Summary Report

Implementation of Policy on Bovine Viral Diarrhoea (BVD) – summary and analysis of consultation responses Department of Environment, Food & Agriculture, Isle of Man Government, 5 February 2018

Introduction and overview of the consultation

The public consultation launched on 13 November 2017 and closed on 29 December 2017. The consultation requested responses on the proposals for the next phase of the BVD Scheme (designed to progress further towards eradication).

The consultation attracted 25 responses. Of these 7 gave their permission for their response to be published in full, 17 gave permission to publish anonymously and 1 did not give permission. 19 of the respondents stated they are cattle keepers.

12 responses were made on behalf of organisations.

The majority broadly agreed with the proposals, with only one person expressing the view that BVD eradication is not desirable. Most respondents said that PI animals needed to be removed from the herd as soon as possible following positive retesting and that no compensation should be payable. That movement restrictions should be put in place where it was deemed necessary to do so; to aid the eradication of BVD, to further benefit and promote the value of 'Isle of Man' livestock.

Those who disagreed with the proposals said that the BVD scheme was already restrictive, costly and impractical.

General – Your perspective on the current scheme:

Question 1 - Are you a cattle keeper?

Are you a cattle keeper?



Of the 25 respondents, 19 said they were a cattle keeper, 6 said they were not.

Question 2: Is the eradication of BVD desirable?

Is the eradication of BVD desirable?



Of the 25 respondents, 23 agreed that the eradication of BVD is desirable, 1 did not agree and 1 did not answer.

The majority of respondents felt that the eradication of BVD would be beneficial to herd health and welfare:

- 'The eradication of any disease in livestock is desirable from all perspectives as it can only increase their health and well-being as well as improving the productivity and profitability of people's herds'
- 'Eradicating any disease which adversely affects animal welfare, farm productivity and makes the Isle of Man a leader in production animal health and welfare has to be a step in the right direction'
- 'we have been pressing hard to eradicate BVD on the Isle of Man and would like to see the island declared the first official BVD free Jurisdiction'

One respondent felt it was 'expensive'.

Question 3: What do you see as the benefits of BVD eradication?

76% of respondents felt that the eradication of BVD would mean an increase in herd health:

- 'Increased productivity of all cattle, reduced calf losses and increased calf growth. Overall increase in cattle health and welfare'
- 'Better health status on farm'

40% of respondents felt it would have a positive effect on the marketability of Isle of Man stock.

- 'The potential higher health status of Manx cattle gives them better sales potential'
- 'Increased health status of Isle of Man cattle will stand us in good stead'
- 'Increased animal performance, potentially increased profitability, possible marketing edge for live breeding exports, and maybe marketing point for manx meat?'
- 'the Isle of Man has an opportunity to build a name for itself as a disease free island, increasing trust in Manx products'
- '...opens up the door for selling high health breeding heifers'
- 'Beneficial to overall economy'

Other recurring themes were:

- Increase in productivity (28%)
- o Increase in profitability (24%)
- Increase in welfare (12%)

Question 4: Are you content with the current testing programme and if not what would you like changed and why?

current testing programme and if not what would you like changed and why?



Of the 25 respondents, 19 stated they were content with the current testing programme, 5 were not content and 1 did not answer this question.

76% of respondents are content with the current testing programme and gave the following reasons why:

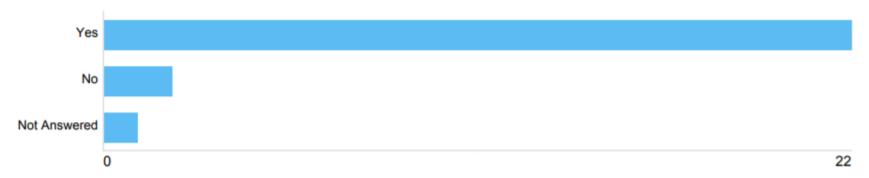
- 'It is an efficient and cost-effective method. The calves have to be tagged and this is the easiest and least stressful method, one handling does all'
- 'Current testing programme has achieved what many other areas have struggled to achieve. We know the BVD status of nearly every animal'
- 'The scheme is easy to follow and results are clear. The allowance for retest is fair and means that we can be certain of an accurate status'
- 'Eartag skin test very good. Results returned within days'
- 'Yes works well, it's just the few PIs that are still on farms that put the rest of the Island's Livestock at risk'

20% of respondents are not content with the current testing programme and gave the following reasons why:

- 'It's another cost to the farmer when times are hard to make a profit on cattle'
- 'The only issue that I have ... is the requirement to re-test within 42 days if that is required. As the movement restrictions of such animals is already covered in other regulations, it could be required that the animals are re-tested as soon as possible but no later than 6 months after the re-test is notified as being required. The difficulty with the current requirement is that if the calves have already been moved off to summer grazing then this presents difficulty in handling for re-tagging until weaning. This is now particularly relevant as ADS penalties can be imposed if not re-tested within the 42 days'.

Question 5: Are you in favour of making the culling of PIs compulsory? This measure would need to allow a reasonable time period for re-sampling of suspect animals to confirm that they are PIs

Are you in favour of making the culling of PIs compulsory?



Of the 25 respondents, 22 stated they were in favour of making the culling of PIs compulsory, 2 were not in favour and 1 did not answer.

88% of respondents are in favour of making the culling of PIs compulsory:

- 'Sooner removed from national herd the better for all'
- 'The obvious next step'

8% of respondents did not agree:

• 'Compulsory culling would only lead to farmers feeling bullied by DEFA'

A suggestion was received to encourage keepers to cull PIs:

• 'A percentage deduction in ADS payment per animal might help though'

Question 6: If culling of PIs is made compulsory do you think that owners should be eligible for compensation?

If culling of PIs is made compulsory do you think that owners should be eligible for compensation?



Of the 25 respondents, 12 stated they did not think owners should be eligible for compensation, 11 were in favour of compensation and 2 did not answer.

Of the respondents who felt owners should <u>not</u> be compensated, 20% highlighted that removing the PI would have its own financial benefit to the herd:

- 'The farmers that have acted responsibly and disposed of their PIs have not had compensation. So the few that are left should not be rewarded for putting the rest of the industry at risk'
- 'This penalises the members of the Island's farming community who have already voluntarily engaged fully with the scheme including the voluntary cull of PIs'
- 'Owners would get financial benefits from removing infected animals'

A suggestion was received to aid removal of the PI animals instead of compensation:

'waive the Fallen Stock [collection] fee'

Question 7: If compensation for culled animals were to be payable how might such a scheme work including how much do you think would be a suitable amount and would decreasing the payment rate over time speed up culling?

32% of respondents reiterated their feelings for 'no compensation':

- 'Compulsory slaughter and financial penalties would have a faster effect then compensation on the eradication of BVD'
- 'No compensation fined for not being responsible for the welfare of their livestock'

20% of respondents felt a scale 'decreasing in value' might work well:

• 'available in first 4 weeks then decrease to half for 2 weeks, then none'

Others (8%) recommend the use of a Valuer to determine 'market value':

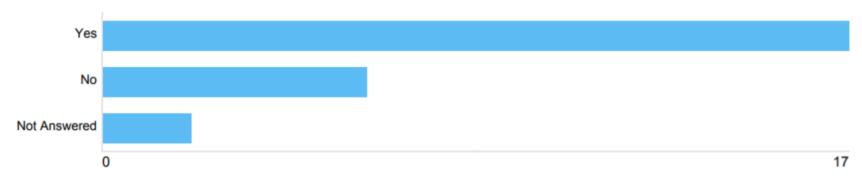
- 'compensation should be paid on the market value of the animal'
- 'valuation from Central Marts or an Independent [valuer]'

Statements regarding suitable amounts included:

- '£50 per calf'
- '£200 per head'

Question 8: As soon as infection is suspected (first non-negative antigen result received) the animal could be isolated from the rest of the herd e.g. by housing in a separate airspace. Are you in favour of introducing a new requirement to isolate virus positive animals?

Are you in favour of introducing a new requirement to isolate virus positive animals? Radio buttons



Of the 25 respondents, 17 stated they were in favour of introducing a new requirement to isolate virus positive animals, 6 were not in favour and 2 did not answer.

68% of respondents were in favour, with comments highlighting:

• 'It's in the best interest of everyone and other animals that they should be isolated and where they have been is disinfected'

12% felt 'biosecurity' was important and that 'further education' would be of benefit.

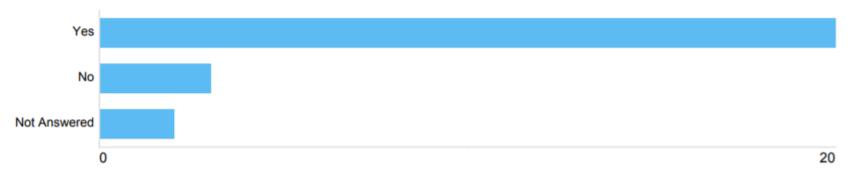
Some concerns were raised:

- What if farm has no other isolation area?'
- 'Yes however due to the logistical setup of some holdings this may not be possible without government support grants for extra housing'.
- 'But I would also like to see education on how to effectively isolate animals, including guidance on thorough disinfection, changing clothes etc before dealing with other stock'

36% felt that it would be 'impractical in reality' with 12% stating 'welfare concerns for cow & calf'.

Question 9: Are you in favour of extending restrictions for moving cattle OFF holdings which have infected animals, from just the current BVD 'positive' animal to all cattle on the holding (except direct for slaughter)?

Are you in favour of extending restrictions for moving cattle off holdings having infected animals to all cattle on the holding (except direct for slaughter)?



Of the 25 respondents, 20 stated they were in favour of extending restrictions for moving cattle off holdings having infected animals to all cattle on the holding (except direct for slaughter), 1 respondent was not in favour and 4 did not answer.

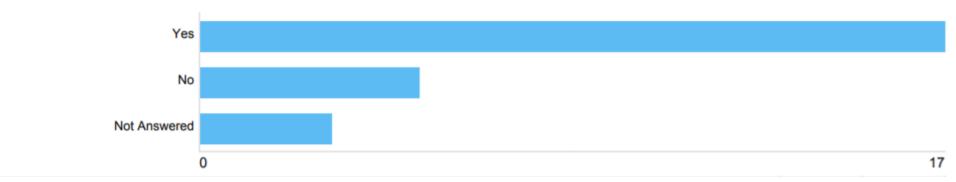
80% of respondents were in favour, stating reasons such as:

- 'Yes as it would minimise [the] chance of contamination from any infected animals to herds which have made an effort to eradicate the disease'
- 'Yes, if a farm has a suspect PI the whole farm and every animal that has come into contact with the PI or waste from that PI is a potential carrier. Including people even walking on public footpaths, farm machinery, visitors to the farm, delivery vehicles, livestock wagons, post vans'

'Minimising the risk to other farms' as an 'important next step' was highlighted by 8% of respondents.

Question 10: If the movement restriction were to be extended to include all cattle on the Holding would you be in favour of the restriction lasting for 3 – 6 weeks after the removal of infected animals to give time for residual infection to die down?

If the movement restriction were to be extended to include all cattle on the Holding would you be in favour of the restriction lasting for 3 – 6 weeks



Of the 25 respondents, 17 stated they were in favour of extending restrictions for moving cattle off holdings having infected animals to all cattle on the holding (except direct for slaughter), 5 were not in favour and 3 did not answer this question.

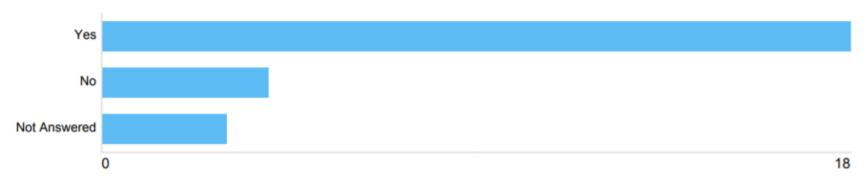
Statements included:

- 'Health status is very important for the welfare of the animals and the future viability of the industry'
- '6 weeks would possibly cause problems if all cattle were included esp[ecially] producers wishing to sell store cattle or dairy replacements at certain times of year'
- 'The risk of moving pregnant cattle carrying a PI remains. Such cattle should be restricted for 9 months following removal unless vaccinated prior to service'
- 'it is possible that the reactor was born dead'

8% of respondents felt that the restriction should be placed on a 'case by case' basis.

Question 11: A way to potentially evade such additional restrictions would be by submitting samples late. Are you in favour of imposing movement restrictions for holdings that are late in submitting samples until negative test results are received by the Department?

submitting samples late



Of the 25 respondents, 18 stated they were in favour of imposing movement restrictions for holdings that are late in submitting samples until negative test results are received by the Department, 4 were not in favour and 3 did not answer this question.

72% of respondents were in favour, comments included:

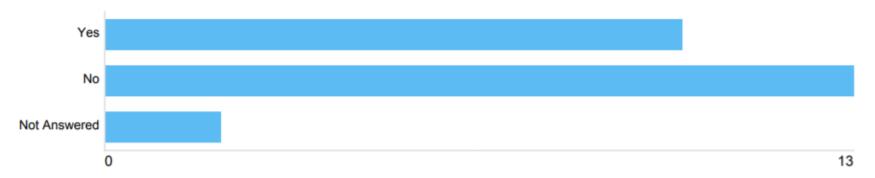
'The test results come back very quick now only a few days. I didn't know you were able to submit samples late?'

16% were not in favour, statements included:

- 'Late submission is never intentional. The animals cannot be moved anyway as they are unknowns'
- 'No movement restrictions should apply'

Question 12a: Preventing the movement of cattle onto an infected holding would reduce the risk of additional animals being infected. Are you in favour of introducing a prohibition of cattle movements on to a Holding containing PIs or test positive animals?

reduce the risk of additional animals being infected



Of the 25 respondents, 13 stated they were not in favour of introducing a prohibition of cattle movements on to a Holding containing PIs or test positive animals, 10 were in favour and 2 did not answer this question.

52% of respondents did not want to see a prohibition of moving animals on to a Holding containing PIs, their comments included:

- 'Restrictions on cattle moving onto the holding could have financial implications for holders which have fully complied with all BVD restrictions and best practice'
- 'If the animals moving on are at the holdings risk then the risk is taken by that farm business and should not be regulated. As long as movement off that holding is regulated for an appropriate time following the outbreak'

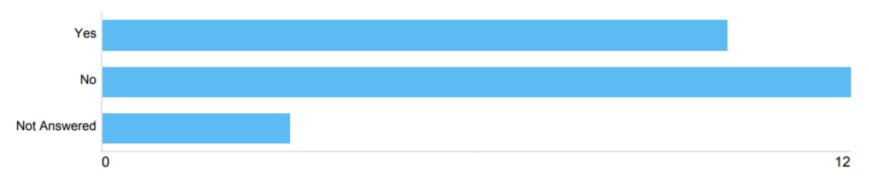
Further concern was raised:

• 'A positive test at suckler sale time might do a lot of harm to a business'

12% felt it should be the 'farmer's decision'.

Question 12b: Should moves on to the BVD-infected holding be permitted, but limited to animals that have been vaccinated against BVD by a veterinary surgeon?

limited to animals that have been vaccinated against BVD



Of the 25 respondents, 12 stated did not think that moves on to the BVD-infected holding be permitted and limited to animals that have been vaccinated against BVD by a veterinary surgeon, 10 were in favour and 3 did not answer this question.

48% of respondents highlighted the following concerns with vaccinations by a veterinary surgeon:

- 'No, because again it causes a financial penalty to innocent farmers, it should be the responsibility of the infected holding to
 ensure the animals are vaccinated and compliant with the BVD regulations and best practice'
- 'This may confuse or complicate the message; simple message should be to remove PIs'
- 'Difficult to implement'

Amongst the 40% of respondents in favour commented:

• 'Using one shot live vaccine so can be confident of protection'

'Over the top' and **'financial penalty**' were views expressed by 8% of the respondents.

Question 13: If virus positive animals must be housed, how could inadvertent spread of BVD virus to other cattle via clothing/footwear/equipment be prevented?

36% of respondents felt that 'biosecurity' was critical to control the spread of BVD.

28% felt that 'more education' was needed about biosecurity and the spread of BVD:

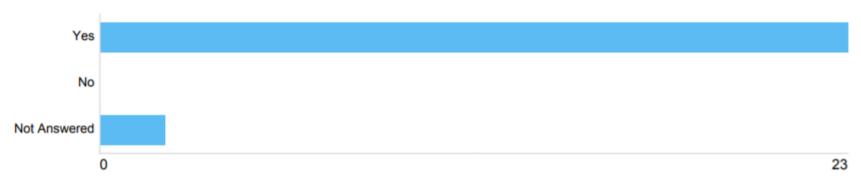
- 'Education about the benefits of biosecurity measures and how they can be applied appropriately'
- '... more information is required on disease spread, virility, transmission and longevity of this disease. It's not easy to beat a virus!'
- 'education on good bio-security'

20% felt it was '**very difficult**' to prevent the spread of BVD:

- 'Very difficult to prevent, and very difficult to enforce prevention measures'
- 'It can't, and it doesn't. Why is a whole herd not [a]ffected when they all share the same field?'

Question 14: Should more use of biosecurity be encouraged, e.g. through guidance rather than via legislation?

Should more use of biosecurity be encouraged



Of the 25 respondents, 23 agreed that more use of biosecurity should be encouraged and 2 did not answer this question.

Statements included:

- 'Not enough information is relayed to the entire farming industry in a practical way that they can relate too'
- 'Guidance to improve awareness of the routes and risks of spread would be beneficial'
- 'A heavy hand achieves nothing guidance and a cooperative attitude is far better'

Suggestions included:

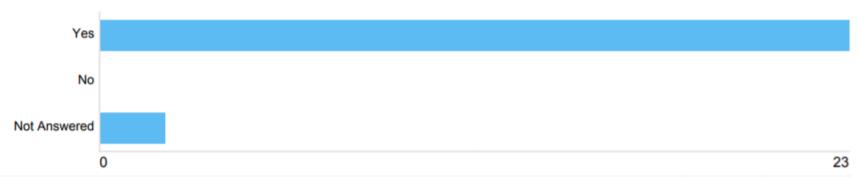
- 'Practical workshops at holdings including a "Mock-up" isolation / quarantine situation to demonstrate the best practice would be a great way to show how simple changes can protect the industry'
- 'The government needs to support this through the provision of grants though because increasing biosecurity is expensive and many farmers do not currently have the disposable income to support this'

Concern was raised:

• 'Public Footpaths spread lots of diseases. Farmers have NO control over who, or when people and people with dogs go from farm to farm, they do not disinfect their feet or sign in to say they have been on the land or in some cases been though the farm yard'

Question 15: Are you in favour of requiring pre-importation testing of all cattle?

Imported animals present a major risk of re-introduction



Of the 25 respondents, 23 agreed that cattle should be pre-import tested and 2 did not answer this question.

92% of respondents were in favour, commenting:

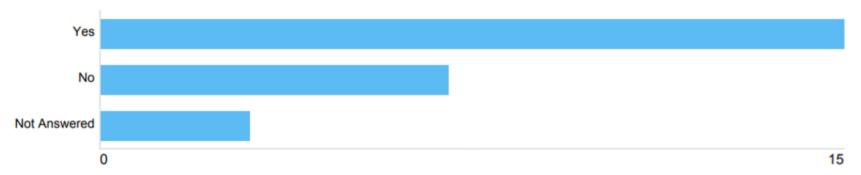
- 'The current 'tissue test' tags are easy to use and you generally have the result with[in] a week. So I do not see a problem with this as you have to go through other processes to import anyway'
- 'Easier not to bring in than to have to dispose of once here and the added costs'
- 'This should be on all import health certificates'
- 'Need to keep out the disease once we get free of it'

Concern was raised:

• '... don't think you can test the calf in a pregnant animal so that could still be infected. Needs to be in isolation at calving until calf has had a clear tag test'

Question 16: Are you in favour of extending the period of time that imported cattle are required to be isolated on farm for from 10 days to 21 days?

isolated on farm for from 10 days to 21 days



Of the 25 respondents, 15 were in favour of extending the period of time that imported cattle are required to be isolated on farm for from 10 to 21 days, 7 did not agree and 3 did not answer this question.

60% of respondents agreed, stating:

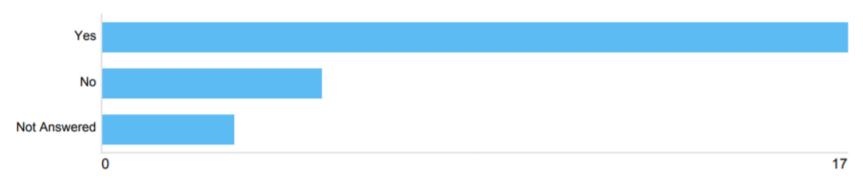
- 'Reduce the risk of any imported stock spreading any infection or disease to other stock'
- 'As long as the isolation is effective! If epidemiology shows that imported cattle are not the source of the infection then this should be reduced'

Some concern was raised:

- 'Often difficult to isolate for longer periods'
- 'Not always safe isolating a beast on its own, can lead to it becoming agitated and dangerous over a period of time would be better to test prior to entry into Island'

Question 17: Are you in favour of requiring cattle imported within the last 9 months (that are not Antibody negative) to be calved in isolation and retaining such calves in isolation until tested negative?

isolation until tested negative



Of the 25 respondents, 17 were in favour of requiring cattle imported within the last 9 months (that are not Antibody negative) to be calved in isolation and retaining such calves in isolation until tested negative, 5 did not agree and 3 did not answer this question.

68% of respondents were in favour, however, concerns were raised on the practicalities:

- Yes ideally but only if facilities on farm allow it'
- 'Although I feel this would be a good idea it would be difficult and potentially extremely financially prohibiting to ensure and the fact that any PI's would have to be killed anyway would hopefully minimise this effect'
- 'The risk is on the farmer, whilst it is probably good practice to isolate imported calving cows, this is not always practical. Plus without further, regular on-farm inspections I fail to see how this point could be anything more than guidance on good practice. The importer has to take responsibility and be aware of the risks'
- 'Not always possible, do you think we have endless empty sheds waiting to be used'
- 'Practically impossible to isolate on farm situation'

Question 18: Are you in favour of compulsory testing of older animals of unknown BVD status?

compulsory testing of older animals



Of the 25 respondents, 21 were in favour of compulsory testing of older animals of unknown BVD status, 2 did not agree and 2 did not answer this question.

84% of respondents were in favour and commented:

- 'Yes, would tighten the net on the PI's and also give reassurance to herd owners that they are completely free from the disease'
- 'In my opinion this is long overdue knowing the status of the entire national herd allows us to properly implement BVD control'
- 'Thought this had been done surely this is an absolute basic necessity'

24% felt this was 'long overdue' with 8% commenting that knowing the status of the older animals would 'provide reassurance'.

Question 19: Are you in favour of the compulsory re-testing of positive animals if they are still alive three weeks after initial testing to clarify if they are transiently or persistently infected?

compulsory re-testing of positive animals



Of the 25 respondents, 19 were in favour of the compulsory re-testing of positive animals if they are still alive three weeks after initial testing to clarify if they are transiently or persistently infected, 4 did not agree and 2 did not agree.

76% of respondents were in favour, stating:

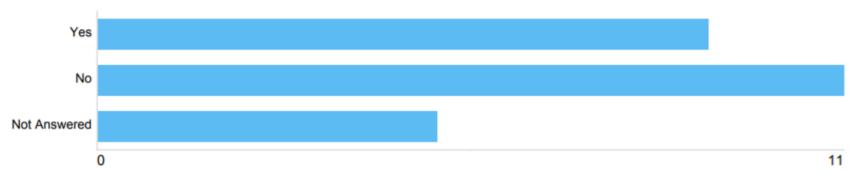
- 'I believe anything still alive 3 weeks after an unknown or positive test should be retested to prove its status and if it's infected it should be killed'
- 'Yes, if they have tested positive then there is an issue within the herd. All positives should be destroyed if they pose a risk'
- 'This would give us important information regarding the epidemiology of the disease on the island. If we can identify that animals are TIs then we know there must be an unknown or uncontrolled source of infection'
- 'Yes, do not want to cull unnecessarily'

Some concerns were raised:

• You try and retest an animal out in the field, it causes unnecessary stress to the herd and risk to the farmer '

Question 20: Where a virus positive animal is re-tested to establish if transient or persistent infection should the re-test be limited to a blood sample taken by private veterinary surgeon or is it acceptable for the keeper to re-sample using a management tag?

keeper to re-sample using a management tag



Unfortunately, respondents experienced difficulty with the wording of this question. They understandably found it difficult to answer Yes/No to a question which gave a choice of options.

Of the 25 respondents, 11 did not agree, 9 agreed and 5 did not answer this question.

Those in favour of using a management tag commented:

- 'No, if management tags [are] giving correct results then reuse. No added unnecessary costs'
- 'No, if there's no faith in the second button tag result then why should there be faith in the first, be it positive or negative'
- 'A vet's call out fee is £50 before they have even got out of the car. It is unreasonable to expect farmers to bear these costs.'
- 'The result should be the same. Cheaper to use a Tag'
- 'Either is acceptable and we acknowledge that tags are generally faster than blood tests'

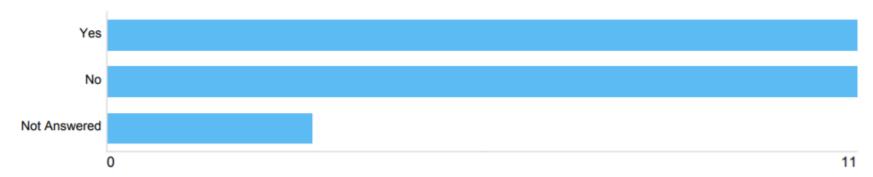
Some saw benefits in using a private vet:

- 'Yes, should also be an opportunity for the vet and farmer to discuss BVD'
- 'At this stage in the programme compulsory testing by a vet would be beneficial to reduce the risk of fraud'

20% felt the use of a private vet was an 'unnecessary cost'. 12% felt that using a private vet would 'reduce potential fraud'.

Question 21: Are you in favour of the timescale for submission of samples to an approved laboratory being shortened to one week?

approved laboratory being shortened to one week



Of the 25 respondents, 11 were in favour of the timescale for submission of samples to an approved laboratory being shortened to one week, 11 were not in favour and 3 did not answer this question.

This question split the votes, those not in favour commenting:

- 'In theory but it is not always easy dealing with suckler cows and sometimes the cows need to settle after calving before they are safe to deal with'
- 'Danger and difficulty of tagging suckler calves would put unnecessary pressure on farmers'
- 'No, [im]practicality in sucklers particularly as details can be slow to get if the animals are particularly wild'
- 'No way it's hard enough at the busy times of year to try and make the time to get the samples and forms filled out and sent to be putting more pressure on the farmers'

36% felt it was '**impractical'** to shorten the timescale.

One suggestion was received:

• '7 days is not long going by at calving time why not try a 14 day window?'

Question 22: Are you in favour of the Department being able to have further analysis of samples performed?

further analysis of samples performed



Of the 25 respondents, 22 were in favour of the Department being able to have further analysis of samples performed, 1 was not in favour and 2 did not answer this question.

88% were in favour, commenting:

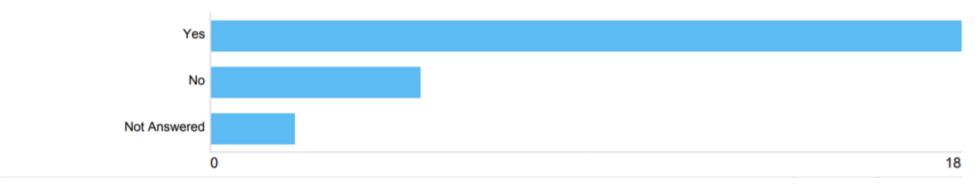
- 'Yes, makes sense. If more information can be gained from the sample for no extra cost, then if this information help[s] to control the disease, then I don't see any downside to this'
- 'Anything to inform us on epidemiology is helpful in targeting controls. This will also be helpful on the world stage as other countries may use the Isle of Man as a case study in developing their own control strategies'

12% were concerned that any cost involved should not be passed to the farmer:

'As long as no extra cost'

Question 23: Are you in favour of extending the information available on the location of holdings that have contained animals that had tested BVD virus positive from the current 6 weeks to one year?

information available on the location of holdings



Of the 25 respondents, 18 were in favour of extending the information available on the location of holdings that have contained animals that had tested BVD virus positive from the current 6 weeks to one year, 5 were not in favour and 2 did not answer this question.

72% were in favour, stating:

- 'The information available is too vague at the moment to prevent the spread of the infection'
- 'This would allow better monitoring of the disease by Manx farmers although it should maybe have a traffic-light system so not to overly penalise the holders who actively kill PI's within a short period compared to those who hold on to them'
- 'Again this is sensible and protects people who are engaging with the BVD control scheme. The date that any PI animal was
 identified should be made part of the information available to allow informed decisions to be made regarding the status of the
 farm'

Concern was raised about the impact this could have:

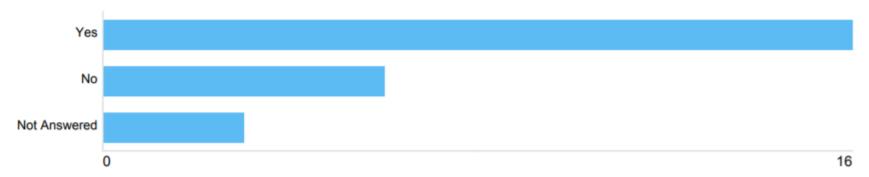
• 'If I was unfortunate to have a PI born on my holding through no fault of my own and I relied on selling cattle to mart or privately, no one would touch my cattle for a year or until I was clear this could potentially finish a business'

8% felt 'one year is too long'. One suggestion was received:

• 'I would have thought 9 month[s] would have been enough time to clear?'

Question 24: Where the tissue tag has failed to produce a sample that is suitable for BVD testing, should management tags be allowed for retesting or should the animal be re-sampled by a private veterinarian i.e. blood tested?

should management tags be allowed for retesting



Unfortunately, respondents experienced difficulty with the wording of this question. They understandably found it difficult to answer Yes/No to a question which gave a choice of options.

Of the 25 respondents, 16 were in favour, 6 were not in favour and 3 did not answer.

Comments in favour of management tags included:

- 'Don't see a problem with it as current'
- 'Management tag should be sufficient if there has been an issue with the first tag test'
- 'If it is only an unknown it should be allowed to be retagged to clarify its status as sometimes the tag can be at fault so it would be unfair for the farmer to have to pay for it to be retested by the vet'

Concern was raised:

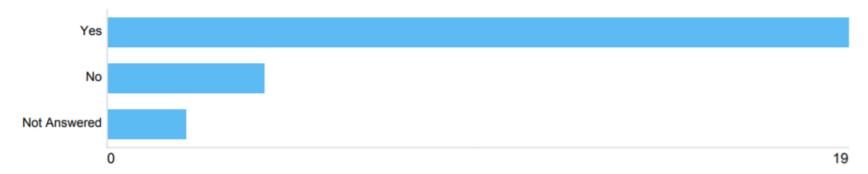
• 'However, please consider the stress and risk involved in retesting. It's easy for the office worker to make up the rules. They don't have the cost and risks to contend with. You try approaching an animal in a field away from the farm and getting it to stand still while you remove the first tag and retag it whilst trying not to be attacked by the mother'

Those in favour of utilising a private vet commented:

- 'allowing tissue from a management tag leaves the process subject to fraud'
- 'maybe on farms that have positive tests, [they] should be tested by vet for retest'

Question 25: Would you agree that management tags used for BVD tissue sampling must be printed with the animal's official identification number?

BVD tissue sampling must be printed with the animal's official ID number



Of the 25 respondents, 19 agreed that management tags used for BVD tissue sampling must be printed with the animal's official identification number, 4 did not agree and 2 did not answer.

Whilst 76% agreed, concern was raised that this may delay the retesting process:

• 'All of the official birth identification test tags should have the official number but tags for retests should just have a number to speed up the retesting process and also the speed up the pre-importing testing. Also management tags are for management purposes not official purposes'

Conclusions

The consultation attracted responses from a number of IOM cattle keepers, IOM private vets, other IOM taxpayers as well as UK-based BVD vaccination companies – therefore views were given from a broad range of experiences.

The responses showed that the vast majority of respondents were in favour of taking the BVD strategy forward towards eradication and found the proposals for the next phase of the BVD Scheme broadly acceptable.

Further education surrounding BVD, its spread and the importance of biosecurity was highlighted. Along with ensuring any proposed changes had minimal impact on the practicalities of day-to-day farming, especially within the suckler beef herds the issue of minimising costs to farmers (of any changes) was also raised.

The Directorate's next steps will be to take these views into account to further develop the implementation of the policy on progressing towards BVD eradication including legislative requirements.

Animal & Plant Health
Department of Environment Food & Agriculture
5 February 2018