



ICSA observations on the draft TB strategy

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General Comments

It is clear that there is a gulf in viewpoint when it comes to the objective of TB eradication between the Department (DAFM) and farm representatives.

The draft TB strategy documents further underlines that. However, ICSA believes that the TB Forum is an important mechanism to achieving an agreed programme and it is in that context that we are submitting the following comments in relation to the draft TB strategy.

Ultimately, ICSA believes that a comprehensive agreement that fairly accommodates both the Department proposals and the critical need to ensure fair play for all farmers is the only way forward.

A sound strategy must be based on fair play for all farmers and a recognition that full and accurate compensation is the essential foundation of success. Academic research is important, but we are talking about the livelihoods of our members here and the TB Forum must proceed on the basis that a minority of farmers are expected to carry unfair costs.

Detailed response to the Draft TB Strategy

Preventing spread from herds with a high risk of recurrence & enhanced actions to clear infection from extended breakdown herds.

These relate to recommendation number 6 which is “increased focus on herds which require enhanced support due to their disease history”.

ICSA agrees that there is a need for enhanced support for herds that have had a long and difficult TB experience. However, the term “enhanced support” is not analogous with provisions such as imposing a 30 day pre-movement test.

However, ICSA would consider discussing a pre-movement test of 60 days limited to very specific cases of herds that have had severe and recurring TB outbreaks, provided that there is a satisfactory conclusion to the outstanding questions relating to compensation and a commitment to fully confront the role of wildlife. In particular, ICSA wants to see an end to the half-hearted engagement with the deer problem, especially having regard to research (UCD/DAFM) confirming the link between bovine

TB and TB in deer in Wicklow. ICSA has strongly maintained that the strategy for TB cannot be agreed unless there is a much more robust approach than that which pertains at present.

ICSA is not satisfied that DAFM can continue to assume that failure to research TB in deer on a more widespread basis across other counties is evidence that there is “nothing to see here”. Equally, the DAFM approach of saying it’s up to farmers to seek licences to shoot deer is completely at odds with the objective of eliminating TB. It is not fair nor reasonable to berate farmers for avoiding hard choices when the deer problem provides a clear example of DAFM looking to take the soft option.

In addition, the refusal of Coillte to properly fence its lands to ensure deer do not encroach on adjoining farmland is unacceptable. A TB strategy which is built around providing the state with strong powers to impose restrictions and even penalties on farmers should ensure that Coillte is not allowed to be a bad neighbour. Farmers are particularly incensed at the long history of portraying them as the problem, encapsulated by the contentious advert from the 1980s – “the neighbour who doesn’t give a damn; know him for what he is.” Unfortunately the neighbour who doesn’t give a damn in 2020 is an agency under the aegis of DAFM.

Other proposals under this section include a detailed investigation to identify and remove all sources of infection; the use of additional targeted tests to identify infected animals and progressive removal of animals deemed to be higher risk.

ICSA accepts that these proposals have merit. There is evidently a need to use other testing methods in addition to the skin test due to its imperfections and it is logical that this should be utilised in problem herds. ICSA believes that DAFM should be open to trialling new methods of TB detection in addition to the use of the gamma interferon blood (GIF) test.

ICSA also wants the views of a herd owner - who believes that whole-herd de-population is necessary - to be accepted in most cases, where the TB breakdown is proving intractable.

ICSA is very concerned about proposals to align compensation with undertaking risk mitigation measures and this needs further debate before any attempt to implement it.

Addressing the risk from inconclusive animals (TB Forum Recommendation 9)

ICSA accepts that GIF testing inconclusives or allowing the farmer to choose to cull such animals is appropriate. However, there it is also necessary to accept that an animal which was an inconclusive several years ago and which has subsequently passed more than one annual skin test and the GIF should then be discounted as a risk in the case of herds which are otherwise TB free.

Action plans for areas with increased localised TB levels (TB Forum Recommendations 3 and 12)

ICSA accepts the need for specific action plans for areas with localised TB outbreaks. Again, the need to tackle all wildlife factors including deer must be part of this. Whereas contiguous testing is often unpopular, there is a need to examine in greater detail the specific circumstances of contiguous herds. For example, is the TB outbreak linked to the arrival of cattle on rented land from a herd located a significant distance away? What about the case of feedlots which are contiguous? Should there be more stringent restrictions in such cases?

Aligning with changes in the EU Animal Health Law TB Regulations

This imposes a considerable new burden of cost and inconvenience on farmers, arising from the pre-movement test for animals/ herds not tested in the previous six months. ICSA disagrees with the necessity of this but it will be interesting to examine what it achieves. If the hypothesis is correct, it should lead to a noticeable improvement in the TB figures. This should be analysed carefully and results made available to the TB forum.

Reducing the risk posed by badgers (TB Forum Recommendation 4)

ICSA does not accept that vaccinating badgers is an acceptable alternative to culling programmes where there are disease outbreaks. ICSA believes there is need for more research and analysis. Particular problems have been observed with disturbance of badgers arising from infrastructure projects such as motorways. ICSA wants to see a greater proportion of badgers tested for TB at culling and more research into how effective vaccination programmes can be, given the difficulty of reaching all badgers and identifying the badger populations at risk. Do we have a precise figure for the badger population of each county?

Reducing the risk posed by deer (TB Forum Recommendation 4)

See above.

Tailored, simplified communications on TB Eradication Programme between DAFM and herdowners (TB Forum Recommendations 1 & 8)

ICSA does not accept that the herd risk categorisation letters sent out to herd owners were in accordance with what was agreed at the TB forum. The letters went well beyond stating how long the herd was clear and branched into recommendations on specific animals which clearly has the potential to devalue such animals. Moreover, information provided on specific animals which had been bought in provided the potential to analyse confidential information about other herds. The consequence of this is substantial in terms of devaluing other herds and possibly breaching GDPR regulations.

ICSA deplors this because it went far beyond what was agreed at the TB forum especially as it was clear that herd categorisation and the provision of sensitive details in any public manner has been a contentious issue at the TB forum.

The provision of information on biosecurity and other general information on TB spread is not a problem provided that individual herds or animals are not devalued. If the long-term strategy is to categorise animals or herds and to make this information available to other farmers, then this cannot possibly be considered unless there is an agreed policy of compensation and the availability of funding to cover this

Stakeholder Ownership and Involvement / Standardised RVO meetings (TB Forum Recommendations 10, 2, 11)

ICSA supports the strategy here. It is important that there is a precise clarification of the decision making process at the TB Forum. Where it comes to contentious issues, it is not acceptable that state agency representatives are treated as stakeholders. Instead, the role of representatives who are not directly impacted financially should be as advisors rather than as stakeholders.

In addition, seats were allocated to individual farmers who do not have any mandate. The farmer representation on the TB Forum should be strictly limited to recognised social partner farm organisations. Bi-lateral meetings were an important element of the TB Forum and should continue to be part of the process.

The establishment of 2 technical working groups is a welcome development, provided that there is adequate farmer representation on both. The selection of a chairman should not happen without consultation with the farm bodies. The precise mandate of each working group should be agreed at the TB forum before work commences.

Improved DAFM TB Breakdown Communication (TB Forum Recommendations 1, 2 & 8)

A key element is that DAFM delivers a single point of contact arrangement for herdowners experiencing a breakdown. It is very frustrating to have to deal with various officials and at times, be unable to contact relevant people or get answers to queries or representations. Each farmer should also be able to nominate a farm organisation representative who would also have access to a single point of contact.

There should be one single contact for each county who is able to liaise with the farmer/ farmer representative and get quick answers from all DAFM officials including veterinary officers.

Financial Aspects of the TB Programme

The ambition for agri-food expansion set out in successive strategies by DAFM (Food Harvest, Food Wise etc) is not feasible without implying additional costs for the TB programme. It is absurd to imagine that the plan to go from €10 billion of agri-food exports to €19 billion (currently at €14 billion) could be achieved without consequential increases across many areas of cost, including obviously the TB programme. If the state is not prepared to handle the additional costs of the TB programme, it should not deliberately promote expansion programmes.

But of course, the increase of €4 billion in agri-food exports in recent years provides a substantial benefit to the exchequer and it is unacceptable that farmers who have delivered this are then expected to pay a price even though the exchequer has gained.

ICSA has asked for a breakdown of how DAFM expenditure on the programme. The latest breakdown of expenditure is €34 million for DAFM which has risen significantly from €26 million. Financial supports to farmers at €21 million are significantly less than they contribute through testing, levies and own labour.

ICSA awaits the cost/ benefit analysis with interest. In our view there is a potential for DAFM staffing costs to be excessively allocated to the TB programme given that even in the absence of TB, there would be a requirement for some level of DAFM vets and officials in animal disease control.

ICSA believes that cost control needs to be fully explained also. We have made points regarding the cost of officials sitting in marts to find information which is readily available elsewhere, and also to question whether on-farm visits could be considerably reduced. Covid has demonstrated that further savings are possible with online meetings.

ICSA also believes that the prices paid by meat factories in respect of reactors is an unacceptable rip-off of the state and that DAFM needs to take a more aggressive approach in ensuring that meat factories are not profiteering on this. ICSA also wants to see a more streamlined weekly agreement with meat factories to ensure prompt removal of reactors from farms.

This is critical not just from the point of view of cost saving for DAFM but also in the context of a fair and agreed compensation programme. In our view, the outgoing TB Forum has unfinished business

regarding the various compensation elements. DAFM has been unfairly restrictive in relation to hardship / depopulation / income supplement grants (no off-farm income for hardship; whole month payment and other restrictions for income supplement/ depopulation). On the other hand, ICOSA questions the financial efficiency of the appeals process being over-used by DAFM and whether it is cost effective to fight over peanuts.

ICOSA also wants to ensure that independent valuers are left to do their job and that compensation ceilings are significantly amended in the case of breeding stock.