

**DEPARTMENT OF AGRICULTURE AND
RURAL DEVELOPMENT**

**Consultation on a revised Brucellosis Testing
Regime**

6 March 2015 to 17 April 2015

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PART I - BACKGROUND

Background

1. Brucellosis has significant public health and economic consequences and, therefore, the shared vision of DARD and the farming industry is for its reduction and ultimate eradication. Excellent progress has been made in recent years and we are now able to apply to the European Commission for Officially Brucellosis Free (OBF) status for the north of Ireland. Whilst the overall risk of a new brucellosis outbreak is now considered to be relatively low, it is essential that we continue to vigorously implement the Brucellosis Eradication Programme approved by the EU Commission.
2. According to EC Directive 64/432/EEC (“the Trade Directive”), if we have a three year period without a confirmed outbreak of brucellosis and have 99.8% of herds brucellosis-free each year for 5 consecutive years, we can apply to the European Commission to be awarded OBF status. As the 99.8% criterion has been met since 2009, and it has been three years since our last confirmed outbreak, we can now apply to the European Commission for OBF status.
3. The impact of any future brucellosis breakdown would be high. Even an isolated and confined confirmed outbreak could reset the three-year clock (no confirmed cases) in relation to making the case to the European Commission in respect of seeking OBF status. An outbreak with significant lateral spread could also re-set the five-year clock (99.8% herds to be OBF). The total financial consequences would approximate to £8-10 million testing costs for each year’s delay, plus an estimated £7 million per year in compliance costs to farmers.
4. As we move towards achieving OBF status, it is opportune to review what relaxations should subsequently be made to our current brucellosis testing regime.

What is the purpose of this consultation?

5. To seek your views on proposals for a revised brucellosis testing regime in the expectation of attaining OBF status in 2015.

Part II – CONSULTATION PROCESS

6. The Department is carrying out a 6-week consultation to seek views/comments on its proposals for a revised brucellosis testing regime should we attain OBF status in 2015. The majority of changes can only be introduced once we attain OBF status. However, there may be some changes that we can introduce in advance of our attaining such OBF status. This shorter consultation period recognises that there was a consultation on brucellosis pre-movement testing in 2014 and the fact that industry stakeholders have been briefed on what is being proposed.
7. The consultation package includes details of our proposals for a revised Brucellosis Testing Regime and a Regulatory Impact Assessment (RIA) which provides information on the proposals in terms of their impact on industry/stakeholders. The proposals have also been subject to equality screening.

PART III – SUMMARY OF OPTIONS

Options considered for a revised brucellosis testing regime on attainment of OBF status

8. DARD has considered a range of options for a revised brucellosis testing regime on attainment of OBF status, namely:-
 - Maintaining the current surveillance regime.
 - Using a risk-based approach to implement proportionate relaxations to the current surveillance regime.

- Using a risk-based approach to implement proportionate relaxations to the current surveillance regime, whilst allowing for differences in beef and dairy herds.
- Implementing the minimum surveillance controls allowable under Council Directive 64/432.

Option 1: Maintaining the current surveillance regime

9. This option would be the most costly and would involve maintaining the current surveillance regime even after OBF status is attained. The current Brucellosis Eradication Programme includes a routine surveillance programme which is based on annual serological (blood) testing of all beef herds. Most dairy herds are serologically tested biennially, with monthly milk testing to achieve regular monitoring. There is targeted surveillance of some animals at slaughter depending on their age and location. Risk-based testing is also carried out where necessary and follow-up testing is conducted post-abortion. Pre-movement testing is required on all cattle (with the exception of steers) aged over 24 months of age and within 60 days of movement.

Option 2: Implement proportionate relaxations to the current surveillance regime on the basis of risk assessment

10. This is a more measured risk-based approach. Under this proposal the age at which animals would be subject to serological testing will be increased to 24 months. 50% of all herds will be tested in 2015/16 and the remaining 50% will be tested in 2016/17. Over the following three years (2017/18, 2018/19 and 2019/2020), 33% of all herds will be tested each year. Each herd should therefore have at least two herd tests during the five year period following attainment of OBF status. Dairy bulk milk surveillance will continue over the next 5 years to provide an additional level of assurance in dairy herds. There will be targeted surveillance of some animals at slaughter depending on their age and location. Risk-

based testing will continue to be carried out where necessary and follow-up testing will be conducted post-abortion. Pre-movement testing will be abolished as soon as the necessary legislative change is made.

Option 3: Implement proportionate relaxations with separate arrangements for beef and dairy herds on the basis of risk assessment

11. This proposal takes greater account of the added level of assurance that continued bulk milk surveillance testing will provide in dairy herds. Therefore this proposal allows for less frequent serological testing of those dairy herds where bulk milk test results are available in line with legislative requirements. It is estimated that approximately 20% of dairy herds will be tested each year, with each herd receiving at least one herd test over a five year period following attainment of OBF status. In contrast, beef herds will continue to rely solely on the serology tests as in Option 2. 50% of beef herds will be tested in 2015/16 and the remaining 50% will be tested in 2016/17. Over the next three years (2017/18, 2018/19 and 2019/2020), 33% of beef herds will be tested each year. Each beef herd will therefore have at least 2 herd tests over a five year period. The age at which animals in both beef and dairy herds will be tested will be increased to 24 months on attainment of OBF status. There will be targeted surveillance of some animals at slaughter depending on their age and location. Risk-based testing will continue to be carried out where necessary and follow-up testing will be conducted post-abortion. Pre-movement testing will be abolished as soon as the necessary legislative change is made.

Option 4: Implementing the minimum surveillance controls allowable in the Council Directive

12. Council Directive 64/432 sets out the minimum levels of testing which must be met in order to retain OBF status. This requires that every year for the first five years after attaining status, all bovine animals over 24 months of age in not less than 20% of herds will have been tested and will

have reacted negatively to a serological test or, in the case of dairy herds, by examination of milk samples. There will be targeted surveillance of some animals at slaughter depending on their age and location. Risk-based testing will continue to be carried out where necessary and follow-up testing will be conducted post-abortion. Pre-movement testing will be abolished as soon as the necessary legislative change is made.

Preferred option

- 13.** On the basis of a Veterinary Risk Assessment, DARD has concluded that Option 3 is the preferred option as it offers the best balance between best addressing the level of risk of an outbreak remaining undetected on the one hand and achieving a proportionate saving to both farmers and taxpayers on the other.

- 14.** Brucellosis is a highly contagious disease and early detection of the disease is vital in identifying animals suspected of being infected. The disease can have a long incubation period, and infected animals may not show any symptoms of brucellosis until an animal calves or aborts. Abortions are one of the few clinical signs of bovine brucellosis, associated with a high potential for spread within and possibly, between, herds. There remains a risk that an unreported abortion could lead to a significant spread of infection. Such a significant outbreak could affect our OBF status. As a result it is vital, even on attainment of OBF status, that our surveillance regime is risk-based and proportionate and that tests are carried out sufficiently frequently to enable us to identify any potential infection as early as possible.

- 15.** Attaining OBF status will allow us to substantively relax our current levels of brucellosis surveillance testing. However, given the nature of brucellosis and the fact it is possible that there may be some undetected latent infection, the level of surveillance testing should not suddenly drop to the minimum permissible once we attain OBF status, but should proportionately reduce over time. For that reason, it is considered that

proceeding immediately to the minimum level of testing allowable under Council Directive 64/432 would present too high a risk.

16. It should be noted that the surveillance regime outlined in Option 3 will be less significant than that employed by the south of Ireland following their attainment of OBF in 2009. However, a more measured approach can be adopted here given that both the south of Ireland and Britain remain free from the disease.
17. It is also essential that herd keepers continue to report all abortions to the Department so that they can be properly investigated.

Pre-movement Testing

18. Between April and July 2014, the Department consulted on proposals to relax pre-movement testing controls for movements internal to the north of Ireland in a phased manner through to their possible removal once OBF status had been attained. On 3 November 2014, Minister O'Neill introduced changes to pre-movement testing whereby the age threshold at which cattle required a pre-movement test increased from 12 to 24 months and the window for a single movement was extended from 30 to 60 days. If the approval of our OBF application takes several months, we may wish to consider that pre-movement testing be removed as soon as the necessary legislative change is made to the Brucellosis Control Order (NI) 2004 (as amended). Such removal can be effected in advance of our attaining OBF status and will provide proportionate cost savings to both farmers and taxpayers.

Extension of biennial testing

19. If, as anticipated, approval of our OBF application by the European Commission should take several months, it is possible that we may not attain OBF status until late 2015. With the exception of pre-movement testing, the majority of the changes referred to above can only be introduced once we attain such OBF status.

- 20.** However, in addition to pre-movement testing, there is one further change we can introduce in advance of attaining OBF status. Currently, animals over 12 months of age in most dairy herds are tested biennially, whilst animals in beef herds are tested annually. Under Council Directive 64/432, we retain a flexibility to extend biennial testing to all beef herds as well. This is a further change we can consider in advance of attaining OBF status, and we propose to take the opportunity in this consultation to seek industry views on introducing this change ahead of our attaining OBF status.

PART IV – HOW TO RESPOND

- 21.** We invite your comments on the proposed revisions to the Brucellosis Eradication Programme. We ask that you respond to all the questions contained within this consultation document and provide any additional relevant information relating to the changes.

- 22.** Responses to this consultation should be sent to:

TB & Brucellosis Policy Branch (OBF Consultation)
Department of Agriculture and Rural Development
Room 650, Dundonald House
Upper Newtownards Road
Ballymiscaw
Belfast
BT4 3SB
or email to TBBR.policybranch@dardni.gov.uk

Telephone contact no: (028) 9052 4772

- 23.** The closing date for responses is 17 April 2015.
- 24.** The consultation document and response form can be accessed online at <http://www.dardni.gov.uk/index/consultations.htm> under 'Consultations'.

25. Hard copies of these documents can be made available on request or in alternative formats, e.g. large print, audio cassette or other languages.

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PART V – RESPONSE FORM

CONSULTATION ON A REVISED BRUCELLOSIS TESTING REGIME FOLLOWING ATTAINMENT OF OFFICIALLY BRUCELLOSIS FREE STATUS

1. Name/Organisation

Ulster Farmers' Union

2. Postal Address

475 Antrim Road, Belfast BT15 3DA
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3. Responding – I am responding as an (please delete as appropriate)

~~a. Individual~~

b. Organisation

Individual Response – Do you agree to your name, address and response being made available to the public (please delete as appropriate).

Yes /No

If you have answered “No”, please provide your reason in the box below.

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4. **Question 1: Do you agree that the Department should proceed on the basis of Option 3 (i.e. implementing proportionate relaxations with separate arrangements for beef and dairy herds on the basis of risk assessment)?**

Yes	No
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Delete as required.

If not, why not?

5. **Question 2: Relaxation of pre-movement testing controls for brucellosis through to their possible removal was the subject of a public consultation in 2014. In light of the generally positive responses to that consultation, do you agree that removal of pre-movement testing controls be effected in advance of our attaining OBF status on the grounds of cost savings to both farmers and taxpayers?**

Yes	No
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Delete as required.

If not, why not?

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6. **Question 3: As already stated, animals over 12 months of age in most dairy herds are currently tested biennially, whilst animals in beef herds are tested annually. Under Council Directive 64/432 we retain a flexibility to extend biennial testing to all beef herds in advance of our attaining OBF status. Do you agree that we should proceed to extend biennial testing to all beef herds in advance of our attaining OBF status?**

Yes	No
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Delete as required.

If not, why not?

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7. **Potential Economic Impact of the Proposal: A (partial) RIA has been drawn up which considers the potential economic impact of the Department's proposals for a revised brucellosis testing regime on farmers.**

Do you agree that the analysis of the evidence given in the accompanying (partial) RIA accurately describes the potential impacts of these proposals?

Yes

8. Equality Impact: Under Section 75 of the NI Act 1998, DARD is required to have due regard to the need to promote equality of opportunity:

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependants and persons without.

Our policy proposals as detailed above have been screened in terms of equality and it has been concluded that there will not be any differential impact on the groups listed above. We would, however, welcome any comments on the equality aspects of the consultation.

No further comments

Thank you for your response to this consultation exercise.