BACKGROUND INFORMATION:

A study of bovine tuberculosis (bTB) infected United States (US) dairy herds that have undergone test and remove (T&R) protocols since 1985 provides evidence that T&R is a cost effective and efficacious method to eliminate bTB while minimizing risk to other herds, wildlife and humans. In low prevalence herds, current testing protocols and quarantine provide a significant margin of safety. Meanwhile, the cost to depopulate all bTB infected herds has, in some cases, increased beyond what governments can afford. The loss of herds through depopulation also has great impact on community economic conditions.

While T&R is scientifically, socially and economically a good option for low bTB prevalence herds, current United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) policy (VS memorandum 552.38, March, 2008) on the equal count of affected herd years throughout the quarantine period make T&R unattractive as an option because of the potential downgrade of a state’s bTB status. In Modified Accredited Advanced (MAA) states/zones with less than 30,000 herds and in Modified Accredited (MA) states/zones with less than 10,000 herds, an affected herd going through T&R will count fully throughout the approximately 4.5 year quarantine even as confidence in the herd’s elimination of bTB increases with each subsequent negative whole herd test over time. The requirement for an additional two to five years (dependent on the current status of the state/zone) of being bTB free after the end of the quarantine period is overly burdensome to a state to advance to the next higher status, when there have been no identified infected cattle for four years. Since 42 states currently have less than 30,000 cattle herds, the USDA-APHIS-VS policy memorandum has potentially widespread impact.

There is now enough evidence of the effectiveness of T&R in low prevalence herds to change the counting of affected herds that meet specific criteria of prevalence rate, approved herd plan development, epidemiological investigation and regular review. Meeting the criteria would define a herd as an approved T&R herd and, therefore, qualify it for the benefit of a change in affected herd year counting. The counting can be changed by a multiplication factor that decreases with increasing years and negative testing results in a T&R program.
RESOLUTION:

The United States Animal Health Association (USAHA) urges the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) to adopt changes to VS Memorandum 552.38 in the counting of affected herd years for approved Test and Remove herds by reducing the value to 75 percent of an affected herd in year two, 50 percent in year three, and 25 percent thereafter when no additional infected animals are found.

RESPONSE:

USDA, APHIS, Veterinary Services

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) would like to thank the United States Animal Health Association’s Committee on Tuberculosis (TB) for its interest in the National Tuberculosis Eradication Program. VS intends to make changes to regulations and policies governing the administration of the bovine TB program to ensure that the program is responsive, timely, and cost effective. Moreover, these changes will take into account the changes in the cattle industry that have occurred since the last major revision of the regulations. One of our first priorities will be to consider alternatives to State status that are based on science and address the risks associated with each situation appropriately.

As we take these next steps, VS will maintain a close working relationship with our stakeholders so that together we can develop a strategy for the TB program that will build upon the successes of the past. VS held five public listening sessions in December 2008 to solicit input from our stakeholders regarding revisions and improvements to the program, and we will continue this transparency as we proceed. VS will consider this resolution from the TB Committee when developing these short- and long-range plans for the program.