

Bovine Viral Diarrhoea (BVD)- Consultation Questions

Q1. What is your name?

Q2. What is your email address?

Q3. Are the views and opinions in your response personal or expressed on behalf of an organisation?

- Personal**
- Organisation**

If the views and opinions expressed are on behalf of an organisation please provide name of organisation below.

Q4. Please indicate if you are happy for your response to be published.

- Yes**
- No**

Q5. If you are responding on behalf of an organisation, please indicate if you are content for the name of your organisation to be associated with your response.

- Yes**
- No**
- Not applicable**

If you answered yes, please provide your organisation's name in the box below.

Q6. Do you agree with the proposal to introduce herd restrictions as a disease control measure for BVD in Northern Ireland?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

The compulsory BVD Programme, administered by AHWNI, has been operational for over six years and since its introduction, while there have been excellent levels of compliance with the requirements by herd owners, initial decreases in herd and animal level incidence have not been sustained. This is believed to be due to transmission of the BVD virus within herds and between herds (both contiguous herds and purchasing herds), as well as possible identity fraud surrounding some BVD Positive calves.

The BVD Implementation Group, chaired by AHWNI, has been requesting that DAERA introduce measures that would address these issues, measures including herd restrictions in certain BVD breakdown herds and additional restrictions on movements of pregnant stock, to reduce the risk of the BVD virus being transmitted between herds. Industry's aim has been that BVD should be eradicated at the earliest opportunity using a short and sharp Programme.

Progress in the ROI accelerated three years into their Programme, due to the introduction of herd restrictions in conjunction with other measures including financial supports and biosecurity notifications. Given the similarities in Programme design and farming practices, it is anticipated that BVD herd restrictions in NI should also lead to a significant improvement in the progress of the scheme.

Herds with positive animals

Q7. Do you agree that the Department should restrict movements from herds that retain BVD positive animals?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

Herd restrictions should be applied initially to herds that retain BVD Positive animals. Cattle that are Persistently Infected (PI) with the BVD virus shed the virus every day of their lives and thus present an ongoing risk to other cattle in their herd, neighbourhood and other herds with which cattle or people (from the infected herd and premises respectively) have contact.

As BVD incidence falls, the time from disclosure of a BVD Positive result in a herd until the application of herd restrictions should be reduced to the point where herd restrictions are applied immediately when it becomes apparent that the BVD virus has been circulating in a herd. The disclosure of a BVD Positive result indicates that the animal is presenting a risk to other cattle in that herd and potentially in other herds.

It makes sound economic sense for farmers to cull PIs, as these animals have a negative impact on herd health and herd profitability. In addition, any measures that will encourage farmers to deal with BVD infection more quickly will have a benefit to society, due to environmental gains in terms of reduced GHG emissions and due to public health benefits that will accrue due to the reduced use of antimicrobial medicines.

Q8. Do you agree that herd restrictions should be applied to all herds that retain positive animals, irrespective of herd size or herd nature?

- Yes
- No

Please provide any comments you wish to make to support your response, in box below.

The ability of the BVD virus to move between cattle transcends herd size or herd nature: any bovine animal may be susceptible to the BVD virus (aside from those with natural or vaccinal immunity obviously) therefore powers are needed to allow application of herd restrictions to any affected herd.

When a BVD herd restriction is applied to a herd, the BVD restriction should be apparent on APHIS/ NIFAIS. As a corollary, it is important that a live BVD herd status (equivalent to BVD-free, BVD-free-pending or BVD-withdrawn) should be assigned to each herd electronically (in addition to information provided to the herd owner through the post), so that there is transparency for herd owners in knowing the current BVD status of their herd when they check online.

Q9. Do you agree that herd restrictions should apply to herds 'associated' with the herd containing the positive animal, i.e. herds that are kept, managed or housed with the herd that has the positive animal?

- Yes
- No

Please provide any comments you wish to make to support your response, in box below.

Associated herds should be regarded as being one epidemiological unit. Where BVD virus is found in one herd, any associated herds will have a very substantial risk of having the virus present as well. Therefore, it is essential that associated herds are restricted at the same time as the breakdown herd. The BVD virus may be transmitted to the associated herd directly through cattle to cattle contact or indirectly by the transfer of contaminated material on equipment, clothing or at facilities used in common such as cattle crushes. The virus could have originated in the associated herd so it is appropriate that it should be restricted and advice given to check cattle for BVD (for example, untested cattle).

As for Q8, it is important that a live BVD herd status should be assigned to each herd electronically.

Q10. Do you think there should be a ‘grace period’ before herds with a positive BVD test results are restricted, to allow herd keepers time to retest or remove PI animals?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

From the disease control perspective, to stamp out the BVD virus herd restrictions should be applied to clamp down on movements at the point when the Positive result is returned.

However, it is accepted that to introduce herd restrictions after a period of notice will allow these changes to bed in and for the farming industry to adapt to them until the policy becomes established.

Q11. If so, do you consider 28 days an appropriate initial ‘grace period’?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

As stated in the answer to Q10, the aim should be to quickly move to immediate restrictions, as happens in Scotland and the ROI. However, if a grace period is to be given, then 28 days is the maximum length for which it should last. After a BVD Positive (BVDP) result is returned, farmers have the option to retest at 21 days from tag application. With a current median laboratory turnaround time (at 21/11/2022) of 1 day, if results are returned within 4 days of the eartag being applied (and therefore the grace period starts at that point), if follow up testing is carried out 17 days later and retest results returned within a further 4 days, then 21 days would be an appropriate initial ‘grace period’.

Farmers can take the decision to cull BVDPs immediately, thus avoiding BVD herd restrictions.

If a grace period is introduced, DAERA should, for the period that it exists, be willing to inspect all BVD Positive animals in that window to ensure that their isolation is satisfactory.

Q12. Do you agree that the 28-day ‘grace period’ should be reduced within one to two years so that eventually herd restrictions would be applied immediately, following a positive BVD result?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

The 28-day grace period should be reduced before one year. Its reduction could be commensurate with the fall in the rolling 12-month herd incidence and also with the number of herd restrictions having to be applied. Industry has wanted to have a short,

sharp eradication Programme and it is within the gift of most farmers to avoid the risk of BVD entering their premises, therefore any grace period should be ended before Spring 2024 (that is, before the spring calving season would commence in that year, so as to have the maximum impact at the earliest point).

Q13. Do you agree that no movements should be permitted into a restricted herd, apart from exceptionally under licence issued by the Department?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

There are times when it would be appropriate to allow particular movements of cattle under licence into a BVD breakdown herd, such as the movement of a breeding bull, or a replacement animal. These occasions should be rare and should be considered on a case-by-case basis.

Q14. Do you agree that no movements should be permitted out of a restricted herd, apart from moves to slaughter, for disposal as an animal by-product or exceptionally, under licence issued by the Department?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

There are times when it would be appropriate to allow particular movements of cattle under licence out of a BVD breakdown herd. As for Q13, each movement should be assessed individually before a licence is granted.

Q15. Are there any other moves that you think should be allowed out of or into a restricted herd?

Yes

No

If so, please provide details.

The movement of a bovine animal for welfare reasons or for treatment by a veterinary surgeon should be allowed under licence in exceptional circumstances. Such movements should only take place after a private veterinary surgeon has advised on the case.

Q16. What do you think of the Department's proposals regarding the lifting of herd restrictions?

Please provide any comments you wish to make to support your response, in box below.

One aim of herd restrictions is to reduce the risk of the BVD virus being transferred to cattle on other farms. Given that transient infection can occur in cattle that were BVD Negative at birth, efforts must be made to contain the circulation of virus from breakdown herds via

transiently infected animals. If BVD Positive cattle have been isolated promptly after disclosure, the risk of spread of infection from that point will be reduced. Any contact by the BVD Positive animal, either directly or indirectly, with other cattle may potentially have set up a transient infection which should have cleared by the three-week point. However it is possible that infection could spread from one group of transiently infected cattle to another naïve group. Herd restrictions should remain in place for a minimum of three weeks; four weeks would be preferable from the disease control perspective.

Any untested cattle in a breakdown herd may act as an undiagnosed reservoir of infection. It is very important that all such are tested (with a Negative result) before the herd restriction is lifted. It is reasonable to allow 27 days from birth for the return of a BVD result. This measure will encourage herd owners to take action to establish the BVD status of all cattle in their herd, including untested imported cattle, all newborns and those that have had unsuitable sample results returned.

Q17. Do you agree with the Department's proposal to impose restrictions on breeding age females in the herds restricted because of positive animals?

Yes

No

Please provide any comments you wish to make to support your response, in box below

It is essential that breeding age females are restricted in herds where BVD Positive animals are present, as there is a risk that circulation of the virus on the farm could lead to the persistent infection of developing fetuses where infection of the dams takes place within the critical window of susceptibility (ie between the first and fourth months of pregnancy). As no testing options exist to allow the BVD status of the developing foetus to be established directly, the options presented allow reassurances to be given, by either waiting for the calf to be born and tested, or allowing one of two testing strategies to be undertaken.

Overall only a small number of herds should be impacted by the restrictions. In most dairy and many suckler herds, females over 12 months of age are retained for breeding and production in the herd, therefore restrictions on breeding age females in these herds will not significantly affect the farm business. Any breeding animal that is tested and does not pass the testing criteria may be regarded as a potential Trojan animal and therefore permission should not be given for it to be moved from the herd.

Q18. If breeding females are restricted, under what other circumstances, do you consider that restrictions should be removed?

Please give reasons for your answer.

We agree with the circumstances under which restrictions should be removed as outlined in the consultation, that is, under the options to test the resulting calf from the pregnancy; or to establish immunity prior to breeding; or to establish the lack of exposure of the dam.

See the response to Q17: no testing options exist to allow the BVD status of the developing foetus to be established directly, the options presented allow reassurances to be given, by either waiting for the calf to be born and tested, or allowing one of two testing strategies to be undertaken.

If there are welfare or veterinary reasons for moving an animal from a premises, then the licence should indicate precisely how the pregnant animal is to be isolated in any new premises until a Negative result is received from her subsequent calf. It is critical that any such isolation is inspected on a risk-based and regular basis by a DAERA official.

If a pregnant cow under restriction aborts or produces a stillborn calf, the aborted foetus/ stillborn calf should be BVD tissue tag tested, with a Negative result, and the dam should be virus tested using a blood sample, which must also return a Negative result, before she is allowed to move.

Herds with inconclusive animals

Q19. Do you agree that the Department should restrict movements out of herds that retain BVD inconclusive animals?

- Yes**
- No**

Please provide any comments you wish to make to support your response, in box below.

The chance of a BVD Inconclusive animal returning a Positive result on retest is significantly higher than that for a previously untested animal. The BVD status of these animals must be resolved, given the risk that they present, so it is appropriate that herd restrictions should be applied. The proposed measures will encourage the timely retesting of the BVD Inconclusive animals.

Q20. Do you agree that restrictions on herds with retained BVD inconclusives should apply to associated herds?

- Yes**
- No**

Please provide any comments you wish to make to support your response, in box below.

The possibility exists that the animal with the BVD Inconclusive result is infected with the BVD virus therefore it is appropriate that any associated herds, which constitute one epidemiological unit with the breakdown herd, should also be restricted.

As per the response to Q9: Associated herds may be regarded as one epidemiological unit with the herd containing the BVD Inconclusive (BVDI) animal so it is necessary that they are restricted at the same time as the BVDI herd. The BVD virus may be transmitted to the associated herd directly through cattle to cattle contact or indirectly by the transfer of contaminated material on equipment, clothing or at facilities used in common such as cattle

crushes. The virus could have originated in the associated herd so it is appropriate that it should be restricted and advice given to check cattle for BVD (for example, untested cattle).

As for Q8, it is important that a BVD herd status should be assigned to each herd electronically.

Q21. Do you think there should be a 'grace period' before herds containing animals with inconclusive test results are restricted, to allow herd keepers time to retest and if necessary, remove PI animals?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

In line with the response to Q10 above.

From the disease control perspective, to stamp out the BVD virus, herd restrictions should be applied to clamp down on movements at the point when the Inconclusive result is returned.

However, it is accepted that to introduce herd restrictions after a period of notice will allow these changes to bed in and for the farming industry to adapt to them until the policy becomes established.

As stated in the answer to Q10, the aim should be to quickly move to immediate restrictions. However, if a grace period is to be given, then 28 days is the maximum length for which it should last. After a BVD Inconclusive result is returned, farmers have the option to retest at 21 days from tag application. With a current median laboratory turnaround time (at 21/11/2022) of 1 day, if results are returned within 4 days of the eartag being applied, follow up testing is carried out 17 days later and retest results returned within a further 4 days, then 21 days would be an appropriate initial 'grace period'. Farmers can take the decision to cull BVDIs immediately.

Q22. Do you agree with the Department's proposals regarding movements in and out of herds restricted because they retain inconclusive animals?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

There are times when it would be appropriate to allow particular movements of cattle under licence into a BVDI herd, such as the movement of a breeding bull, or a replacement animal. These occasions should be rare and should be considered on a case-by-case basis.

Also, there are times when it would be appropriate to allow particular movements of cattle under licence out of a BVDI herd. As for Q13, each movement should be assessed individually before a licence is granted.

Q23. Do you agree with the Department's proposals regarding the lifting of restrictions for herds that retain inconclusive animal(s)?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

The aim of herd restrictions is to reduce the risk of the BVD virus being transferred to cattle on other farms. Given that transient infection can occur in cattle that were BVD Negative at birth, efforts must be made to contain the circulation of virus via transiently infected animals. If BVDI cattle have been isolated promptly after disclosure, the risk of spread of infection from that point in time will be reduced. Any contact by the BVDI animal, if it is infected, either directly or indirectly, with other cattle may potentially have set up a transient infection which should have cleared by the three-week point. However it is possible that infection could spread from one group of transiently infected cattle to another. Herd restrictions should remain in place for a minimum of three weeks, although four weeks would be preferable from the disease control perspective.

As any untested cattle in a breakdown herd may be an undiagnosed reservoir of infection, it is very important that all such are tested (with a Negative result) before the herd restriction is lifted. It is reasonable to allow 27 days from birth for the return of a BVD result. This measure will encourage herd owners to take action to establish the BVD status of all cattle in their herd, including untested imported cattle, all newborns and those that have had unsuitable sample results returned.

Herds with unknown status animals

Q24. Should the Department be able to restrict herds retaining animals whose BVD status is unknown?

Strongly Agree

Agree

Neither Agree or Disagree

Disagree

Strongly Disagree

Please provide any comments you wish to make to support your response, in box below.

The Department should have the ability to restrict herds retaining cattle whose BVD status is unknown because of the potential reservoir of BVD infection in these animals and therefore because of the risk of undiagnosed virus circulating in the herd and potentially moving out of the herd.

Herd owners have 27 days from a calf's birth in which to apply eartags, obtain an ear tissue sample and submit the sample for BVD testing. Within the proposal of a separate 28-day window consequent to DAERA informing a farmer of the requirement to test their BVDU cattle, there is adequate time to have an initial test carried out or a repeat test carried out on an animal where the test result indicates that a test could not be carried out or the sample was unsuitable.

The possibility of restrictions being imposed in non-compliant herds is likely to encourage compliance with the legislation.

Q25. Do you agree that restrictions placed on herds with retained BVD unknowns should also be applied to associated herds?

- Yes
- No

Please provide any comments you wish to make to support your response, in box below.

As per questions 9 and 20,

The possibility exists that the untested animal is infected with the BVD virus therefore it is appropriate that any associated herds, which constitute one epidemiological unit with the BVDU-retaining herd, should also be restricted.

Associated herds may be regarded as one epidemiological unit with the herd containing the BVD untested cattle so it is necessary that they are restricted at the same time as the BVDU-retaining herd. The BVD virus may be transmitted to the associated herd directly through cattle to cattle contact or indirectly by the transfer of contaminated material on equipment, clothing or at facilities used in common such as cattle crushes. The virus could have originated in the associated herd so it is appropriate that it should be restricted and advice given to test the appropriate cattle for BVD.

As for Q8, it is important that the BVD herd status should be assigned to each herd electronically.

Q26. What criteria do you consider the Department should consider when deciding whether to restrict herds which retain BVDUs?

Please give reasons for your answer.

Measures to drive down BVDU numbers, including the implementation of an abattoir ban, have had very limited success. DAERA figures demonstrate that many herds are ignoring the legislation and repeated requests to test such animals. The reservoir of infection in BVDU animals is concerning and the failure to test these cattle is a hindrance to Programme progress.

Herds that retain BVDUs should be restricted according to the level of risk that they present. While every BVDU animal presents a BVD risk, those in herds that have had BVD infection recently (eg in the previous two years) present a greater risk. Furthermore, the risk-based approach should be undertaken using the number of BVDUs present that were born in a defined time period, for example, the previous two years, and also the total number of BVDUs present in a given herd.

Given that a grace period is supported, from the disease control perspective all herds that have non-compliant animals should be restricted after the grace period, as industry's aim is to stamp out BVD completely. Any herd restriction applied as a result of animals being

present with a BVDU status can be reversed in a very short space of time and with little cost to the farmer per animal.

Q27. Do you think there should be a ‘grace period’ before herds retaining BVDUs are restricted, to allow herd keepers time to test and, if necessary, remove PI animals?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

Herd owners should be given a grace period so that opportunity to test the BVDU animals is given as the introduction of herd restrictions after a period of notice may be more palatable to the farming industry until the policy becomes established. From the disease control perspective, all herds that have non-compliant animals should be restricted after the grace period, as industry’s aim is to stamp out BVD completely. The herd restriction can be reversed in a very short space of time and with little cost to the farmer per animal.

As per Q24, herd owners have 27 days from a calf’s birth in which to apply eartags, obtain an ear tissue sample and submit the sample for BVD testing. Within a separate 28-day window consequent to DAERA informing a farmer of the requirement to test their BVDU cattle, there is adequate time to have an initial test carried out or a repeat test carried out on an animal where the test result indicates that a test could not be carried out or the sample was unsuitable.

It is in the power of herd owners to avoid herd restrictions in a BVDU-retention situation by ensuring their cattle are tested. The purpose of herd restrictions in this consultation is a disease control measure that increases the likelihood of infection detection thereby allowing improved infection control, particularly as we drive the BVD virus to extinction.

Q28. Do you agree with the Department’s views regarding movements in and out of herds restricted because they retain BVDU animals?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

Herds should be fully restricted, to prevent the risk of BVD infection leaving the herd and moving to other naïve herds. There are times when it would be appropriate to allow particular movements of cattle under licence into a BVDU-retaining herd, such as the movement of a breeding bull, or a replacement animal. These occasions should be rare and should be considered on a case-by-case basis.

Also, there are times when it would be appropriate to allow particular movements of cattle under licence out of a BVDU-retaining herd. As for Q13, each movement should be assessed individually before a licence is granted.

Q29. Do you agree with the Department's views regarding the lifting of any restrictions that might be imposed on herds that retain BVDU animal(s)?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

We agree that restrictions should be lifted when Negative results are returned for all BVDUs over 30 days of age in the herd.

Herds with untested 'pre-2016 animals'

Q30. Do you think that there should be a legal requirement to test those animals born, or brought into a herd, before 1 March 2016 which currently have no BVD status?

Yes

No

Please provide any comments you wish to make to support your response, in box below.

There should be a requirement for the BVD status of every bovine animal in NI to be established, so that farmers can take steps to cull PIs, thereby stamping out the BVD virus at the earliest opportunity and ultimately achieving BVD freedom.

Impact Assessments

Q31. Do you have any comments to make in relation to the Regulatory Impact Assessment and its conclusions, or any additional information to inform the impact/cost on farmers?

Please provide any comments you wish to make in box below.

We agree that the implementation of herd restrictions will give impetus to the potential reduction of trade barriers. Additional costs have been imposed on farmers due to additional veterinary certification requirements.

Non-monetised costs have been documented for farmers but not for the veterinary profession. Regular visits to carry out the euthanasia of cattle on clients' farms results in a toll for the veterinary profession.

Q32. Do you have any comments to make in relation to the Equality Screening document or the Rural Needs Impact Assessment and their conclusions?

Please provide any comments you wish to make in box below.

The psychological impact of ongoing BVD infections in herds on farmers and their veterinary surgeons has not been sufficiently noted in the Rural Needs Impact Assessment.