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24<sup>th</sup> August 2022

### **Consultation on the compulsory Bovine Viral Diarrhoea (BVD) eradication scheme**

Following internal consultation with its twelve County Branches, the Farmers' Union of Wales submits the following comments for your consideration.

#### **Specific Consultation Questions**

##### ***Question 1: Do you agree that BVD presents a problem for the farming industry in Wales?***

BVD is a viral infection of cattle which can cause a variety of significant and costly health and welfare issues for infected stock. The reduced reproductive performance and increased premature culling of stock infected with BVD make this viral disease one of the most economically important diseases of cattle in Wales. BVD infection has a costly recovery period and may result in significant decreases in milk production and growth in infected herds. According to Gwaredu BVD, infection with the BVD virus costs the Welsh cattle industry around 5 million pounds per annum through lost productivity.

According to data obtained from the voluntary RDP funded Gwaredu BVD programme, around 28 percent of cattle herds in Wales are infected with BVD. Despite significant in-roads in tackling this disease, BVD levels in Wales remain stubbornly high and this disease continues to represent a significant threat to the health, welfare and productivity of cattle in Wales.

FUW members therefore agreed that BVD presents a problem for the farming industry in Wales.

##### ***Question 2: Do you agree that BVD eradication will improve the health and welfare of Welsh cattle?***

Infection with BVD can result in a plethora of symptoms which are wide-ranging and which may be subclinical for significant periods before individual animals display clinical signs. The health and welfare issues associated with BVD infection include weakening of the immune system, scours, pneumonia, mucosal disease and reproductive problems including infertility, early embryonic death, abortion and birth defects. Infection with BVD may make cattle more susceptible to other diseases such as salmonellosis and coccidiosis and cattle with BVD may be prematurely culled for other infections without receiving a diagnosis of BVD infection.

Alongside the complex suite of BVD symptoms mentioned above, animals persistently infected with BVD (PI animals) can develop a fatal form of the disease known as mucosal disease. Mucosal disease occurs when PI cattle are infected with a more virulent strain of BVD and clinical signs include

erosions and ulcers on the mouth and intestinal tract, profuse diarrhoea, anorexia and wasting. Mucosal disease creates significant welfare issues in infected stock and mortality rates are high.

Given the health and welfare implication of BVD infection, FUW members agreed that eradication of this viral disease will inevitably improve the health and welfare of Welsh cattle by reducing the level of infected stock.

**Question 3: Do you agree that eradication of Bovine Viral Diarrhoea (BVD) will benefit Welsh cattle keepers?**

BVD has long been recognised as one of the most economically significant endemic diseases of cattle in Wales. Annual estimates on the costs of infection with this pestivirus to a 100-cow beef farm are £4,500 and for a 130-cow dairy farm, £15,000. As discussed previously (see Question 1) the reduced reproductive performance and increased premature culling of stock infected with BVD make this viral disease one of the most economically important diseases of cattle in Wales. For farms with a positive BVD status, eradication of BVD should improve farm profitability and sustainability by reducing avoidable production losses. In addition, given that the level of BVD infection in the Welsh cattle herd represents a significant threat to both infected and uninfected herds, the protectionist approach proposed through a compulsory eradication programme functions to help safeguard BVD free herds from a costly BVD incursion.

It is of note that several European countries have already engaged in successful BVD control programmes through the genesis of a legislative approach. Indeed, Sweden, Finland, Norway and Denmark have now effectively eradicated BVD whilst countries such as Austria and Switzerland have also established successful eradication programmes. Furthermore, Scotland, Ireland and Northern Ireland have had various forms of BVD legislation in place for many years and several FUW members commented that Wales has lagged behind in this regard. The control – and subsequent eradication of BVD – is essential to protect the status of the Welsh cattle industry as a world leader in livestock health and welfare.

Given the above, FUW members agreed that this disease presents a significant problem for the farming industry and that the eradication of this virus will be of benefit to both individual cattle keepers and to the reputation of the Welsh sector as a whole.

***Question 4: Do you agree with the introduction of legislation to support the eradication of BVD from Wales?***

The majority of FUW members generally agreed that legislation was essential to enhance and build upon those in-roads made by the current voluntary Gwaredu BVD scheme. At present, around 83% of cattle herds in Wales have engaged in the RDP funded Gwaredu BVD scheme and members believed that legislation was required to encourage participation in BVD eradication amongst more reticent cattle keepers. Given that funding for free screening and PI hunts under Gwaredu BVD will end on the 31<sup>st</sup> December 2022, it is essential that there is a smooth and immediate transition towards legislation in order to ensure that current momentum is maintained.

BVD is maintained in cattle herds by Persistently Infected animals (PIs). Since the onset of Gwaredu BVD in 2017, around 940 PI animals have been identified in Wales. PIs excrete large volumes of BVD virus throughout their lifetime and are the main route of infection in other stock. Identifying and removing PI animals remains the crux of BVD eradication schemes; both nationally and at a farm-level. It is therefore worthy of note that the voluntary nature of the Gwaredu BVD scheme has led to an inconsistent approach to PI management on farms; with many being sold or retained on farm. At present, there are no restrictions on the movement of PI animals or their herd and several FUW

members commented that this was a significant obstruction to BVD eradication in Wales. Without the enforcement inherent in a legislative approach it is difficult to foresee how BVD eradication could be achieved.

However, notwithstanding the above, the FUW requires clarity on several aspects of BVD legislation which have not been fully addressed within the present consultation. Areas where the FUW seeks further information are outlined in subsequent sections (see Questions 5, 7, 9 and 15). Thus, whilst the FUW is supportive of the principle of legislation for BVD control, this support requires a favourable resolution on several issues to ensure that the legislation proposed is not overly burdensome and that the costs of compliance are proportionate.

***Question 5: Do you agree that legislation imposing requirements for mandatory regular BVD screening is necessary to eradicate the disease?***

Members generally agreed with the legislation requiring herds to annually screen for BVD. The FUW notes the proposal to continue with annual testing as per the current Gwaredu BVD scheme. Several FUW members commented that, for their specific businesses, tissue tagging and testing would be preferable to a young stock screen and queried whether this type of testing could be seen as equitable to blood testing under the proposed legislation. Several members commented that the use of tag and test can add value to stock by demonstrating BVD freedom in calves, stores and bulling heifers.

The FUW notes that full implementation of the compulsory scheme may be preceded by a 3 to 6 month transition period. According to the consultation, this transition period aims to give keepers sufficient time to arrange a BVD screen for their herds and remain compliant with scheme requirements. During the transition, “*cattle may only be moved from holdings [unless to slaughter] that hold an antibody negative status for BVD, obtained during the voluntary phase*”. In addition, the consultation states that the legislation will require all cattle keepers to annually screen for the BVD virus “*within 12 months of their previous voluntary screen*”. The FUW would highlight that around 17% of cattle keepers have yet to formally engage with the national BVD programme and it is essential that such cattle keepers are able to easily and readily access BVD screening during the transition period. The onset of legislation in January 2023 should be the mechanism needed to engage the proportion of that 17% yet to identify their BVD status. Where keepers use the transition period to screen their herds for BVD, the FUW believes that cattle should also be able to be moved from such holdings if a negative BVD result is recorded.

***Question 6: Do you agree that cattle from a herd with positive BVD status, that test positive, should have their movement restricted, unless that movement is to slaughter?***

Members generally agreed with this proposal.

***Question 7: Do you agree that cattle from a herd with positive BVD status, that test negative for BVD via antigen test, should not be permitted to leave the holding where they are based unless they obtain a pre-movement negative antigen test within 21 days of the move?***

Compared with many other infectious diseases, the diagnostic tests for BVD are highly accurate and will detect almost 100 percent of PI animals (e.g. McDougall, 2021). Whilst the FUW recognises that negative animals within a positive status herd are at risk of transient BVD infection, it is important to identify the real risk posed shortly after testing has occurred in order to ensure that the legislation proposed is both proportionate and workable. The cost-benefit and the trade-off between the economic and social consequences of a given policy must be considered in equal measure to the benefits relating to eradication and control. Given the above, the consultation lacks any evidentiary support for the

pre-movement day deadline proposed in the consultation and the FUW would welcome more clarity on this issue.

Further clarity is warranted as it remains unclear from the present consultation whether cattle testing negative for BVD via the antigen test would be able to move off the holding immediately following that test result; without the need for an additional pre-movement test. Given the extremely low risk of a movement off the holding shortly after a clear test, the FUW believes that it would be highly inappropriate to require an additional pre-movement test at this stage. Similarly, it would be incongruous to require cattle testing positive to the annual surveillance screen, that subsequently test negative via the antigen test 21 days later, to be subject to a pre-movement test if the move off the holding occurs within a few days of the negative antigen test.

Several members suggested that animals with a clear test should be allowed to move off the holding without the need for a further test in the following 60 days due to the accuracy of the test and the relative risk presented by such stock. The use of a 60 day window is much clearer than the proposal in the current consultation, is akin to that permissible under bovine TB regulation and consequently simplifies the regulatory requirements.

In addition to the above, members also commented that the requirement for a pre-movement test within 21 days of the move will undermine confidence in BVD testing and screening results by undermining the perceived accuracy of the test amongst cattle keepers.

In addition to the above, it is also unclear from the present consultation whether animals could move between different herds under the same ownership without the need for additional testing. This is a significant omission from the present consultation. The majority of FUW members opposed additional testing between holdings under the *same* management and the *same* ownership due to the increased costs and bureaucracy associated with such testing. However, several members commented that the requirement for a pre-movement test between holdings under the *same* ownership but *different* management would be appropriate and was in keeping with the legislation around TB testing.

In addition to the above, several members expressed concern relating to the logistics of organising a pre-movement test in advance of the movement and sought reassurances that there was capacity to cope with the increase in demand.

***Question 8: Cattle keepers may be required to pay for their herd screenings, PI hunts and pre-movement testing to move cattle from a BVD positive herd. Do you agree that, in principle this is a fair expectation?***

Whilst FUW members generally agreed that there should be a reasonable contribution from the Welsh Government towards the costs of adhering to BVD legislative requirements there were varied responses relating to the detail of such funding.

The majority of members believed that the costs of the annual test could be borne by cattle keepers but that funding for PI hunts should be made available by the Welsh Government. From the onset of legislation, annual screening will be an on-going cost to industry. However, the number of PI hunts – and thus the funding required for such hunts – should diminish as a greater proportion of Welsh cattle farms achieve BVD negative status. Funding PI hunts early in the legislative programme would help to facilitate eradication and would provide protection for all cattle herds by funding the identification of those animals most responsible for disease transmission. Members supporting this proposal believed it to be a sensible and fair approach to funding which is directed towards those cattle keepers that have the disease in their herd.

Notwithstanding the above, several members commented that the costs of the annual test should be borne by the Welsh Government as the majority occur at the same time as the TB test; thereby minimising costs.

The third proposal mooted by FUW members was that Welsh Government should provide funding for both annual screening and PI hunts and that such funding could be tapered on a sliding scale as the legislative programme continues. Members supporting this section of the proposal believed that this would provide the best circumstances for timely eradication.

***Question 9: Do you agree that legislation imposing requirements for mandatory PI isolation is necessary to eradicate the disease?***

Given the significance of PI animals in the spread of BVD, numerous members queried the availability of the option to isolate the animal indefinitely from the rest of the herd and believed that the option of isolation should be removed in favour of compulsory slaughter only or compulsory slaughter within a set short timeframe.

Notwithstanding the above, several members commented that many cattle keepers would not have the space or facilities to meet the requirements of PI isolation.

Members noted the requirement for companion animals and no comments were forthcoming.

The FUW notes that, as part of the isolation requirements for PI animals, such animals may not be transported with other cattle. The FUW would seek a clear derogation to this requirement that allows PI animals to be transported with other stock if all cattle in the vehicle are moving straight to slaughter. The FUW does not believe it appropriate to require separate transport for PI animals under such circumstances.

***Question 10: Do you agree that farms should have the BVD status of their herds and individual animals (where their herd status is BVD positive) made securely available to other keepers via the Multi Species Wales online portal at the time of purchasing cattle?***

Members' responses to this proposal were mixed. There were significant and legitimate concerns about the creation of a two-tier market when using information at point of sale and the potential for stock to be devalued despite being clear tested for the disease. Whilst the FUW is not opposed to risk based trading *per se* the union continues to express concern about proposals which artificially inflate the disease risk posed by some stock. Discussions surrounding informed purchasing must recognise the resultant detrimental effects conferred upon some herds and it is therefore imperative that the real risk posed by stock is properly and thoroughly communicated to buyers.

The FUW notes the assertion by Welsh Government that the BVD information provided at point of sale will allow '*cattle keepers buying cattle to view the BVD status of a herd they are buying from*'. The ethos behind informed purchasing is to provide '*awareness and responsible purchasing*' to '*reduce the spread of the virus and movement of infected animals*' and ensure '*only healthy animals are brought into ...herds*'.

The FUW would query the informed purchasing criteria proposed and would also question the real disease risk posed by a clear tested animal from a BVD positive herd which is either moved shortly after the surveillance test or with a pre-movement test. Given the purported accuracy of the current tests used to identify both herd-level and individual animal BVD status, confidence in the testing regime should erode the need for BVD information to be provided at point of sale under a compulsory legislative requirement. Under the legislation, only BVD clear tested animals are able to move to

market and such stock are not – nor ever can be – PI animals. Indeed, members commented that there was the real potential for the information to be misinterpreted or misunderstood and that clear tested cattle from BVD positive or ‘clearing herds’ would be devalued under the proposals. The FUW would use this opportunity to state that cattle from clear tested herds may be sold at market with a clear status at point of sale despite the potential for almost 12 months to have elapsed since the clear test result. Whilst the FUW would fundamentally oppose moves to place additional requirements on clear tested herds, such comparisons highlight the difficulties inherent in risk based trading and further discussion on this issue are therefore well warranted.

Such concerns are especially pertinent given the lack of proposals in the present consultation to deal with cattle moving from England to be sold in Wales. It is unclear how the BVD status of these animals will be displayed and members were concerned that this is a weakness in the current proposals. Indeed, the FUW remains concerned that informed purchasing will function to devalue Welsh cattle when compared to their English counterparts by artificially elevating the risk of BVD antigen clear animals from BVD positive herds; this is despite such herds engaging in a potentially expensive programme of PI removal without compensation. It is therefore imperative the Welsh Government take note of the Unions previous comments pertaining to funding for annual screens and PI hunts (see question 8). In addition, any lack of informed purchasing at GB level will undoubtedly lead to the demise of local markets as affected cattle keepers chose to sell their stock across the border.

Notwithstanding the above, the FUW notes the proposal to make herd BVD status and the antigen results of individual animals accessible to other cattle keepers via EIDcymru and agrees that this is an appropriate portal for such information. Given that the information is being provided solely to facilitate informed purchasing, the FUW would oppose any moves to widen the audience able to access this information.

***Question 11: Do you agree keepers that breach the requirements of the proposed compulsory scheme should be liable to penalties?***

Members generally agreed with this approach with the caveat that the penalties should be proportionate to the risks conferred.

***Question 12: Are you involved with cattle keeping?***

The Farmers’ Union of Wales is a member organisation formed to protect and advance the interests of those who derive an income from Welsh agriculture. The FUW is the independent voice for Wales’s family farms and our democratic and local structure means that union members influence FUW policy and are at the core of the union.

***Question 13/14: We would like to know your views on the effects that a BVD eradication scheme for Wales would have on the Welsh language?***

The Amaeth Cymru Data and Evidence Group’s 2016 report entitled ‘Farming in Wales and the Welsh Language’ found that a far higher proportion of those in the ONS Agriculture, Forestry and Fishing employment category spoke Welsh than in any other category. Further analysis by the Welsh Government demonstrated that 43% of those in this category are able to speak Welsh.

The 43% figure compares with just 17% for all Welsh workers, meaning the prevalence of Welsh speakers in the agricultural industry is 153% higher than for Wales as a whole.

The Amaeth Cymru report also found that in communities where between 30% and 80% of the community speak Welsh, the proportion who do so within the agriculture category is significantly

higher than the overall average, and higher than for all other work types; for example, in communities where the proportion who speak Welsh is between 40% and 50%, the proportion who do so within the agriculture category is 64%.

As such, any proposals which improve the viability and sustainability of Welsh cattle businesses, farming communities or Welsh agriculture in general represent the safeguarding of an industry within which the greatest percentage of Welsh speakers is preserved. Indeed, the Iaith y Pridd report published by Farming Connect stated that family farms are a significant part of Welsh society and culture and added that they need to be protected.

The proposals contained within the present consultation aim to improve the sustainability and viability of FUW family farms and those involved in cattle supply chains by strengthening the future resilience of the sector.

***Question 15: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.***

As per the current voluntary Gwaredu BVD programme, thousands of cattle herds in Wales have achieved either bronze, silver or gold status in relation to the number of years that the herd has tested clear of BVD.

The FUW believes that the in-roads made by keepers engaging in Gwaredu BVD should be protected and it is therefore essential that the number of years a herd has been BVD free is able to be carried over into the legislative phase of the programme. This is especially pertinent given the risk based trading proposals contained within the present consultation. For ease of use and understanding, union members would prefer the current method of certification to continue.

Finally, the FUW would use this opportunity to reiterate that the union is generally supportive of a legislative approach to BVD control in Wales. However, where there are any significant changes to the legislation proposed in the present consultation, the FUW believes that the draft Order should be consulted upon.

I trust the due consideration will be given to the preceding information. Please do not hesitate to contact me pending any queries in relation to the FUW's response.

Yours sincerely,

Dr Hazel Wright, Farmers' Union of Wales Senior Policy Officer.

## **References**

McDougall, S. (2021) Effect of Calf Age on Bovine Viral Diarrhea Virus Tests. J. Vet. Diagn. Invest 33(3): 528-537. doi: [10.1177/1040638721998821](https://doi.org/10.1177/1040638721998821)