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Mr N H Beswick Reacliffe Farm Rudyard, Leek Staffordshire ST13 8RS

7 December 2016

Dear Mr Beswick,

APPROVED FINISHING UNIT PROPOSAL

Thank you for inviting me to visit your farm on Monday 5 December 2016 to give you some advice on how you could best utilise your buildings for rearing cattle.

We discussed the possibility of using some of your buildings as an Approved Finishing Unit (AFU) that can take cattle from TB restricted herds for fattening and slaughter. The most important points to bear in mind about such units are:

- They should be proofed against access by badgers. Effectively this means that there must be solid sides to a height of 1.5 metres and there must not be any gaps under doors or gates that exceed 7.5 cm (3 inches)
- 2. There must be no opportunity for direct or indirect contact with cattle that are not within the AFU

The large renovated building you showed me at the rear of your property is divided into a number of bays and you asked if the first two of these were suitable for licensing as an AFU. We decided that the door at the back of the second bay would have to be blocked and the bottoms of the windows raised to the required height (1.5 metres). You would also need to provide a gate at the entrance to the unit. We thought this would best be achieved by having one that opens inwards and shuts against the threshold. Nevertheless, an alternative arrangement that fulfilled the requirement of being solid-sided to 1.5m and with a gap underneath of less than 3 inches would also be acceptable.

It has since occurred to me that it would be advisable to construct a small yard in front of this gate so as to make it safer and easier for you to open the gate into the unit without fear of animals escaping.

Whilst the building is, in my opinion, suitable to be modified for keeping cattle I would also advise that you give some thought to ventilation. As a solid sided unit with few openings you would need to ensure that there was a reasonable airflow. As you will be

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aware, poor ventilation is a prime factor in the development of pneumonia in cattle and in calves particularly.

I have enclosed with this letter a copy of the "Terms and Conditions of the Approval and Operation of an Approved Finishing Unit without Grazing" that gives more details of the structural and operational requirement of such units. There is also an application form enclosed for your convenience.

If you have any further queries please do no hesitate to contact.

Yours sincerely,

N D Wilcock

Veterinary Officer

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Guidance Notes on the Conditions of Approval and Operation of a TB Isolation Unit in England

Approved TB Isolation Unit: to allow the isolation of TB Restricted Cattle from a single source with the aim of achieving TB free status

Background and Purpose

TB Isolation Units are Approved for Cattle Only

TB Isolation Units (IUs) have been introduced to enable the isolation and testing of a group of cattle in order to achieve freedom from TB restrictions. The intention is to create a distinct group of cattle with a similar infection risk (same herd, same age group, same previous exposure to infection risk) and status (hence the limited entry window), so that a breakdown testing regime is likely to find infection if present.

Cattle can be moved to the TB IU, where they will undergo a testing regime and, if appropriate, may regain Officially Tuberculosis Free (OTF) status.

They provide an outlet for calves or store cattle from TB restricted holdings lacking the facilities for rearing and they provide an opportunity to isolate and test cattle in order to regain the TB free status of those cattle. Single animals must not be kept in isolation.

IUs are not intended for pregnant animals and no breeding should take place in these units. However where all the facilities that may be required in the event of prolonged restrictions are provided within the confines of the unit these scenarios may be considered subject to a satisfactory veterinary risk assessment and a contingency plan e.g. there must be provision of:

- · calving areas
- · milking facilities for dairy females, and
- · calf accommodation where applicable.

Animals that are due to calve within the minimum period for which they will be required to remain in the unit will not be licensed into the unit.

IUs can only be approved on an OTF premises. They cannot be approved or a new CPH issued on a premises that is under movement restrictions (TB02).

The following will apply to the unit:

- must be under movement restrictions (TB02)
- must have a separate and unique County Parish Holding (CPH) which will only be allocated after approval
 of the unit
- must not have any Sole Occupancy Authority (SOA) or British Cattle Movement Service (BCMS) link with any other premises
- · must only be filled with cattle from a named single source
- must only be allowed a period of six weeks to fill the unit.

Source of Cattle

- TB IUs may source cattle from a single TB restricted premises, but not from multiple premises
- all cattle must have tested clear within the previous 30 days or be untested calves under six weeks of age at the time of the movement
- cattle can only be moved onto the TB IU under the authority of a movement licence (TB16) which will be issued by the Animal and Plant Health Agency (APHA) office responsible for the premises of destination:
 - all movement requests will be subject to a Veterinary Risk Assessment (VRA) by APHA and those considered to be high risk will be refused

the TB IU will be closed after a six week filling period after which no further licences will be issued for
movements on to the premises. Once closed, the operator must forward the completed Appendix to the
TB16 licence with details of the first and last movements into the unit and a list of all the animals within the
unit, to the local APHA office.

Destination of Cattle

Until OTF status has been gained, cattle cannot leave the TB IU, except under licence and subject to a
satisfactory risk assessment. The destination will be limited to an Approved Finishing Unit (AFU) or to
slaughter. Once OTF status is gained and a Withdrawal Notice (TB10) lifting restrictions is served, cattle will
no longer be under movement restriction and may move without the need for a licence.

TB Testing on TB Isolation Units

- once the TB IU has been closed, and the operator has forwarded the completed Appendix to licence TB16
 to the local APHA office, testing within the unit will be at 60 day intervals. The first Approved Separate
 Group (ASG) test at 'severe' interpretation will be carried out at least 60 days after the last animal has
 entered the unit
- all cattle within the unit will be tested
- after two clear consecutive tests have been completed, and providing the last test commences at least 120
 days after the date that the unit was closed, a Withdrawal Notice (TB10) may be issued to lift restrictions.

Conditions

TB Isolation Units without Grazing

The conditions listed below are aimed at ensuring that the TB IU remains a discrete, self-contained cattle unit clearly isolated from other cattle herds.

The approval of TB Isolation Units can be considered if the proposed premises comply with the following conditions:

- IUs can only be approved on a premises that is OTF at the time of approval
- · each unit should meet all the criteria required to qualify for a separate CPH
- the boundaries of the unit should be:
 - o well defined
 - o discrete
 - o effective, and
 - o secure
- there should be separate:
 - o housing
 - o management
 - o equipment (see below),
 - o machinery (see below),
 - yards etc and a double fence with a 3m gap or something that effectively serves the same purpose
 e.g. a solid wall to a building with no openings or opportunity for leakage of drainings from the unit would be an acceptable part of a boundary
- there must be no opportunity for straying or for nose-to-nose contact with other livestock
- cattle may only move into the unit under licence issued by APHA. No other cattle must have access to the unit at any time
- units must not be co-located on a yard where another herd exists, including any type of TB unit
- multiple units cannot co-exist within the same yarded area but multiple buildings within a yarded area may be acceptable as one single unit
- units must have strict biosecurity with protocols in place for movements of personnel, equipment and vehicles entering and leaving the unit. All such movements must be limited to those essential to the running of the unit
- if personnel, equipment or vehicles are to be used/have access to other cattle outside of the unit, the biosecurity protocol should refer to this
- protocols must also be in place for drainage of effluent and washings from the unit. There must be no drainage of effluent or wash offs from the unit into areas where TB susceptible stock have access

- · protocols must include access to feed
- buildings must have sufficient space to allow for the growth of the cattle to be allowed in the unit and a
 maximum capacity stated in the conditions for approval. It is the responsibility of the owner/operator of the
 unit to ensure that the welfare of the cattle is not compromised by overcrowding. The number of cattle which
 the unit can hold must be included on the approval and the owner/operator must have consider
 contingencies to exclude potential adverse welfare conditions which will be recorded and agreed
- units must be wildlife proof
- either the buildings containing the cattle must be fully wildlife proof or the boundary to the unit must be fully wildlife proof. This can be achieved for example by the use of electric fencing as a boundary around the building(s). The boundaries of the unit must also be livestock proof
- wildlife-proof in this context refers to species of wild mammals that can act as reservoirs of M. bovis (e.g. badgers and, potentially, wild deer) and suitable conditions include:
 - sides of the building should not be open, but of a smooth and solid construction (i.e. not to allow wildlife to get a purchase) and greater than 1.5m high
 - o doors should be of smooth and solid construction (i.e. not to allow wildlife to get a purchase) and a minimum of 1.5m high (solid sheets of metal can be added to a five bar gate)
 - gaps at the sides and under doors and walls should be no greater than 7.5cm and must not be able to be enlarged by digging or chewing
 - where effluent or waste water drains into a soak away ditch, wildlife must not have access and wire or suitable electric fencing or other suitable fencing should be used to prevent such access.
 This is to prevent the contamination of the environment and wildlife
 - where electric fencing is to be used at the boundary of the TB IU to ensure access to wildlife is denied, it is important to note that official recommendations are that strands of wire should be at 10, 15, 20 and 30cm above the ground
- · equipment should be dedicated, unless:
 - o contamination is at a level that can be satisfactorily cleaned using a power wash and/or disinfectant
 - any contamination should be dealt with immediately and certainly before contact with other TB susceptible stock
 - contamination will be assessed according to risk and generally shared feed wagons will be acceptable, whilst dung scrapers will not
 - o either dedicated outerwear or waterproof clothing must be worn and a protocol provided to demonstrate elimination of risk of disease spread
 - o a full and effective biosecurity protocol will be required for all shared equipment
- manure will be treated as normal once OTF status is gained, but before this time stacked for three weeks on the site of the unit, or at an approved site to which wildlife or other livestock do not have access
- slurry will be treated as normal once OTF status is regained, but if it is necessary to empty slurry tanks before that time, it should be either:
 - stored for at least six months and must be spread a minimum of 10m from the farm boundary or from any land grazed by, or housing used by, any TB susceptible stock (includes sheep, pigs, goats, camelids and farmed or park deer) and there will be no access to the treated ground by TB susceptible stock for 60 days following spread, or
 - o spread by injection into the ground if six month storage is not possible.

TB Isolation Units with Grazing

Grazing may be allowed in units in the HRA in England only, but only if APHA consider there is a low risk of local spread of infection. A VRA will be carried out including assessment of the TB situation in the local area.

The conditions listed below are aimed at ensuring that the TB IU remains a discrete, self-contained cattle unit clearly isolated from other cattle herds:

- each unit should meet all the criteria required to qualify for a separate CPH
- · the boundaries of the unit should be:
 - o well defined
 - o discrete
 - o effective, and
 - o secure
- · there should be separate:
 - o grazing
 - o housing/shelter
 - o management

- o equipment (refer below)
- o machinery (refer below)
- o yards etc and a double fence with a 3m gap (or something that effectively serves the same purpose. e.g. a solid wall to a building with no openings or opportunity for leakage of drainings from the unit would be an acceptable part of a boundary. All gates on the boundary must also be double fenced
- grazing included in the IU must be within the same parcel of land as the buildings or on a contiguous land
 parcel The entire unit including the grazing must be defined by a single outer boundary. Cattle must not
 have access to any premises outwith the boundary of the IU in order to access the grazing
- housing must be available for all cattle within the unit for poor weather conditions, treatment and handling.
 Plans for situations causing adverse welfare must be considered. The housing does not have to meet the strict wildlife biosecurity measures as for units without housing, as some will be 'open' to allow cattle constant access from pasture
- however every effort should be made to reduce the chance of cattle/badger interaction. There should be no
 ground feeding of energy or mineral supplements. Raised/badger proof troughs should be provided for feed
 and water and feed stores should be fully badger proof as for units with no grazing above
- there must be no opportunity for straying or for nose-to-nose contact with other livestock
- cattle may only move into the unit under licence issued by APHA. No other cattle must have access to the
 unit at any time
- · units must not be co-located on a yard where another herd exists, including any type of TB unit
- multiple units cannot co-exist within the same yarded area but multiple buildings within a yarded area may be acceptable as one single unit
- units must have strict biosecurity with protocols in place for movements of personnel, equipment and vehicles entering and leaving the unit. All such movements must be limited to those essential to the running of the unit
- if personnel, equipment or vehicles are to be used/have access to other cattle outside of the unit, the biosecurity protocol should refer to this
- protocols must also be in place for drainage of effluent and washings from the unit. There must be no drainage of effluent or wash offs from the unit into areas where TB susceptible stock have access
- · protocols must include access to feed
- access to watercourses will be acceptable, providing there can be no contact with neighbouring stock. If the
 watercourse is shared double stock proof fencing must be used
- equipment should be dedicated, unless:
 - o contamination is at a level that can satisfactorily be cleaned using a power wash and/or disinfection
 - o any contamination should be dealt with immediately and certainly before contact with other TB susceptible stock
 - contamination will be assessed according to risk and generally shared feed wagons will be acceptable,
 whilst dung scrapers will not
 - either dedicated outerwear or waterproof clothing must be worn and a protocol provided to demonstrate elimination of risk of disease spread
 - o a full and effective bio-security protocol will be required for all shared equipment
- manure will be treated as normal once OTF status is gained, but before this time must be stacked for three
 weeks on the site of the unit, or at an approved site to which wildlife or other livestock do not have access
- slurry will not be stored, and may be spread as normal once OTF status is gained, but if spread before lifting
 of restrictions must be spread a minimum of 10m from the farm boundary or from any land grazed by, or
 housing used by, any TB susceptible stock (includes sheep, pigs, goats and camelids, farmed or park deer)
 and there will be no access to the treated ground by TB susceptible stock for 60 days following spread.

Application and Inspection

- persons seeking approval for a TB IU should either contact their local APHA office who will provide them with an application form or obtain the form from GOV.UK
- on receipt of a completed application form and other required documents, a Veterinary Officer (VO)/Veterinary Inspector (VI) will consider the application and if they consider that approval may be possible, will visit and inspect the proposed premises
- following a satisfactory inspection report and indication that the application is suitable for approval, a request for a new CPH must be submitted by APHA to the Rural Payments Agency (RPA) Customer Service Centre. Once the new CPH number has been allocated, RPA will forward it to the local APHA office. Written confirmation of the approval will then be sent to the operator, along with the conditions and requirements for continued approval
- the TB IU will be served with a TB Restriction Notice (TB02) prohibiting movement of bovine animals which will be copied to the relevant Local Authority (LA)

- the TB IU will be issued a Withdrawal Notice (TB10) removing restrictions once the OTF status of the cattle
 within the unit has been regained. Once depopulation is complete the owner may apply for re-approval if
 they wish to continue to operate as a TB IU
- the re-approval process may involve an inspection visit to the premises and/or a check of the movement records of movements. Whilst in use, every unit will be inspected at least once annually, but the frequency of inspections will be determined by the local APHA office
- once re-approved, a movement restriction will be served (TB02) and a movement licence issued (TB16) so that the TB IU may restock
- failure to comply with any of the conditions set out in the approval form (including failure to test the cattle on
 the unit at the prescribed interval) will result in APHA investigation and a VRA. Movement restrictions
 (TB02) will continue to operate until OTF status can be achieved. Subject to the outcome of the VRA, this
 may be achieved by testing or slaughter of the animals in the unit, followed by (cleansing and disinfection)
 C&D of the premises in the latter scenario but further requests for re-approvals are unlikely to be authorised
 following non compliance.

Action in the Event of a TB incident in the Isolation Unit

- the standard APHA procedures for compensation, removal and post-mortem of reactors will be applied
- · the normal procedures for regaining OTF status will apply and a Short Interval (SI) testing regime followed
- a contingency plan will be necessary for all units for the event of a TB incident, as the SI testing programme
 will be extended. The plan should address any potential welfare issues that may arise, e.g. there must be a
 plan for the event that the stock outgrow the accommodation available to them.

Management of the CPH once OTF Status is Gained

- once the Withdrawl Notice (TB10) is issued and OTF status gained, a six month test will be scheduled for the unit
- if the unit is depopulated and cattle are no longer registered to the holding, APHA should be notified and the six month test will be cancelled. A new application for re approval of the unit can then be made if required
- the CPH applies to the IU only. It should not be used for any other purpose. If the unit is no longer to be
 used, APHA will temporarily archive the CPH. APHA will also request that RPA archive the CPH. The
 premises can then be managed as part of the original CPH as it was before approval. The IU CPH can then
 be reinstated should re approval be sought and granted in the future.

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