



Department
for Environment
Food & Rural Affairs

Bovine TB: Proposals to simplify surveillance testing in the High Risk Area of England and other disease control measures

A summary of responses to the consultation exercise and the government's way forward

21 December 2017

OGL

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1. Introduction

This document summaries responses to Defra's public consultation on new cattle measures to tackle Bovine TB, which ran from 19 July 2017 to 29 September 2017. Defra received a total of 300 responses to the consultation. 287 were via the Citizen Space portal and 13 were emailed to the bTB engage mailbox.

273 responses were received from individuals, including farmers and vets, and 27 were from organisations. The organisations are listed in Annex A.

A full summary of the consultation responses is included in section 3 and section 4 sets out the government's plans going forward.

Copies of responses (with the exception of those where the respondent requested that their response should not be released) can be obtained from:

Cattle Measures Team
Defra, Bovine TB Programme
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17 Smith Square
London SW1P 3JR

2. The measures

The consultation was the latest in a series aimed at introducing enhanced TB control measures in cattle that will, when combined with measures to address the TB risk posed by badgers, increase the probability of achieving national official TB freedom by the target date of 2038. The proposals set out in the consultation fell into the following broad categories:

- Streamlining and simplifying TB testing in the High Risk Area, based on default six-monthly routine herd testing
- Compensation arrangements
- TB testing costs for herds subject to more frequent testing
- Increased use of private vets to enhance the control of TB
- Sales of TB-restricted cattle
- Minor changes to the TB Order

3. Summary of responses

Streamlining and simplifying TB testing in the High Risk Area based on default six-monthly routine herd testing, with less frequent testing for lower risk herds

The proposal (1)

To introduce default six monthly routine surveillance testing of cattle in the High Risk Area (HRA), with flexibility around the timing of these tests to allow for the uncertainty on when some cattle can be moved to and from outdoor grazing.

The responses

The breakdown of responses is:

Agree – 47 % Disagree – 49% No view – 3% Not answered - 1%

This proposal was supported in principle by a number of representative groups including the National Farmers' Union (NFU), British Veterinary Association/British Cattle Veterinary Association (BVA/BCVA), National Beef Association (NBA), Livestock Auctioneers' Association (LAA) and the British Limousin Cattle Society. The potential benefit of introducing six monthly testing was highlighted by a number of respondents including the BVA/BCVA who said:

'The introduction of six monthly testing in the HRA will, first and foremost, permit the earlier identification of the disease'

A number of these groups emphasised that flexibility around the timing of the test was crucial, with the NFU saying:

'NFU members must have confidence that testing flexibility is built into the system from the start, and that it will remain a priority with APHA resourcing'

Some respondents questioned whether there would be sufficient veterinary capacity, given the seasonality of testing, whilst others highlighted concerns around the difficulties of testing cattle during the grazing season. The Forest of Dartmoor Commoners Association stated:

'The gathering of all animals for a routine herd test during the grazing period is near impossible.'

Concerns expressed by those who opposed the proposal included the additional costs and disruption for herd owners.

The proposal (2)

To extend the interval between short interval tests (SITs) from 60 to 90 days in TB breakdown herds

The responses

The breakdown of responses is:

Agree – 26% **Disagree – 69%** **No view – 4%** **Not answered - 1%**

The BVA/BCVA and Cattle Health Certification Standards (CHeCS) supported the proposal but with the caveat that the 90 day minimum period should start from the time of the completion of the previous test rather than the date any reactors are removed.

The NFU also saw the logic of extending the interval between short interval tests at the same time as introducing default six monthly routine testing. However, some NFU members are concerned that doing this would extend the length of time TB affected herds were under restriction.

80 of the 207 respondents who disagreed with this proposal did so on the grounds that that it would result in affected businesses being under restriction for a longer period. The potential financial implications for businesses was a concern for a number of respondents, including the British Limousin Cattle Society who said:

‘Prolonged intervals between tests are too disruptive to business, placing significant pressure on cash flow’.

Six respondents were concerned about potential welfare issues caused by overstocking (as opportunities for selling animals would be reduced) whilst others thought there would be minimal disease control benefits in extending the interval between tests.

Some who disagreed with the proposal were concerned that a longer interval between tests would increase the time infected cattle could spread disease within the herd.

The proposal (3)

To retain annual surveillance testing for herds in the High Risk Area which meet any of the following criteria:

- The herd has been in existence for at least 10 years and has never had a TB breakdown.

- The herd has been in existence for at least 6 years, has not had a TB breakdown in that six year period and has not had cattle from the High Risk Area added to it in the last five years.
- The herd is Cattle Health Certification Standards (CHeCS) accredited at levels 5 to 9

To allow biennial surveillance testing for herds in the High Risk Area which meet either of the following criteria:

- The herd has been in existence for at least 10 years, has never had a TB breakdown and has not had cattle from the high risk area added to it in the last five years.
- The herd is CHeCS accredited at level 10.

The responses

The breakdown of responses is:

Agree – 42 % Disagree – 41% No view – 15% Not answered – 2%

The LAA, and CHeCS whilst broadly supportive of the criteria for annual testing did not support the proposal to introduce biennial testing in the HRA. The LAA said:

‘The LAA supports the retention of annual surveillance testing for herds with a good TB history. The LAA does not support Defra’s proposal to allow any herds in the HRA to move to two-yearly testing. Testing in the HRA should not be extended past yearly.’

Overall, although a small majority were in favour of retaining annual testing for lower risk herds there was hardly any support for introducing biennial testing for the lowest risk herds. The main concern raised was the potential risk of infection remaining undetected in less frequently tested herds.

In supporting CHeCS accreditation as a criterion for determining which herds should be on less frequent testing the BVA/BCVA said:

‘... we welcome the value assigned to CHeCS accreditation, which provides a holistic assessment of risk and demonstrates a proactive responsible approach on the part of the owner.’

A number of representative organisations including the NFU, LAA, Devon Cattle Breeders’ Society and the Country Land and Business Association (CLA) either opposed or expressed concern about the principle of using CHeCs accreditation as a criterion to determine where to retain annual testing.

Compensation for replacement cattle and for cattle presented for slaughter in an unclean state and introduction of an individual animal compensation cap

The proposal (4)

To pay 50% compensation for any animal that is brought in whilst a herd is under restriction and becomes a test reactor before the breakdown is resolved.

The responses

Agree – 18% **Disagree – 76%** **No view – 5%** **Not answered – 1%**

The majority of respondents, including a number of representative organisations, disagreed with this proposal. The main arguments put forward were that farmers need to be able to re-stock to stay in business and that a reduction in compensation would have significant financial implications.

The CLA said:

‘The CLA believes this may disproportionately affect dairy farmers who are tied into contracts which dictate the volume of milk required as part of their milk contract’.

The NFU said:

‘.....this measure could place businesses in financial and contractual jeopardy’

Eleven respondents were concerned about how the proposal would impact on herds that are under restrictions for an extended period of time. The NFU and five other respondents made the point that if APHA licence the movement of animals into a restricted herd there was little justification for not paying full compensation.

The BVA/BCVA supported the proposal but felt that consideration should be given to CheCS accredited herds receiving more than 50% compensation. The BVA/BCVA said:

‘To encourage good practice and to incentive further take up of the CHeCS scheme there should be consideration given to limiting the reduction to 25% for CHeCS registered farms. Otherwise the application of a 50% reduction is appropriate to synchronise regimes between England and Wales.’

The proposal (5)

We should pay 50% compensation for cattle that cannot be processed (for human consumption) at a slaughterhouse because they are unclean.

The responses

The breakdown of responses is:

Agree – 47% **Disagree – 46%** **No view – 6%** **Not answered – 1%**

The most common reason offered for supporting this proposal was that it would help incentivise keepers to meet their important animal welfare and husbandry responsibilities.

The NBA noted:

‘The NBA TB Committee believe that the welfare of animals waiting to be removed from farm should not be compromised and the condition that they are presented in to the abattoir is an indication of the conditions they have been kept in, therefore it is appropriate to reduce the compensation for cattle presented in an unclean state’.

Some who supported the proposal did so on the understanding that more clarity would be provided on the details of how the policy will be implemented. The Dartmoor Commoners Council stated that:

‘there needs to be clarification of ‘unclean’ and documented evidence to back up any reduction in compensation’.

8 respondents supported the principle of paying reduced compensation but felt this should be less than 50% of the standard rate, or that no compensation should be paid.

Reasons put forward by those who disagreed with the proposal included: health and safety issues in relation to clipping some animals on farm (making it very difficult for some to present ‘clean’ animals); some cattle are not kept for slaughter purposes and so are not routinely belly clipped, which could affect their cleanliness.

16 respondents suggested that instead of reducing compensation, owners should instead be charged for clipping/cleaning by the receiving slaughterhouse. The NFU said:

‘...if this policy is pursued, Defra should allow cattle keepers the option to pay the slaughterhouse to retrospectively clip, thus protecting the compensation value to the farmer and receipt value to Defra’.

The NFU and CLA both suggested that Defra/AHPA could provide more guidance to farmers on the importance of keeping clean cattle.

The proposal (6)

We should introduce a £5,000 cap on compensation for any single animal.

The responses

The breakdown of responses is:

Agree – 42% **Disagree – 49%** **No view – 8%** **Not answered – 1 %**

The BVA/BCVA supported the idea of a £5,000 cap, as it would bring harmonisation between England and Wales, but wanted clarification on the specific details.

A number of respondents including the NFU, NBA and several cattle breed societies felt that a cap would have a negative impact on cattle genetics, particularly in the HRA, as industry would be less willing to invest in improving genetics. The LAA suggested that by introducing a cap:

‘... the only outcome will be to reduce the quality of genetics coming into the HRA’.

Six respondents who agreed with the proposal felt that owners of high value animals should take out insurance.

The NFU and seven other respondents had concerns about the availability of suitable private insurance in the HRA or in herds with a history of TB. The NFU said:

‘The NFU does not agree with Defra’s assumption that there is already suitable and affordable private sector insurance available to provide the gap in compensation required – we are however, willing to work with Defra and the private insurance sector to resolve this.’

TB testing costs for certain types of herds subject to more frequent testing

The proposal (7)

The operators of Approved Finishing Units with grazing (gAFUs) should receive one government funded routine test each year (or two if our proposal to simplify testing in the High Risk Area is implemented) with the required additional testing paid for by the operators.

The responses

The breakdown of responses is:

Agree – 18% Disagree – 66% No view – 14% Not answered – 2%

The BVA/BCVA recognised that by providing an outlet for restricted herds' surplus stock gAFUs provided a valuable service for owners of some TB affected herds but nonetheless agreed that:

'...further testing should then be paid for by the AFU with grazing operator, in line with the principle of shared cost between government and operator'

Representative organisations who disagreed with the proposal included the Tenant Farmers' Association (TFA), NBA, CLA, LAA, NFU, Devon Cattle Breeders' Society and the Dartmoor Commoners' Council.

19 respondents who disagreed with the proposal were concerned that gAFU operators would pass the additional cost of testing back to producers. Whereas some other respondents thought the proposal could result in units becoming unviable.

A number of respondents felt that passing more of the TB testing costs to the operators would be unfair and unhelpful given that they offer a useful trade option for owners of TB restricted herds. This was a view held by the National Beef Association Pedigree Committee who said:

'AFUs are an important pressure valve and should be supported'

The role of gAFUs in helping to support cattle welfare was also noted by seven respondents, including the NFU.

The proposal (8)

Businesses in the Low Risk Area (LRA) producing raw cows drinking milk and unpasteurised dairy products for human consumption should benefit from just one routine herd test every four years, with additional testing over and above this paid for by the business.

The responses

The breakdown of responses is:

Agree – 26% Disagree – 51% No view – 22 % Not answered – 1%

The BVA/BCVA were one of five respondents who agreed with this proposal on the basis that it is a business choice to produce raw milk products and these businesses should therefore pay for any testing over and above the default 4 yearly surveillance testing in the LRA.

18 of those who disagreed pointed out that these herds are tested more frequently for public health protection reasons, and so government should cover the cost of all testing. The CLA said:

‘Due to the health risks of selling raw milk to the public a higher level of testing above four years will be required and the CLA suggests this financial burden should not be placed upon the operator’.

The NFU argued that the beneficiary is the consumer (choosing to consume raw dairy products) rather than the producer and therefore:

‘... the current government/tax payer cost coverage of enhanced additional testing is entirely appropriate’

Extending the role of private vets to improve TB control

The proposal (9)

Suitably trained and accredited private vets should provide evidence to support APHA’s decisions on the approval of candidate Approved Finishing Units (AFUs) and applications for TB-restricted markets.

The responses

The breakdown of responses is:

Agree – 47% **Disagree – 35 %** **No view – 16%** **Not answered – 2%**

Some of those who agreed with the proposal commented that private vets often have local knowledge of farms so are best placed to provide evidence to APHA. The Tenant Farmers’ Association (TFA) said:

‘The local knowledge of private vets would improve the quality of applications’

The NFU, BVA/BCVA and the Animal Welfare Group all agreed in principle with the proposal but want to see more detailed guidance, particularly regarding training and clarity of roles. Others in support of the proposal thought there should be a robust appeals process in place.

Some who supported the proposal did so on the basis that there would be no additional cost to farmers. The NFU stated:

‘The NFU does not support the aspect of the proposal which would see the vet’s duties paid for by the farmer.’

This was a view echoed by a number of those who disagreed with the proposal.

14 respondents who disagreed with the proposal were concerned it could create a conflict of interest for private vets and potentially affect their working relationship with clients. The Dartmoor Commoners' Council suggested that the proposed function could be carried out by any suitably trained person, not necessarily a vet.

The NBA, the Herefordshire Cattle Society, British Charolais Cattle Society (BCCS) and three individual respondents all felt the proposal would introduce a level of unnecessary bureaucracy.

The LAA did not support the proposal and said that:

'... there continues to be unacceptable inconsistency between inspectors' interpretation of the rules (APHA and Local Authorities) throughout England and this proposal would without doubt exasperate this.'

The proposal (10)

Operators of Approved Finishing Units and TB restricted markets should appoint an accredited private vet to provide regular reports to APHA confirming that to the best of his/her knowledge the premises continues to meet the approval criteria.

The responses

The breakdown of responses is:

Agree – 46% **Disagree – 38%** **No view – 14%** **Not answered – 2%**

Only a very small proportion of the 137 respondents who agreed with this proposal provided supporting comments. A number of respondents, including the BVA/BCVA and NFU, submitted a single response to proposals 9 and 10.

One respondent suggested that reporting should be on an annual basis and within the existing annual herd health plan requirements under the Basic Payment Scheme (BPS) whilst another respondent suggested reporting should be on a 16-19 months basis to reduce the costs for the business operators.

Most who opposed this proposal were, as with the previous proposal, concerned by a potential conflict of interest for private vets and additional costs to business operators. The CLA said it disagreed with the proposal because:

'...it places additional burdens on units that provide a valuable service to many businesses which could become less attractive with higher costs.'

18 respondents, including the NBA, felt that responsibility for ensuring premises are meeting the approval criteria should continue to rest entirely with APHA.

The proposal (11)

A suitably qualified non-government vet should carry out an on-farm assessment to help inform APHA on restocking decisions in TB breakdown herds

The responses

The breakdown of responses is:

Agree – 47% **Disagree – 40%** **No view – 11%** **Not answered – 2 %**

There were few substantive comments from those who supported the proposal. As with proposals 9 and 10, some respondents, including the NFU, said they supported the proposal in principle but did not agree that the cost of the assessment should be met by the herd owner.

The most common reason for disagreeing with the proposal was a perceived conflict of interest between private vets and their clients, with a number of respondents saying that to ensure impartiality the responsibility for assessing applications to allow movements into a TB breakdown herd should rest entirely with APHA.

One respondent was concerned about variables in the process leading to inconsistencies in restocking decisions whilst another felt the existing re-stocking process already takes up too much time and was concerned that the involvement of a private vet could add further delays.

Delayed slaughter of in-calf TB test reactor cattle

The proposal (12)

To offer owners of TB affected cattle herds the option of retaining in-calf TB test positive animals for up to 60 days to allow calving, subject to compliance with biocontainment/isolation conditions.

The responses

The breakdown of responses is:

Agree – 71%; Disagree – 21. %; No view – 7%; Not answered – 1%

Some of those in favour attached caveats to their support. For example, the NBA and a number of cattle breed society organisations felt that the proposal could bring animal welfare benefits but highlighted the importance of ensuring compliance with robust bio-containment and isolation requirements

10 respondents supported the proposal on welfare and ethical grounds, including the TFA who stated:

'This is a basic animal welfare issue. No pregnant animals should be compulsorily slaughtered.'

Whereas some of those who disagreed with the proposal felt it would be unhelpful from a disease control perspective. The BVA/BCVA said:

'We are unable to support this proposal. There is a significant risk of transmission to healthy livestock attached to retaining an infected animal on a farm for up to 60 days'

Although the NFU had concerns that this measure could send out a confused message about the importance of eradicating TB they also felt it could provide animal welfare benefits. Therefore, the NFU suggested retaining the current option of retaining in-calf reactors for up to 28 days and offer up to 60 days only on an exceptional basis. Specifically, the NFU proposed a keeper could make a declaration on the test reading date that a reactor is in-calf and ask APHA to consider their request to take up the 60 day option.

The proposal (13)

A named private vet should be appointed by the herd owner to certify and monitor compliance with biosecurity and isolation requirements for retained in-calf reactors, providing written reports to APHA.

The responses

The breakdown of responses is:

Agree – 52%; Disagree – 32 %; No view – 14%; Not answered – 2%

The NBA, British Blue Cattle Society, and four other respondents all agreed with the proposal on the basis that the private named vet would be the farmer's own vet. The Herefordshire Cattle Society pointed out that the on farm vet would know the particular layout of the farm and be best placed to advise on how best to isolate the in-calf reactors but felt APHA should also carry out spot checks.

Three respondents agreed with the proposal provided there would be no additional cost burden for the farmer. The CLA noted:

'...concerns remain that greater and greater costs are placed upon the livestock owner already facing significant financial burdens'

A number of those who disagreed with the proposal had concerns that it could create a conflict of interest for private vets. Some respondents felt private vets should not be asked

to monitor their clients' compliance suggesting that APHA vets were much better placed to do this.

Two respondents thought the proposal was impractical whilst some others viewed it as unnecessary and bureaucratic.

Slaughter sales of TB restricted cattle in the Low Risk Area

The proposal (14)

To stop licensing sales of TB restricted cattle in the Low Risk Area from 1st January 2018.

The responses

The breakdown of responses is:

Agree – 32% **Disagree – 41%** **No view – 26%** **Not answered – 1%**

Only a few of those who agreed with the proposal included detailed comments in their response. However the BVA/BCVA felt it would have:

'...a very limited impact on industry and would provide further important support to the OTF status application for the LRA... but should be balanced against any welfare implications for transporting greater distances to slaughter.'

The Animal Welfare Group made a similar comment:

'... as long as transportation of the restricted cattle is feasible without involving journeys of excessive time we support this measure.'

5 respondents recommended that TB restricted cattle should go direct to slaughter.

A number of representative organisations including the LAA, NFU, NBA and two livestock auctioneers did not agree with the proposal. They felt that markets must comply with strict biosecurity conditions and therefore present minimal or no disease risk. The importance of sales to create competition for restricted cattle was highlighted by a number of respondents including the NBA and several cattle breed organisations.

The NFU and LAA highlighted the potential health and welfare issues if animals had to travel longer distances to an alternative red sale elsewhere in the country.

Reducing the risks from the spreading of slurry and manure from TB restricted herds

The proposal (15)

To add to the cleansing and disinfection notice issued to owners of TB breakdown herds a requirement not to move slurry or other animal waste to another holding except under a licence issued by an AHPA inspector

The responses

The breakdown of responses is:

Agree – 48% **Disagree – 41%** **No view – 9%** **Not answered – 2%**

The NBA, British Blue Cattle Society and one other respondent all support the proposal provided:

'The farm's ability to manage slurry within environmental constraints is always taken into consideration'

Some respondents agreed with the proposal on the understanding that licence applications would be given reasonable consideration and the process was simple and quick.

The LAA and a number of other respondents commented that Defra need to take into consideration the impact Nitrate Vulnerable Zone (NVZ) regulations could have on a farmer's ability to dispose of waste.

A common objection, from those who disagreed with the proposal, was that some farms have limited storage capacity so would be unable to store slurry on their own holding for six months.

Some respondents felt the proposal was impractical and overly bureaucratic. Others including the NFU thought it was disproportionate to the risk. The NFU said:

'It would be entirely disproportionate to include this requirement in respect of every TB breakdown'

The BVA/BCVA agreed that slurry should be stored for at least six months but thought that the need to apply for a licence could cause problems if/when a farmer needs:

'...flexibility to respond quickly to emergencies that may threaten the local environment or biosecurity'

Minor changes to The Tuberculosis (England) Order 2014

The proposal (16)

Owners of cattle that are compulsorily slaughtered because they are wild and untestable should be responsible for the costs of slaughter.

The responses

The breakdown of responses is:

Agree – 51% **Disagree – 34%** **No view – 14%** **Not answered – 1%**

The majority of respondents agreed with this proposal including most representative organisations, although some attached caveats. The Dartmoor Commoners' Council said there needed to be a clear definition of 'wild' and 'untestable', whilst the NFU said the categorisation of wild and aggressive is subjective and they felt if it was applied and resulted in the loss of compensation, the owner should be consulted and other options considered.

The LAA supported the proposal subject to:

'...every effort having been made to restrain the animals for testing'

The BCCS, NBA, and the British Blue Cattle Society all agreed with the proposal where cattle are repeatedly untestable but shared the opinion that:

'...random cases where a rogue animal causes disruption and escapes the holding area (and is therefore untestable) should be outside the remit of the proposal'

Seven respondents who agreed with the proposal felt that it was owners' responsibility to provide safe testing facilities.

Reasons put forward by those who disagreed with the proposal included it not being the owner's fault if an animal becomes unruly at the time of testing and the testing procedure can cause cattle to become stressed and unpredictable. Two respondents commented that it was penalising those farmers who kept cattle on commons and moorland.

4. The government's response to the consultation

Defra is grateful to those who responded to the consultation. The comments and points raised in the responses have been considered and will continue to be used to inform the government's decisions on the way forward.

At this stage, no decisions have been made on proposals 2, 4, 6, 7, 8, 9, 10, 11, 13, 14, 15 and 16. Announcements on these will be made in due course.

The government has, however, decided to introduce the measures detailed below as soon as practicable and following further detailed work on implementation and engagement with affected stakeholders.

Proposal 1 - To introduce default six monthly testing in the High Risk Area

We will introduce default six monthly testing of cattle in the High Risk Area

This will allow identification and removal of TB infected cattle more quickly. It will also remove the need for a number of unplanned, unpredictable TB tests (i.e. as the herds will be on more frequent surveillance testing) which can be particularly disruptive for cattle keepers.

We recognise that many affected herd owners will need flexibility around their testing dates. Although the current use of test date windows would allow up to eight months between tests, there will be an opportunity for a one-off adjustment of testing dates where this is necessary to reflect businesses' farming practices.

This change will not take effect until 1 January 2019 at the earliest.

Proposal 3 – To retain annual surveillance testing for herds in the High Risk Area which meet a given criteria

We will allow retention of annual surveillance testing for lower risk herds in the HRA – i.e. those which meet either of the following criteria:

- The herd has been in existence for at least 10 years and has never had a TB breakdown.
- The herd has been in existence for at least 6 years, has not had a TB breakdown in that six year period and has not had cattle from the High Risk Area added to it in the last five years.

Keepers who are accredited under a CHeCS approved TB scheme should be rewarded for their explicit commitment to managing their TB risks. We will, therefore, also allow herds accredited at CHeCS level 1 and above to undergo annual, rather than six-monthly, surveillance testing. Originally, as set out above, we proposed to limit this to CHeCS level 5 herds and above.

These concessions will be made at the same time as implementing proposal 1.

The government has decided it will not permit biennial testing for any HRA herds.

Proposal 5 – To pay 50% compensation for cattle that cannot be processed for human consumption at a slaughterhouse because they are unclean

We will pay 50% compensation for cattle that cannot be processed for human consumption at a slaughterhouse because they are unclean.

We will, in advance of the measure coming in to force, publish details of how decisions will be made, including the criteria for determining whether cattle are fit to be processed at a slaughterhouse.

Proposal 12 – To offer owners of TB affected cattle herds the option of retaining in-calf TB test positive animals for up to 60 days to allow calving, subject to compliance with biocontainment/isolation conditions

We will allow in-calf TB test positive cattle to be retained for up to 60 days to allow calving, subject to compliance with biocontainment/isolation conditions

In advance of doing so, we will develop and publish clear guidance on the details of the policy, in particular, the biocontainment/isolation conditions that would apply to such cattle. In the meantime, the current process for retaining in-calf TB test positive cattle reactors for up to 28 days will continue.

Annex A: List of organisations that responded to our consultation exercise

Animal Welfare Group

British Blue Cattle Society

British Limousin Cattle Society Ltd

British Veterinary Association/British Cattle Veterinary Association

Burnside Dexter Cattle

Cattle Health Certification Standards

Chartered Trading Standards Institute

Country Land and Business Association

Dartmoor Commoners' Council

Devon Cattle Breeders' Society

Family Farmers 'Association

Forest of Dartmoor Commoners' Association

Herefordshire Cattle Society

Leek Auctions Limited.

Livestock Auctioneers' Association

McCartney's Livestock Auctioneers

National Beef Association

NFU

Salers Cattle Society of UK

Selby Livestock Auction Mart Ltd

Shepton Vets

Shires Veterinary Practice

South Devon Herd Book Society

Tenant Farmers' Association

The Wildlife Trusts

Westpoint Farm Vets

XL Farmcare UK