective period. Evidence suggests that, due to the perturbation effect, incidents of TB in cattle may increase in the initial stages after culling has begun, consequently there appears to be a real risk that licensees may abandon culling. It is important that commitments to cull can be enforced and that there are provisions in place should a licensee decide prematurely to abandon the culling process. Licence commitments must be enforceable and enforced, and licensees must be educated as to the potential effects of culling. Furthermore, contingency plans must be in place if culling is abandoned or a cull has to be stopped because a licensee fails to achieve the conditions of their licence. Plans should also be put developed to ensure that control measures can remain in place in a licensed area even when there are significant changes to land tenure and ownership. It would be unacceptable for a cull to be prematurely abandoned resulting in animals having been needlessly killed.

The devolved nature of bTB control measures has the potential to affect adversely the effectiveness of any policy to tackle the disease. The Government must take steps to ensure a coordinated approach with Wales. The English/Welsh border is an area of particularly high prevalence of bTB, and thus clarification should be provided as to how a coordinated approach to the delivery of badger culling and vaccination can be ensured where a licensed area may be on the border or a licensee's land may cross the border.

The veterinary profession is likely to be very closely involved with any approach that will involve the culling of wildlife. From a regulatory point of view, therefore, it is essential that detailed guidelines are developed in full consultation with the veterinary profession in relation to when and where licences are issued, the conditions that licensees must meet and how such conditions are managed and enforced.

Vaccination of Badgers

The College lends its strong support to the vaccination of badgers and considers that this should form an integral part of any long-term approach chosen by the Government to tackle bTB. However, the evidence shows that vaccination does not work in the previously infected animal, therefore the greater the prevalence of the disease the less effective the programme will be.

Unlike culling, the evidence suggests that the vaccination of badgers does not disrupt social groups and therefore as an approach to tackling the disease it does not suffer from the risks associated with perturbation. Also, interpretation of modelling data (FERA, November 2010, Op. cit.) suggests that vaccination could be used as a means to reduce the risks associated with perturbation caused by culling, for example, by the ring-fence vaccination of an area prior to culling. It would appear that this could have a particular value where a licensed area may not be completely surrounded by physical borders that could control the perturbation of badgers. Vaccination could also be used within licensed areas, on land where the owner may not wish to cull badgers, as a means of controlling the disease and reducing perturbation risks.

Vaccination may have a role to play in creating buffer zones around highly infected areas, which could be used to assist in controlling the spread of bTB. The development of such buffer-zones, however, may require the Government to incentivise the process so as to ensure a high enough level of participation.

The College would strongly urge Defra and its associated bodies to continue the important research into developing an oral bait vaccine for badgers. Such a vaccine could significantly improve the cost-effectiveness of vaccinating badgers as well as increasing the speed at which large numbers of badgers could potentially be vaccinated.

Under the Government's current proposals a significant proportion of badger vaccinations is likely to be carried out by non-veterinary 'lay vaccinators' who have completed the approved training course laid out in the Veterinary Surgery (Vaccination of Badgers Against Tuberculosis) Order 2010 (SI 2010/580).

At the time when this Exemption Order to the Veterinary Surgeons Act 1966 was being developed, the RCVS was consulted on the content of the training course. In the main the RCVS was satisfied with the course content, but at the same time the College raised a number of concerns. Whilst some of these concerns were addressed there are outstanding issues relating to the use of lay vaccinators where the College wishes to seek clarification.

The lay vaccinators Order appears to envisage a veterinary surgeon directing administration of the vaccine to one badger or a group or sett of badgers and not, as has been suggested, that instruction on the use of vaccines by a veterinary surgeon during the approved training course fulfils the requirement of veterinary direction. Clarification must be sought on this important issue and the precise role and responsibility of the directing veterinary surgeon must be defined clearly and unambiguously.

Furthermore, it is important that clarification is sought as to whether the lay vaccination of badgers falls under paragraph 4(2) of Schedule 3 to the Veterinary Medicines Regulations (VMRs) relating to the treatment of wild animals under the authorisation of the Secretary of State, which would negate the need for the prescribing veterinary surgeon to have the animal under his or her care, or to have carried out a clinical assessment.

Whilst vaccination is generally a proven and effective way of controlling and preventing the spread of disease, its effectiveness varies with the efficacy of the vaccine and the conditions under which it is stored and delivered. Vaccination therefore only forms a part of any successful approach to tackling a disease.

Humaneness, Health and Safety, and Appropriate Training

There are concerns regarding both the appropriateness and the health and safety implications of the free-shooting of badgers. Whilst, as the Consultation document notes, free-shooting is a widely used method of controlling a large variety of wildlife, it has not been scientifically tested as a method of dispatching badgers in a control programme. It is unclear therefore whether free-shooting is appropriate and humane for badgers or whether it may result in the unnecessary suffering of animals as a result of wounding or maiming, exacerbated at night by not being able to follow this up with euthanasia. In addition, it

should be questioned whether free-shooting could be as effective as cage-trapping and shooting, in terms of the dispatching of whole setts of badgers, or whether it carries the risk of increased perturbation of the animals. Notwithstanding that night shooting of wild animals is commonly practised, and that following codes of practice such as The British Association for Shooting and Conservation's 'Code of Practice - Lamping (Night Shooting)' can significantly reduce risks, the College has concerns regarding the potential for injury to members of the public and livestock, made worse by the fact that badger culling has significant potential to attract protestors who could put themselves at considerable risk.

The College would reiterate the proposal in the Consultation document that those charged with dispatching badgers by free-shooting or cage-trapping and shooting should be appropriately trained and licensed. Moreover, the College would propose that such operators should be required to complete an approved course specifically developed in this regard and that the completion of such a course by operators should be a condition placed on the issuance of the over-arching licence to cull in a particular area.

A further concern for the RCVS relates to the fact that veterinary surgeons are often asked to countersign firearms certificates: ensuring that operators have undergone appropriate training and licensing would offer veterinary surgeons extra reassurances that the persons whose firearms certificates they were asked to countersign were fit and appropriate to receive such a licence.

Record-keeping and Evaluation

For reasons of bio-security and auditing it is imperative that badger carcasses are collected, transported and disposed of appropriately. This will place a considerable cost burden on the licensees. It will therefore be important to put in place measures that ensure that licensees and their contractors correctly dispose of carcasses and that such disposal procedures are adequately enforced.

It is imperative that licensees keep detailed records and that these are made available for inspection or are submitted to the relevant authority. Such records should cover issues such as when their operatives are going out shooting, how many badgers are shot and where, where and how many cages are set and where badgers have been vaccinated. This will allow a thorough audit of the control measures in licensed areas to be performed and will allow cross-checks to be made against badger carcasses and, in the case of vaccinations, against how many doses of vaccine have been used.

CATTLE CONTROL MEASURES

Cattle-to-cattle transmission is a known and proven source of the spread of bTB and therefore science-based cattle control measures are a vital part of any policy to tackle bTB. The RCVS welcomes the work of Defra in reviewing the current cattle control measures and the move towards a more effective risk-based approach as outlined in Section 2 of the Consultation document. The College awaits the publication of further proposals in relation to cattle control measures and will provide detailed comments at that time.

NON-BOVINE SPECIES

Bovine TB is a dynamic disease that is spreading in the context of ever-changing farming and animal-keeping practices. The RCVS welcomes the commitment made in the Consultation document to review the existing policy on bTB in non-bovine species and particularly in camelids.

RESEARCH AND DEVELOPMENT

The College strongly supports the work of Defra and its associated bodies in the development and authorisation of a bTB vaccine for cattle and the associated DIVA test. The latter will allow infected animals to be differentiated from those that have been vaccinated, a vital requirement if trading of animals is to be allowed under the present legislative regime.

The vaccination of cattle against bTB is likely to play a crucial role in achieving the ultimate goal of eradicating the disease. At present, however, as the Consultation notes, European Directives both prevent the vaccination of cattle against bTB (EU Directive 78/52/EEC) and the trading of cattle that have not been shown to be bTB negative using the tuberculin skin test (EU Directive 64/432/EEC). The Government must ensure therefore that evidence is provided to European officials so that the necessary changes can be made to European legislation so as not to slow the practical usage of vaccination. Contingency plans should also be developed for tackling bTB in the event that Europe does not accept the justification or need for changing the Directives.

The College urges the Government to continue funding this important research and development work and to ensure that adequate representation is made so as to ensure that the legislation is changed to reflect the latest scientific developments in vaccinating and testing cattle.

If clarification on the above comments is required, please do not hesitate to contact the College. Representatives from the RCVS would be happy to meet with officials and ministers to discuss and expand upon this statement.

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