

Response of the Competent Authorities of the United Kingdom to the recommendations of Report ref. DG(SANCO)/2011-6057-MR of an audit carried out from 05 to 16 September 2011 in order to evaluate the operation of the bovine tuberculosis eradication programme in England and Wales

N°.	Recommendation	Action Proposed by the Competent Authority
1	<p>Ensure effective co-ordination/co-operation between the AHVLA and the Local authorities as foreseen in Article 4(3) of Regulation (EC) No 882/2004, particularly in relation to official controls over a) cleaning and disinfection of vehicles/markets and b) dairy establishments;</p>	<p>The Competent Authority accepts that there are enhancements that can be made to the current enforcement framework.</p> <p>The establishment of the Animal Health and Veterinary Laboratories Agency's (AHVLA's) Regulatory Hub in May 2009 has led to more effective coordination between Local Authorities (LAs), the Food Standards Agency (FSA) and AHVLA.</p> <p>We are developing robust protocols to ensure improved auditing, monitoring and compliance with TB-related cleansing and disinfection requirements at slaughterhouses, markets and vehicles and will have new protocols in place by the end of April 2012. This will also include improving advisory material and channels so that operators are fully aware of the requirements for cleansing and disinfection and that guidance is given when markets are approved or inspected. Cleansing and disinfection issues identified on the particular premises visited during the FVO inspection have now been resolved and a revised cleansing and disinfection protocol for the slaughterhouse is in place. We are updating instructions on cleansing and disinfection for slaughterhouses. These will be published for implementation by the end of February 2012. The new instructions will include a reminder for Official Veterinarians to check that the disinfectants used (and their working concentration) are appropriate for bovine TB control. We are developing reports that will give immediate access to comprehensive details of all dairy herds with Officially Tuberculosis Free (OTF) status</p>

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	<p>minimum of 8 weeks (and preferably for 10–12 weeks) at 37°C with or without CO₂ in line with chapter 2.4.7 of the OIE Terrestrial Manual 2009;</p>	<p>Terrestrial Animals recommends a minimum 8-week incubation period, we would welcome further advice from the EU Reference Laboratory.</p> <p>Our current laboratory protocol already maximizes the sensitivity of the culture process. This is as a result of recent technological advances (e.g. routine use in parallel of a range of solid and liquid culture media for all samples) and through the targeted application of increased incubation periods for certain types of samples. This includes those from visibly lesioned but culture negative reactors, slaughterhouse cases (where histology is indicative of a mycobacterial infection but the initial culture is negative) and non-bovine animals.</p> <p>An 8-week culture incubation period for every sample would also present practical difficulties in terms of a mismatch with the interval between tuberculin tests in herds that are trying to regain OTF status, where 6-weeks herd testing is acceptable under 64/432/EEC. Even if minimum 60-day intervals are used for consecutive skin test (as in the UK), a minimum 8-week incubation period would entail delaying tuberculin skin testing in order to determine the type of interpretation required test, or delaying the lifting of herd restrictions pending completion of the extended culture incubation times.</p> <p>We understand that there is variation in the <i>M. bovis</i> incubation times adopted by various National Reference Laboratories for bovine TB and that, at a meeting of those laboratories that took place on 14 December 2011 in Madrid, it was agreed that the EU Reference Laboratory would undertake a review of the culture methodologies currently in use across the EU. We believe it would be</p>

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		prudent to await the outcome of that review and the development by the EURL of revised guidelines for all Member States which take into account the latest technological developments in this field.
4	Ensure that movements are promptly recorded in passports as required by Article 7(2) of Regulation (EC) No 1760/2000;	<p>The Competent Authority accepts this recommendation. Movement records in passports are routinely checked as part of the programme of Cattle Identification Inspections. When errors are detected inspectors take action. This ranges from advice to keepers and supervision of correction of passport to removal of passports. In more complex cases, passports are reissued following satisfactory investigation. Errors are reflected in cross-compliance penalties.</p> <p>The local AHVLA offices have completed a further visit to the farms and to the market visited by the FVO inspectors and have confirmed that all records are now correct and up to date. Errors identified at the market were due to an IT issue, which has now been corrected.</p>
5	Consider the revision of a) how holdings are managed/classified, given that the County/Parish/Holding number (CPH) may at present cover large geographical areas and comprise multiple premises and herd registers and b) consider reviewing the use of "links" so that all movements between holdings can be registered in the central (British Cattle Movement Service) database, as required by Article 7(1) of Regulation (EC) No	<p>The Competent Authority accepts this recommendation in relation to TB controls in connection with CPHs.</p> <p>With immediate effect we will ensure that partial holding restrictions are only applied where appropriate, in particular where doing this would not compromise disease eradication.</p> <p>In England we had already identified this as an issue through our review of the</p>

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	<p>1760/2000, and the place where cattle are kept, held or handled can be readily identified. In the light of points a) and b) consider revising the conditions for the placing of partial holding restrictions and the operation of "separate" premises;</p>	<p>County Parish Holding Number System. We are currently finalising proposals to address as soon as possible movements between higher TB risk 'linked' holdings and Sole Occupancy Authorities (SOAs) over long distances and between areas of different TB testing intervals. Stage one would involve (early in 2012) rejecting new and/or renewed applications for links and SOAs spanning areas with different testing frequencies. We would then look to deal with the <i>existing</i> higher TB risk links and SOAs as soon as possible thereafter. The recently published report by the Task Force on Farming Regulation in England suggested changes to the wider CPH system, which would see the abolition of links and SOAs and revise the way that holdings are classified. However it is unlikely that, if accepted, that these changes could be made before 2013 at the earliest. In Wales, the AHVLA CPH transfer project, phase one of which commenced during 2011, builds on various reviews and recommendations to date, which have identified opportunities to simplify the current landscape of livestock movement controls. The intention is to agree a standardised set of holding registration rules that will apply to all livestock keepers, to include the removal of CTS links and Sole Occupancy Agreements and implementation is planned to get underway during 2012. Pre-exports checks on cattle are carried out at the CPH (County-Parish-Holding) level. Therefore, holdings with split OTF status cannot qualify for live cattle exports to other Member States until the TB movement restrictions have been lifted from all the premises under the same CPH.</p>

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6	Ensure that where pre movement testing is required, animals have passed an intra dermal test within 30 days prior to movement as required by either point I(1)(c) of Annex A to Directive 64/432/EEC or Article 19(ii) of Council Directive 78/52/EEC;	The Competent Authority accepts this recommendation. By April 2012 we will be making the necessary changes to our current testing requirements for cattle that are moved (under licence) between non-OTF holdings.
7	Ensure that post movement testing is carried out in a non discriminatory way and on a risk basis as foreseen in Article 3(1) and (6) of Regulation (EC) No 882/2004;	We do not consider that the current application of post-import testing of cattle imported for breeding and production into Great Britain from high bovine TB incidence Member States is discriminatory, as it does not have a disproportionate effect on intra-community trade. These tests are funded by the UK Government and therefore do not present a barrier to trade. The reason for these tests (which have been in place since well before the implementation of our domestic pre-movement TB testing policy in 2006) is that we do not always receive notifications of forward tracings from herds where OTF status has been withdrawn in other countries. By contrast, we systematically instigate source and spread tracings (including to other EU Member States) for all herds in the UK that have their OTF status withdrawn. Private post-movement testing (paid for by herd owners) is already encouraged as best practice for domestic cattle movements in England and Wales.
8	Continue the adjustment of compensation so that breeders are appropriately compensated throughout the UK as foreseen in Article 3 of Council Directive 78/52/EC;	The Competent Authority accepts this recommendation. In Wales, a review of the compensation changes implemented in 2010 (reductions of compensation of up to 95% if farmers do not comply with

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		<p>Veterinary Improvement Notices (VINs), allow their TB tests to become overdue, do not comply with the regulations or if the animals could not be presented for testing and had to be slaughtered) will be carried out in 2012. In England, we are planning to introduce changes to the table valuation system in Spring 2012. The changes include addressing the issue flagged i.e. splitting the existing categories for calved dairy animals so that older dairy stock are compensated at a lower level than younger stock. We will also reduce compensation payments for farmers with overdue TB tests (i.e. implementing the changes already introduced in Wales in 2010). We will also keep compensation under review as part of our responsibility and cost-sharing agenda in England.</p>
9	<p>Ensure that herds may retain their officially tuberculosis free status only if animals on the holding are subject to routine tuberculin testing (i.e. a whole herd test in 2 and 3 year testing parishes), as required by point I(2)(c) of Annex A to Directive 64/432/EEC;</p>	<p>The Competent Authority accepts this recommendation. We are drawing up proposals in England to implement whole herd testing in two- and three-yearly tested areas by the end of June 2012. Since 1 January 2010 all herds in Wales have been subject to annual whole herd testing following the TB Health Check Wales from October 2008.</p>
10	<p>Ensure that herds are not restocked until all eligible animals have passed one clear TB test as foreseen in Article 17 of Directive 78/52/EEC;</p>	<p>The Competent Authority accepts this recommendation. From January 2012, we will cease to license movements of cattle onto herds with OTF status withdrawn until after completion of the 1st short interval test</p>

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		<p>after identification of a TB breakdown (and all reactors have been removed). This will be an interim measure until the conclusions of the review discussed in recommendations 11 and 12 below considers this issue more widely.</p> <p>We have sent a reminder to field staff of the requirement to revoke any general movement licences issued to allow restocking of non-OTF herds where the TB risk on such holdings may have increased. At present no animals may be licensed onto TB-restricted premises while test reactors remain or if TB testing is overdue on the premises of destination.</p> <p>This will build on the current instructions, which state the requirement to consider the completion of the 1st short interval test following the loss of OTF status before allowing any restocking.</p> <p>We are developing protocols for enhanced management of persistent and recurrent breakdowns by AHVLA from early 2012. This will bring together consideration of biosecurity, farm management and compliance and enforcement. It will also include further guidance on restocking issues for these herds.</p>
11	<p>In order to accelerate the eradication of tuberculosis in cattle, limit where possible exemptions from requirements for the movement of animals from restricted premises as foreseen in Articles 17 of Council Directive 78/52/EEC;</p>	<p>The Competent Authority accepts this recommendation.</p> <p>We are holding reviews of movement controls working with industry representatives. This will include reviewing the current ‘movement off’ options (e.g. Approved Quarantine Units and Approved Finishing Units). This work will</p>

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		be discussed with the EU Commission's Task Force in March 2012. Taking into account any advice from the Task Force, conclusions will be finalised and implemented by May 2012.
12	Ensure that Approved Finishing Units (AFU) and Approved Quarantine Units (AQU), meet all the Animal Health – Veterinary Laboratory Agency (AHVLA) conditions for approval, particularly in relation to bio-security, given that they are allowed to purchase bovine tuberculosis restricted cattle from multiple sources;	<p>The Competent Authority accepts this recommendation.</p> <p>All premises approved as a facility for trading restricted animals are inspected annually. AHVLA are instructed to revoke approvals where a serious breach or repeated minor non-compliances are detected. A reminder has been sent to field staff of the requirement for annual inspections of the facilities and revocation of approvals where there is non-compliance with the conditions of approval.</p> <p>We are reviewing the existing movement controls. The conditions applied to these facilities and the delivery and monitoring of those conditions will be considered by the working groups. Instructions have been included in the AHVLA Operations Manual to suspend approvals of any new AQUs until the review is complete.</p> <p>This work will be discussed with the EU Commission's Task Force in March 2012. Taking into account any advice from the Task Force, conclusions will be finalised and implemented by May 2012.</p> <p>Follow-up inspections have been carried out by the local AHVLA offices to both the AQU and the AFU that were visited by the FVO inspectors. The AQU is now fully compliant with the requirements for approval as set out in the notice of approval. Testing frequency has been increased in the AFU in recognition of</p>

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		the fact that this facility cannot be wildlife proof and a biosecurity protocol has been produced and approved.
13	Ensure that adequate controls are placed on Food Business Operators processing milk without pasteurisation and in particular that the provisions of Section IX, Chapter I, I, points (3) and (4) of Annex III to Regulation (EC) No 853/2004 are applied.	The Competent Authority accepts this recommendation. We are working with dairy industry representatives and environmental health officers from local authorities to ensure that the requirements of the EU dairy hygiene legislation in relation to bovine TB are more effectively implemented and controlled. We will hold meetings with industry representatives and environmental health officers from local authorities by March to identify what measures can be taken to improve effectiveness and act upon those measures by May 2012.