



**IFA Submission to the
Joint Oireachtas Committee on
Agriculture, Food and the Marine
on the
TB Eradication Programme**

July 2019

The Irish Farmers' Association

The IFA is Ireland's largest farming organisation, with 73,000 farmer members covering all production systems. The Association is structured with 947 branches and 29 County Executives across the country.

The IFA President and various Committee Chairmen, along with branch and county representatives are democratically elected by the farmer membership.

IFA represents all farming sectors at National, European and International level. Through our office in Brussels, the IFA represents Irish farmers on the European umbrella body of farm organisations COPA/COGECA. In addition, the IFA is the representative for Irish farmers on the World Farmers' Organisation.

As the main representative body for Irish farmers, the IFA is requesting the opportunity to meet with and present this submission to the Joint Oireachtas Committee on Agriculture, Food and the Marine.

EXECUTIVE SUMMARY

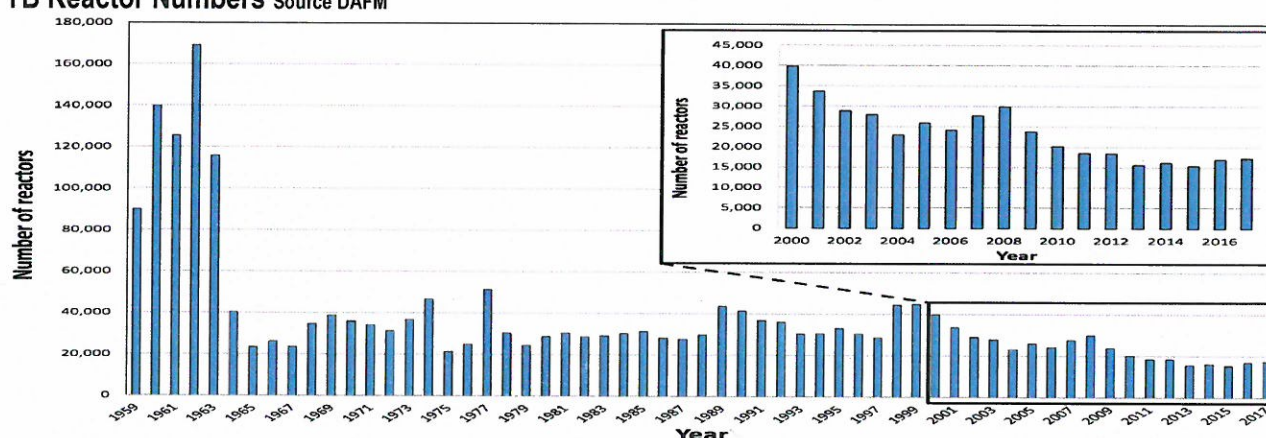
TB Eradication Programme

- Compliance with the current TB Programme obligations costs farmers €55m annually
- The current TB programme's direct costs borne by farmers is €35.154m, the national exchequer €45.536m and the EU €9.748m
- Farmers contributions have increased since 2012 by €4.513m or 15% while the national exchequer and the EU contributions have reduced by €289,000 and €1.337m respectively
- Over the same period the level of compensation paid to farmers has increased by only €1.412m
- These costings do not include the additional €20m labour and associated costs contribution of Irish farmers, as recognised in the UK TB programmes and represents the only farmer contributions to the TB programmes in those jurisdictions
- The burden of TB controls on farmers and their families continue to increase
- Eradication of the disease within the shortest feasible timeframes must be the objective
- Significant progress has been achieved since the introduction of the Wildlife Control Programme in the early 2000's in reducing the levels of TB
- Reactor numbers have reduced from in excess of 44,000 in the late 1990's to 16/17,000 since 2013
- Progress below this level has slowed since
- Additional measures are necessary to advance eradication of the disease
- Improvements to the existing compensation schemes are a key requirement of a new enhanced TB programme to offset the enormous costs and losses imposed on farmers by the Department of Agriculture in the TB programme
- All of the measures in an enhanced TB programme will require additional up-front investment in order for all contributing stakeholders to accrue the longer-term benefits of early eradication of the disease

Key Proposals for the TB Eradication Programme

- Eradication of the disease within the shortest feasible timeframes must be the objective
- Measures implemented must be scientifically based and practical to implement on Irish farms
- Farmers must be fully compensated for all costs and losses imposed on their farms as part of the TB Eradication Programme
- All wildlife that are susceptible to TB must be proactively addressed in the Programme, including in advance of any major infrastructural works taking place that would disturb wildlife in the area
- The disproportionate cost burden imposed on farmers in the current programme must be addressed
- All farmers must be allowed free unhindered access to the market place once the Department of Agriculture determine the holding eligible for derestriction.

TB Reactor Numbers Source DAFM



TB Programme Direct Contributions Source DAFM

TB Programme Direct Contributions 2012 to 2018								
Year	2012	2013	2014	2015	2016	2017	2018	2012 v 2018
Total	€87,553	€83,754	€86,482	€82,696	€84,352	€86,541	€90,438	€2,885
Farmers	€30,641	€31,534	€32,732	€33,171	€33,796	€34,845	€35,154	€4,513
EU Co- Financing	€11,085	€10,221	€12,700	€10,651	€10,445	€9,851	€9,748	-€1,337
DAFM	€45,827	€41,999	€41,050	€38,874	€40,111	€41,845	€45,536	-€291

TB Programme Total Compensation Payments to Farmers Source DAFM

Compensation Payments to Farmer's - Live Valuation, Income Supplement, Depopulation Grant, Hardship Grant								
Year	2012	2013	2014	2015	2016	2017	2018	Diff. 12v18
Comp. Payments	€16,675	€12,670	€15,226	€13,399	€13,992	€14,045	€18,087	€1,412

Introduction

The TB Eradication programme implemented in Ireland remains the single largest animal health cost for Irish farmers each year. In addition, despite less than 4% of herds breaking down with the disease annually, the fear of a TB outbreak continues to be identified by farmers as one of the largest annual stress factors.

While significant progress has been achieved since the implementation of the Wildlife Control Programme in the early 2000's in reducing the prevalence of the disease, unfortunately the ever-increasing burden of additional controls imposed by the Department of Agriculture on farmers has contributed to increased costs and losses for those experiencing breakdowns or contiguous to breakdowns.

The current programme total direct costs provided by the Department are €90.438m. This costing does not include the enormous labour cost associated with the TB programme for farmers, which IFA estimate at a further €20m annually.

Irish farmers contribute a total of €55m each year to the TB programme, €27.746m in annual TB testing costs, €7.408m in disease levies and €20m in labour when facilitating the testing of over 9m animal tests a year and implementing the disinfection protocols following a disease outbreak. In return for the €55m investment, farmers receive only €18.087m in compensation for animal and production loss and maintenance costs.

Over the period 2012 to 2018 the level of farmers direct contribution to the programme has increased by 15% from €30.641m to €35.154m while over the same period the level of contribution from the national exchequer has reduced from €45.825m to €45.536m and the contribution from the EU has reduced from €11.085m to €9.748m.

Farmers in Northern Ireland, Scotland, England and Wales do not pay for annual TB tests or contribute to disease levies. They receive similar compensation to Irish farmers with the exception of €3.5m in consequential loss and hardship grant scheme payments, which are unique to the Irish programme.

Eradication of the disease within the shortest feasible timeframes must be the objective. With this in mind the Minister for Agriculture Michael Creed established the TB Forum involving all stakeholders to develop a strategy to achieve eradication by 2030.

IFA agreed to participate in the Forum on the basis it provided the platform to have the key issues and shortcomings of the current programme addressed for farmers going forward.

These issues were identified to the Minister in advance of the Forum being established and have been raised directly in the Forum meetings by IFA. They are:

1. Addressing the shortcomings in the compensation schemes
2. Reviewing the effectiveness of existing controls

The Department of Agriculture, in written communication to the Forum, stated that they would not support increased compensation for farmers in the TB programme. This clearly shows a lack of understanding from the Minister and his officials of the impact the TB programme continues to have on the livelihoods of farmers and their families, which arises through no fault of their own.

The Forum report to the Minister proposes additional controls and costs on farms with no proposal to reduce the enormous cost burden of the programme for farmers.

IFA Proposals to Eradicate TB and support farmers in the process

Compensation Schemes in the TB Eradication Programme

It is clearly recognised and long established that farmer support for and participation in disease eradication and control programmes are vital to the success of the programme. A critical component in achieving and maintaining this support is the provision of fair and appropriate support measures to the farmers most impacted by the programme requirements.

Providing incentives to influence behaviour is a well-established part of public policy, and has been shown repeatedly to be effective in behavioural economics and social psychology studies.

The current TB programme fails to recognise the importance of fair levels of compensation and the investment and compliance of farmers with the programme, who through no fault of their own, experience a TB episode.

Farmers who have taken all reasonable precautions to protect their animals from TB must be fully compensated for all costs and losses associated with the TB programme. This provides the basis for the Department of Agriculture to implement the necessary on-farm enhancements to the programme to achieve early eradication of the disease.

In this regard, there are changes required to the TB compensation schemes to ensure that the cost burden imposed on farmers is fairly and appropriately addressed and the full investment of farmers to the TB Eradication programme, both directly and indirectly, is recognised in the programme going forward.

Irish farmers contribute €35m annually directly to the TB eradication programme through annual herd test costs and disease levies. In addition, the labour cost associated with herd testing for farmers and the income loss from the removal of animals must also be recognised as a farmer contribution.

This contribution is credited to the farmer in the TB programmes implemented in Northern Ireland, Scotland, England and Wales and is the only farmer contribution to these programmes.

In return for the additional €35m contribution made by Irish farmers towards the programme, which is not provided by farmers in the countries listed above, Irish farmers receive approximately €3.5m in supplementary schemes.

This leaves a surplus of €31.5m in farmer contributions which must be used to address the issues outlined below.

Support schemes for farmers experiencing TB Breakdowns

There are currently four compensation/support schemes available under the TB eradication programme.

1. The **Live Valuation scheme**, which is intended to provide the market value the TB Reactor animals would be reasonably expected to attain if offered for sale on the open market.
2. The **Income Supplement Scheme**, which is available to farmers who lose over 10% of their herd in a TB breakdown, or 10% of the milking herd on dairy farms.
3. The **Depopulation Grant Scheme**, which is payable where a herd is removed entirely or partially due to a TB Breakdown.
4. The **Hardship Grant Scheme**, which is payable over the winter months to eligible farmers for the maintenance of additional animals due to TB restrictions.

All four schemes are fundamental components of the TB eradication programme in seeking to compensate farmers for the enormous burden of TB outbreaks on farms. However, all four schemes have significant shortcomings that must be addressed in the TB programme.

Independent Live Valuation Scheme

In order to provide all farmers losing animals as TB reactors with the opportunity to have their animals assessed and valued independently, there are a number of changes to the current scheme that are required.

IFA agreed an independent Live Valuation Scheme with the Department in the early 2000s to provide all farmers with the opportunity of having their animals assessed independently to determine the price they would be reasonably expected to attain if offered for sale on the open market.

Through the inclusion subsequently of administrative controls by DAFM, such as penalty points for valuers and bureaucratic non market reflective “Guidelines for Categorisation of Animals” and the compilation of guideline prices (Summary of Market Prices) by DAFM personnel from in appropriate data sets this independence has now been removed.

In order to re-establish the independence of the scheme, IFA is calling for the Independent Valuers to be allowed independently value the animals in the scheme, without the administrative constraints imposed by the Department of Agriculture.

The summary of market prices must be compiled from an agreed appropriate data set, independent of the Department of Agriculture.

Income Supplement Scheme and Depopulation Grant

These schemes must be amended to better reflect the actual income loss experienced on farms in TB breakdowns, where animals are removed and cannot be replaced until the restriction is lifted by the Department of Agriculture. These losses are particularly acute on dairy farms where cows are in full production and on suckler farms where cows rearing calves are removed.

IFA has carried out a detailed analysis (see table below) of the impact on income of these events based on the Teagasc National Farm Survey information over a three-year period 2015 to 2017. The respective losses over a 12-month period are €1,320 for dairy cows, €672 for suckler cows and €432 for other animals.

The current payments in these schemes are not reflective of the actual losses incurred by farmers, do not pay for all animals removed and only pay from the date the animals leave the farm.

IFA Proposal

Income Supplement and Depopulation grant scheme rates must reflect the full extent of income loss when animals are identified as TB reactors on the farm.

These rates must be applied from the date animals are identified as TB reactors on the farm, paid on all animals removed from the farm and paid for the entire period of restriction under both schemes.

Set out below based on a detailed analysis of the Teagasc NFS information 2015 – 17, is the actual income loss on a monthly basis (average/month/12 months) associated with each category of animal when identified as a TB reactor and the current rates payable.

Category	Loss per animal p.m. (€)	Current Income Supplement Rates p.m. (€)	Current Depopulation Grant Rates p.m. (€)
Dairy Cows/Springing heifers	110	55*	55*
Suckler Cows/Springing heifers	56	38.09*	38.09*
Other cattle	36	25.39	19.04

* Cows only

Hardship Grant

The current scheme provides for a payment of €38 per month for each suckler cow and €25 per month for each dairy cow or other bovine animal retained on the farm subject to a maximum payment of €250 per month. Payments are for a maximum of 4 months and only available within the period 1st November to 30th April. Farmers with an off-farm income are not eligible for these payments.

IFA Proposal

The restriction of holdings in the TB programme adds enormous additional cost and management difficulties on farms, increasing the feed and housing requirements.

Farmers are often faced with fundamental changes to their normal farm practice which requires significant and unbudgeted investments.

The Hardship Grant Scheme must be amended to reflect the full extent of costs incurred by farmers due to the forced maintenance of additional animals.

The scheme must be available to all farmers who have to maintain additional animals as a result of a TB restriction, available throughout the year and paid at the established Teagasc maintenance costs for each category of animal including additional housing requirements.

Calves in dairy herds

The restriction of dairy farms at calving time adds a huge additional issue for farmers, where calves normally sold under 6 weeks of age have to be maintained. This increases housing demands, labour demands and feed costs on these farms.

IFA Proposal

Farmers must be supported in dealing with the restriction to sale of new born calves on dairy farms through the provision of financial assistance to rear the calves or grant aided removal of the calves from the farm under the Hardship Grant Scheme.

The TB Forum under the Chairmanship of Michael Cronin have failed farmers by failing to recognise the impact of the TB programme on farmers and their families when refusing to propose vital improvements to the compensation schemes as outlined above by IFA.

This refusal is hindering progress on important enhancements to the eradication programme.

IFA Proposals for Additional Policy Measures to Eradicate TB

Wildlife

The effective management and control of wildlife susceptible to TB is vital in eradicating the disease from the country. This must continue to be the key policy in the enhanced TB programme.

The existing Wildlife Control Programme must be appropriately resourced to ensure timely and effective captures take place surrounding all TB outbreaks where wildlife is associated with the breakdown.

The programme must be extended to proactively reduce densities of wildlife, including deer, in advance of major infrastructural works and deforestation commencing to protect cattle from TB outbreaks that have been all too common as a result of wildlife disturbance throughout the country.

Badger density reduction must continue to be the primary focus of the Wildlife Unit with no further expansion to vaccination areas until concerns raised as to its effectiveness have been appropriately addressed.

A National Deer Management strategy must be developed and resourced to reduce deer density throughout the country to the levels that are sustainable within their natural habitat and at which they are not a disease threat to farm animals.

The Department must provide the supports and oversight to implement a deer population reduction programme surrounding TB outbreaks.

Breakdown Management

All controls imposed on farmers in the programme must have a sound scientific basis, contribute directly to eradication of the disease and be fully compensated for where they impact on the normal functioning of the farm.

TB breakdowns do not recognise county or regional office boundaries or Veterinary Inspector DED's. The Department's management of TB breakdowns should be based on a breakdown area under single management to ensure consistency of approach and immediate access to all relevant information associated with the outbreak.

A detailed and thorough investigation of all TB breakdowns involving more than 1 animal must be carried out to identify and remove all sources of the disease in the herd.

The Department must target resources and controls in the cases deemed highest risk to remove the disease from the farm, these farms must then be allowed unhindered access to the open competitive market for their animals. These farmers must be fully compensated for all costs and losses incurred during the restriction.

Included in addressing the TB problem on these farms must be earlier consideration if agreeable with the herdowner of depopulation in order to return the farm to normal functioning in the shortest feasible timeframe.

Farmers must be supported in removing high risk animals from their farms if the Department data identifies these animals as higher risk of infection or likely to contribute to further TB breakdowns.

A complete review of all existing controls must be carried out to assess their relevance/contribution to eradication of the disease and where not contributing in a meaningful way or where the cost burden is not compensated for must be removed from the programme.

The Department should provide direct contact details of individuals responsible for breakdown herds to the herdowner. This person must have detailed knowledge of all components of the TB programme and access to all relevant information for the herd.

All herds once derestricted by the Department of Agriculture, following intensive investigation, testing and disinfection must be allowed free unhindered access to the market place.

Testing

The most suitable tests and testing approach for Irish conditions and disease levels based on solid scientific data must be used including determining the feasibility and value of environmental screening for TB.

The Department must ensure they have the oversight and effective monitoring systems in place to ensure all TB testing is carried out accurately and correctly.

Bio-security

The Department of Agriculture should issue detailed bio-security advice to assist farmers in reducing the contact between cattle and potentially TB infected wildlife. Where infrastructural on-farm changes are necessary, the Department should provide financial supports to farmers to implement these changes.

The Department must highlight the importance of good disinfection to reduce the risk of TB reinfection from environmental contamination.

IFA Reaction to the Department of Agriculture Herd Categorisation Proposals

The Department has identified that a number of factors contribute to TB breakdowns.

In response to these risks, and in particular the findings that herds which experience breakdowns remain at higher risk for pro-longed periods, the Department has proposed **Herd Categorisation** as a tool to address the risk and expedite eradication.

IFA has strongly rejected all three proposals by the Department of Herd Categorisation to address this risk.

IFA do not dispute the Department findings in relation to this risk factor, the objection is to the proposed approach in addressing this risk.

The DAFM Herd Categorisation will only serve to increase the enormous financial burden of the controls on farmers, benefit opportunistic buyers in the market place having devalued animals from these herds and fails to address the substantive issue of the on-going disease risk left on the farms or in the environment.

IFA support additional measures in higher risk TB breakdown herds that are scientifically based, practical and feasible to implement and that expedite eradication of the disease. These herds must be fully compensated for the losses and costs imposed by current and any additional measures in the TB programme.

The Department has identified that herds with previous TB history are at a higher risk of future breakdowns with TB. This is clearly as a result of the Department controls and investigations at the time

of the breakdown failing to identify and remove all sources of TB from the farm during the episode. The Department proposal to address this by categorising these herds and only allowing trade with herds of a similar or lower status is not acceptable to farmers and is not feasible to implement for a number of reasons.

These include:

1. Severe disruption to the market for live animals including potentially very serious implications for the vital live export trade for dairy farmers and suckler farmers. It is simplistic to assume that the animals for sale from herds that would be categorised as higher risk would be evenly matched with herds of similar or lower status purchasing animals to allow a normal competitive market to function. This is in addition to the potential implications for our vital export trade. If nationally herds are prevented from trading with a herd of a higher status it is not reasonable to assume that export outlets would continue to be available for these herds. This would have devastating consequences for dairy and suckler farmers.
2. The Department figures do not identify animal movements from high risk herds as the primary driver of the on-going TB issue in this country. The Department's own study attributes only 7.4% of breakdowns to animal movements. Therefore, considering such a draconian response with the potential of enormous unintended consequences is disproportionate
3. The proposal fails to take into account the realities of the farming structure in this country and more importantly the importance and necessity of trade and the live export trade which is not replicated in the jurisdictions referenced by the Department in making this proposal
4. The cost burden imposed on farmers as a result would effectively put the lower income sectors of suckling and beef farming out of business, if trade was to be distorted for the periods of time referenced with the additional risk of creating serious welfare issues on these farms.
5. The secondary proposal to provide herd category data to farmers directly and allow the market place react does not contribute to eradication of the disease. It merely devalues the animals for farmers who have suffered the cost burden of a TB episode, further compounding the costs currently associated with the controls of the programme. Dealers and opportunistic buyers would welcome the opportunity to acquire cheap cattle for onward movement from these herds with no contribution to the TB programme accruing as a result.

All farmers purchasing cattle in this country must have confidence that the cattle allowed for sale by the Department of Agriculture, having met the requirements of the EU trade directives, are at the accepted low risk of being infected with TB.

It is the responsibility of the Department of Agriculture to ensure all measures necessary to remove the disease from the farm have been implemented before the farm is allowed trade. Throughout this process the affected farmers must be fully compensated for the impact of the controls on their farm.

Costs and Benefits

The Department of Agriculture in detailing the costs of the TB eradication programme fail to recognise the full extent of the costs incurred by farmers.

In order to advance the discussions on costs and benefits of the TB eradication programme in a fair and accurate manner, the Department of Agriculture must first recognise the full contribution of farmers to the programme.

The key and substantial farmer contribution to the programme not recognised by the Department of Agriculture is the labour costs incurred by farmers in assembling cattle for TB testing, the associated production loss and disinfection requirements prior to derestriction.

It is notable that the only contribution made by farmers in Northern Ireland, Scotland, England and Wales to their TB programmes are the contributions outlined above, which is clearly accepted and recognised by the relevant authorities in those countries.

It must also be recognised that Irish farmers are unique in comparison to farmers in those countries in contributing directly an additional €35m annually in TB testing costs disease levies to the programme.

The labour input and other associated costs incurred by farmers in Ireland's TB programme must be fully recognised.

TB testing on most farms extends to more than the assumed 2 days due to larger herd sizes and the dispersal of animals on fragmented holdings in smaller farms. The annual TB test imposes additional labour requirements and in cases time taken off work to facilitate the testing. Additional labour and costs are also experienced by herds where breakdowns occur in carrying out the obligatory disinfection.

Annually, the Department require farmers to facilitate almost 9m animal tests. This can involve farmers assembling animals on up to 10 occasions in a year. All of this requires a significant labour and time input.

The cost of labour alone, conservatively calculated at the minimum wage, provided by farmers to the TB programme for the testing and disinfection components of the programme is €20m.

It is also accepted convening animals for TB testing impacts on the productivity of the animals and increases the levels of animal health issues experienced on the farm. In addition, farmers are required to provide and maintain handling facilities for their entire herd to be tested in a safe manner. All of these costs must be recognised as farmer contributions to the current programme.

The costs outlined show an additional €20m contribution to the TB eradication programme by farmers which has not been recognised in the published Department costings.

Therefore, the real cost of the TB programme is €110.438m annually with farmers contributing €55.154m or 50%, the Department of Agriculture contributing €45.536m or 41% and the EU €9.748m or 9%.

Farmers direct contributions have increased since 2012 by €4.513m or 15% while the national exchequer and the EU contributions have reduced by €289m and €1.337m respectively.

This current level of funding leaves farmers with an unfair and disproportionate cost in the TB programme when the benefits of the programme are assessed.

The suggestion the benefits of export market access and improved productivity are solely farm based is incorrect.

To estimate the value of a programme, which supports a sector, it is necessary to look at the impact expenditure has in that sector in its entirety. The effect commonly used is the Output Multiplier.

This measures how much direct and indirect output required per €1 of final demand of a product or service, this looks at the level of output required from other sectors to create €1 of output in a sector according to the CSO.

When the Output multiplier is disaggregated for specific sectors and categories within sectors variation is evident.

For each €1 of output produced on cattle farms, due to the multiplier effect, an additional €1.49 of output is generated in the Irish economy. This is the value of other direct and indirect input required in the wider economy.

When you look at the wider impact of the cattle sector at national level, a multiplier of 2.49 is estimated (Miller et al. 2011). This means the current value of €2.4bn of output from the beef sector, based on estimates of exports, would lead to the equivalent of almost €6bn of output to the wider Irish economy. This would correspondingly add €3.3bn to the value of Irish GDP.

Exports from the biosector, which includes agriculture, generates 2.5 times more in net foreign earnings than the non-biosector. This is based on lower import requirements per euro of export and lower repatriation of profits due to the sector sourcing inputs primarily from Irish based companies (Riordan, 2008).

Notwithstanding this, the dangers of land abandonment in marginal areas, causing loss of natural landscapes and biodiversity, such losses would impact rural areas disproportionately more than urban centres due to concentration in some areas, in particular the BMW region where only 18-27% of the farms are economically viable.

In addition, the benefits of eradicating TB from the national herd from a human health perspective must be included when identifying the beneficiaries of TB eradication and by extension the appropriate funding levels of all stakeholders.

Additional farmer costs in the TB programme

Category	No. Herds	No. Days	Total Days	Cost @€80/day/ €
All Herds - Annual Test	114,000	2	228,000	18,240,000
Restricted Herds additional tests	4,000	4	16,000	1,280,000
Restricted Herds disinfection	4,000	1	4,000	320,000
Total				19,840,000

EU 30-day TB pre/post movement test proposal

Proposals contained in the Commission Delegated Regulation Supplementing Regulation (EU) 2016/429 of the European Parliament and the Council laying down rules for surveillance, eradication programmes and disease freedom for certain listed and emerging diseases has the potential to dramatically increase the costs of the TB eradication programme in Ireland.

This draft Commission Delegated Supplementing Regulation lay down rules for surveillance, eradication programmes and disease freedom from certain listed and emerging diseases that will impact directly and primarily on farmers and their livelihoods.

In the draft Delegated Regulation, the EU is proposing a 30-day pre/post-movement test for TB for all animals from herds that are over six months tested, in order for herds to maintain TB free status. This targets the lowest TB risk herds in the country for additional controls.

There is no justifiable scientific basis for this measure in TB eradication.

In addition to the absence of a justified scientific basis for this measure to eradicate TB the measure severely distorts the normal marketing of animals within Ireland and removes vital competition from the market place when associated additional costs and management practices are applied.

The Irish cattle herd consists of a large number of small-scale farm family establishments with an average herd size of 66 animals based the latest published CSO data. These establishments are heavily dependent on the vital competition provided by the live trade for their animals.

The costs associated with a pre/post-movement test requirement renders the live trade for the vast majority of these farmers unviable removing vital competition from the market. Most of these farmers sell less than 5 animals, a pre-movement test imposes an additional cost of approximately €100 to the sale. For these low-income farmers this is economically unviable.

This requirement will impact severely on marts and throughput in mart sales as the additional costs and inconvenience will drive more farmers directly to factories, removing vital competition to the benefit of factories.

The application of this measure will also directly impact on the functioning of the live export of weanlings and store cattle as a result of the time delay required between TB skin tests adding significant additional cost to this vital trade.

This proposal is not scientifically based and will be a major impediment to the competitive marketing of animals. It could cost the Irish TB programme up to €20m a year, putting Irish farmers at a competitive disadvantage in comparison to farmers throughout the EU.

Irish farmers already incur a disproportionate cost burden in the TB programme in comparison to all other farmers throughout the EU and will not accept this additional cost and anti-competitive measure imposed on them that will not contribute to eradication of the disease.

The 30-day TB pre/post movement test criteria for within member state movement of animals must be removed and member states provided with the flexibility to apply appropriate measures, based on epidemiological risk assessments of the situation within their country, to determine how herds maintain their disease-free status.

The Delegated Regulation must be consistent with EU policy of simplification and member state autonomy. It has to provide the flexibility for individual member states to apply appropriate and practical measures based on the unique circumstance that pertain and the huge variation in production systems in each country.

The only beneficiaries of this proposal will be vets and factories at the expense of farmers, marts and our vital live export trade.

This proposal must be rejected outright in the interest of Irish farmers and scientifically credible TB control measures.

Conclusion

Farmers have and continue to support the efforts of the Department of Agriculture in eradicating TB from the national herd at an enormous direct and indirect cost.

IFA is demanding the eradication of TB from the national herd in the shortest feasible timeframes.

However, this cannot be achieved by further increasing the already enormous and disproportionate cost burden imposed on farmers in the programme.

The main contributing factors identified by the Department of Agriculture to the current stagnation of progress towards eradication can be addressed in a more practical and effective way that takes account of the farming dynamic in Ireland and the importance of animal movements.

This will require up-front investment in the short term in order for all stakeholders and beneficiaries to accrue the long-term benefits of early eradication of the disease from the national herd.

IFA has set out in detail our proposals in this submission as to how this can be achieved. These proposals have also been sent in detail to the Minister for Agriculture and the TB Forum.

The Minister for Agriculture, his officials and our MEP's must reject the EU proposal to impose a 30-day pre-movement test for animals leaving farms that are over 6 months tested.

End