A Step Change in Tackling bTB in Wales: Cattle, People & Wildlife
Initial Advice from the Bovine TB Eradication Programme Board

Introduction

In Wales *Mycobacterium bovis* (*M.bovis*) is almost exclusively the cause of bovine tuberculosis (bTB) in cattle and wildlife, with very occasional cases in people. The World Organisation for Animal Health (WOAH) has specific requirements[1] before a country can be declared Officially TB free. As the Bovine TB Eradication Board outlined in its Position Paper[2] published in Spring 2026, a step change in pace is required if Wales is to achieve its target of being Officially TB Free by 2041.

The TB Eradication Programme Board has received and reviewed evidence from the Bovine TB Technical Advisory Group for Wales (TAG) and has also considered other available evidence and advice, including ethical considerations, the Godfray bTB Review Update (2025)[3], the Bovine TB Control Strategy for England (2026)[4] and the Bovine TB Eradication Strategy for Northern Ireland (2022)[5] and consultation.

These Programme Board recommendations should drive a strategy refresh for the development and implementation of an holistic bTB eradication policy in Wales, which must consider all three populations affected by bTB – cattle, people and wildlife. Scientific evidence and analysis must be deployed to evolve policy, maintaining national controls where appropriate alongside more local and evidence-based interventions that are targeted and proportionate. This should include strengthening the role that farmers and vets can play to keep TB out of herds and manage disease risk where it occurs, working alongside government. Policy and intervention changes should be monitored and evaluated, with clear metrics agreed on what success looks like. It is vital that their impacts are modelled to ensure trade-offs are understood and risks mitigated, so that they can be introduced in sequence to ensure they are effective and do not impact negatively on disease control or business continuity.

Whilst a full strategy refresh is a longer-term goal, there are actions that should be implemented in the shorter term. Therefore, Welsh Government should prioritise:

- A Choice of Approaches for Enhanced Management of Persistent Breakdown Herds
- Changes to Cattle Testing
- Improved access to Biosecure Units and a Biosecure Supply Chain
- A new Advice Service and Increased Farmer and Local Private Vet Involvement
- Improved Access to Data, Risk Information and ibTB
- Collection of Data on the Role of Wildlife in TB to Inform Decisions on Targeted and Proportionate Interventions
- Use of Epidemiological Analyses and Modelling to Understand Drivers of Disease Transmission and to Inform Interventions

These priorities should be supported and strengthened by:

- Preparation for Cattle Vaccination
- A Review of Resolved Severe Interpretation Inconclusive Reactor Policy
- Improved APHA Engagement and Regulatory Support
- Improved Access to TB Information and Advice
- Regulatory Alignment

Further detail on these recommendations is included below.

The Board recommends the following actions in the next six to twelve months:

Cattle:

- **A Choice of Approaches for Enhanced Management of Persistent Breakdown (EMPB) Herds**

Persistent breakdown herds (EMPBs) should be a priority group for accelerated action. Farmers, working closely with their own private vet, should be given the informed choice to:

i. Continue with existing Enhanced Management of Persistent Breakdown protocols

ii. Adopt a new approach to manage TB infection out of their herd through movement restriction and the identification and managed exit of high-risk cattle using TB test data, alongside other measures such as herd biosecurity. The use of private, non-statutory testing such as ancillary blood tests should also be expanded in these herds to allow more proactive disease management Alongside this, the development of any relevant changes to TB policy or rules to take account of the consequences of such changes will require further work. Longer periods between herd-level tuberculin skin tests should be considered in these herds, subject to veterinary and epidemiological assessment.

The protocol for this approach should be informed by the experience and evidence gained through the Pembrokeshire and North Wales Projects and co-created between vets, farmers, APHA and Welsh Government in line with the Godfray Review recommendations (2025).

- **Changes to Cattle Testing**

Options should be developed for the use of different statutory and non-statutory TB tests for surveillance, breakdown management and movement risk reduction.

i. While statutory herd skin testing should be maintained, farmers and vets should be given more choice in TB testing to support earlier detection and improved risk management. For example, allowing access to privately funded ancillary TB testing during breakdowns and in OTF herds would help identify infection earlier and support risk-based decision-making. In OTF herds, individual cattle identified as infected or potentially exposed to bTB, using these ancillary, non-statutory tests, should be managed through individual animal movement restriction and managed exit rather than whole herd restriction. More sensitive tests should also be considered to detect residual cattle infection within herds to reduce the risk of herds returning to restriction. The utility, sequencing and outcome of using alternative tests in these circumstances should be fully explored.

ii. The use of more sensitive pre-movement and post movement tests to reduce risks associated with cattle movements should be assessed. Exploring the use of the same skin test interpretation as used currently before export to Europe, in conjunction with DEFRA, should be a priority. The use of gamma interferon and/or a serological test as a post movement test should also be considered, as recommended in the Godfray bTB Review Update (2025).

- **Improved Access to Biosecure Units and a Biosecure Supply Chain**

For herds under TB restrictions, appropriate commercial outlets for livestock are required that also do not increase the risk of spreading TB through cattle movements.

Challenges around funding, infrastructure and regulatory barriers may limit the development and operation of AFUs (Approved Finishing Units) or other specialist biosecure units for cattle from restricted herds. Ways to increase the uptake, capacity and practicality of a biosecure supply chain, without weakening disease control safeguards, should be explored and an evaluation of whether current rules are proportionate to risk should be undertaken. Joint working with industry and other administrations is essential, including to support cross-border trading and movements and the development of set-up and ongoing compliance processes and requirements.

The use of grant schemes, infrastructure funding and policy incentives to encourage development of such biosecure facilities should be considered and a review of wider regulatory barriers, particularly environmental and agricultural pollution regulations, that may limit development of such facilities carried out, considering if the current rules are proportionate to the risk.

People:

- **A new Advice Service and increased Farmer and Local Private Vet Involvement**

Appropriate biosecurity, including informed purchasing, remains a critical line of defence against the introduction and spread of Bovine TB. Farmer engagement depends on trust, practical relevance and ownership. Communications should use clear, non-technical language, local evidence and quantified business benefits where available. Tailored veterinary advice, farmer involvement in regional disease prevention or control planning, recognition for strong biosecurity practice and financial support for on-farm improvements would help embed biosecurity as a shared culture and practice of disease prevention.

Farmer and vet led projects in Pembrokeshire and North Wales have shown the benefits of upskilled and empowered private vets and farmers working together with greater local ownership of disease management. Lessons learned from farmer and vet led projects should be reviewed and implemented where the evidence supports wider adoption at a local, regional or national level, including enabling farmers, vets and industry stakeholders to establish and lead local TB control and action groups.

The low uptake of Cymorth visits has been recognised by Welsh Government and this visit is only offered following a herd TB breakdown. A new advisory service should be launched urgently with a clear purpose, strengthened content and a field-tested delivery model, supported but not necessarily led by government. The service should be proactive not just reactive and be available to all farms and cattle keepers as a preventative measure to keep TB out, as well as giving support when a breakdown occurs.

- **Improved Access to Data, Risk Information and ibTB**

Farmers, private vets and advisers require improved and timely access to farm-level disease data, epidemiological information and guidance. The Pembrokeshire project has demonstrated the value of farm and animal level data in identifying disease risks and informing management and husbandry decisions that reduce disease and business impact or risk. Lessons and feedback from the Pembrokeshire and the North Wales TB Projects should be reviewed urgently and management options implemented at pace where

evidence supports wider adoption. Equally, innovative methods should be encouraged and used to support a 'learn by doing' approach.

Farmers, private vets and APHA should be enabled to receive and share animal-level TB skin test data in a timely and secure manner to support herd management and trading decisions. An interactive platform should be developed as a priority, where farmers and private vets can see this information. The utility and requirements for farm-level data, such as risk scores, should also be explored.

Individual-animal data for English herds is available on iBTB and equivalent functionality should be extended to Welsh herds as soon as possible, subject to appropriate safeguards against misuse and evaluation of use. This would provide TB data at point of sale so that farmers and other buyers can make informed purchasing decisions.

Support and training should be available to farmers and vets to enable them to understand and use data and information effectively to identify TB risks, make management decisions to reduce risk and work with vets to manage breakdowns effectively.

Wildlife:

- **Collection of Data on the Role of Wildlife in TB to Inform decisions on Targeted and Proportionate Interventions**

Wales will need to develop and implement a policy for the prevention of transmission of *M. bovis* between cattle and wildlife as part of its ambition to gain Officially TB Free Status by 2041. Evidence from across the UK indicates that disease occurrence and transmission are not only multifactorial but also locality specific. Collecting evidence and knowledge of wildlife disease transmission pathways here in Wales must be fully resourced with epidemiological and economic modelling a priority.

Data, including data from the All Wales Badger Found Dead Survey, shows that there is a reservoir of *M. bovis* in the badger. More evidence is needed, including an understanding of badger populations (numbers, TB prevalence and population structure), source attribution and local transmission pathways. These data would identify areas where there is, or is not, evidence of likely transmission of *M. bovis* infection between wildlife and cattle. In turn, this evidence can indicate where proportionate and targeted intervention actions should be taken, inform modelling of different interventions and assist in shaping appropriate delivery and exit strategies. Welsh Government should develop the evidence base to support a range of wildlife options that could be taken forward, making full use of opportunities for collaboration and information sharing.

To understand more about TB in the badger population, Welsh Government should continue to fund and promote the All Wales Badger Found Dead survey, as this is an important bank of information about the disease in the wildlife, and explore the feasibility of surveying wildlife populations, which could include extending the APHA National Badger Sett Survey which is underway in England to cover Wales. Further research on disease transmission will always be needed. However, the requirement for further research should not stall progress.

The role of wild deer in the transmission of bTB is not well understood in Wales. Given the frequent overlap between deer habitats and cattle grazing land and the wider home range of deer, there is a plausible risk of disease transmission between these species. A wild deer surveillance plan should be co-designed and implemented using the expertise and experience of stakeholders to ensure the approach is proportionate, science-informed and locally relevant.

- **Use of Epidemiological Analyses and Modelling to Understand Drivers of disease transmission and to Inform Interventions**

The use of whole genome sequencing (WGS) in both cattle and wildlife supports APHA's Epidemiological Team in the proactive identification of emerging or evolving areas of disease. It would also enable a more holistic approach to disease control using analytical and modelling tools to identify likely source attribution. Where the epidemiological evidence suggests there is a risk of disease circulating between cattle and wildlife, intervention should be taken. Systematic analysis would ensure that the right intervention, with clearly defined metrics, would be deployed, based on the factors driving disease in the local area.

Improved data integration would strengthen disease control efforts too. Bringing together datasets on badger found dead findings, cattle movements, herd bTB breakdowns, deer surveillance and genomic sequencing results into a unified system could support earlier identification of emerging or evolving areas of disease and enable appropriate interventions and monitoring of their effects.

Interventions should be evidence based and include the collecting of relevant data to understand the evolving disease picture and to monitor the impact of the intervention deployed. It should also include an exit strategy. Adequately resourced pilot projects should be used to trial different area-based approaches or interventions, monitored during delivery to evaluate impact and feasibility of scaling up. This will allow a 'learning by doing' approach which will help demonstrate tangible progress and inform strategy reviews and reform.

To Support these Developments the Board also recommends that the following actions should be initiated:

Cattle:

- **Preparation for Cattle Vaccination**

The availability and use of licenced cattle vaccination and DIVA testing as tools within a broader package of control measures must continue to be further developed for use as soon as practically possible in Great Britain. It is also crucial that the expectations around cattle vaccination are managed realistically and that Wales continues to work closely with other administrations of the UK in the development and rollout of a cattle vaccination programme, as disease does not recognise borders and to support trade continuity.

Wales must be 'Cattle Vaccine Ready' – working in partnership. This should include a stakeholder working group, to prepare communications, logistics, data systems, implementation plans and deployment models, including use of Multi Species Wales to record animal-level vaccination status and other disease management information. As recommended by the Godfray Review (2025), given the uncertainties and timescales around the licensing and use of cattle vaccine and a DIVA skin test, considerations should also be given to the development of alternative approaches to enable targeted use of BCG vaccination and DIVA testing sooner in specific, prioritised herd types or settings.

- **A Review of Resolved Severe Interpretation Inconclusive Reactor (IR) Policy**

Published evidence should be reviewed, when available, to consider whether policy on Resolved Severe Interpretation IRs should be aligned with the current Resolved Standard Interpretation IR policy. The review should also consider the current differences in severe

interpretation between Wales and England and if there is a need for alignment.

People:

- **Improved APHA Engagement and Regulatory Support**

Local knowledge should be used systematically to inform delivery. Communication between APHA, keepers and private vets should be strengthened to maximise engagement and support progress towards Officially TB Free status.

In person APHA veterinary visits to farmers at the start of a TB breakdown, including completion of a Disease Report Form, are no longer routinely offered. Direct engagement supports joint risk reduction on the holding and in the surrounding area, and provides stronger epidemiological evidence than information gathered remotely. Initial breakdown meetings should include an assigned APHA case vet, the keeper and the local private vet and take place using a face-to-face platform such as Teams as a minimum. Continuity of Case Vets assigned to a breakdown is crucial for building trust in the process, improving relationships and improving responsiveness. This would have immense benefits for disease control, farmers and APHA.

Communication must be in language and format that is accessible and readily understood, including in Welsh and English, if it is to have maximum impact. This includes verbal and written communications between APHA, farmers and their private vets during breakdowns and movement restrictions.

- **Improved Access to TB Information and Advice**

Information should be easier to find, navigate and access on the Welsh Government website and should be in language that is easily understood. Welsh Government should commit that Wales-specific material will be added to the TB Hub as a trusted source of TB information, evidence, advice and farmer-facing communication, with appropriate resourcing allocated without delay.

Communications should be coordinated across Welsh Government, APHA, private vets and stakeholder bodies. Messaging should be clear, practical and locally relevant, with a focus on explaining the rationale for proposed changes, the benefits for businesses and the role of farmers in disease-control planning.

Implementation should ensure that advice, communications and information are accessible to all affected farmers, including those with limited digital access or differing support needs and should be available in Welsh or English. A peer support system or other networks of information exchange would be of benefit to farmers, prioritising those experiencing a breakdown for the first time. The impact of the disease on mental and physical health is recognised, and it is crucial that support is provided through direct engagement between farmers, local meetings, markets, veterinary practices and industry forums.

- **Regulatory Alignment**

The interaction between bTB control measures and other regulatory requirements, particularly the Control of Agricultural Pollution Regulations, should be reviewed to reduce conflicts that affect individual wellbeing and business decision-making. The environmental risks associated with TB, including farm-yard manure and slurry-related risks, require clearer assessment and guidance.

Governance and Delivery

The Board further recommends that it is vital that:

- Dedicated bovine TB delivery and policy capacity should be maintained within APHA and Welsh Government to avoid loss of focus during competing animal disease pressures.

- Governance should provide clear leadership, accountability and delivery oversight at all levels for bovine TB eradication activities in Wales and will need to evolve from strategy development to delivery.

- The impacts of any policy must be modelled, including a broad cost and benefit analysis and impact assessment covering all parties. This will ensure policy measures are practical, affordable and value for money, the trade-offs are understood and any risks can be mitigated, while recognising the potential long-term savings arising from improved disease control. This, alongside epidemiological information, would support evidence-led policy.

- Policy and interventions must have monitoring mechanisms built in from the start and have clear metrics agreed on what success looks like. Interventions should be evaluated using a broad set of indicators including behavioural change, farmer engagement, veterinary engagement, business resilience and adoption of risk-reduction measures alongside disease reduction outcomes. Monitoring and measurement of interventions, alongside meticulous data collection and the utilisation of epidemiological evidence, will be crucial to assess the effectiveness of any intervention deployed and to inform and enable an adaptive policy and delivery approach.

- Communications making available clear and up to date data and interpretation should be available to all stakeholders, including the public, with key messages explaining the reasons for actions and interventions. A dedicated communications plan for TB should include a programme of case studies and content across platforms like Gwlad, sharing of general information around TB, looking at different issues, including but not exclusively the understanding of residual infection and the issues of false negative test results as opposed to false positives, and improving understanding incrementally.

Conclusion

Achieving a bTB free Wales requires a long-term plan and there must be adequate resources committed and funded across government and industry to achieve that ambitious goal and ultimately reduce the direct and indirect costs of the disease. The recommendations are likely to require additional operational and communications resources by government and different stakeholders, including support for the relaunch of an advice service, Wales-specific TB Hub content, improved data functionality, and potential incentives or support for biosecurity and infrastructure improvements. “Investment now will save money in the future”. (Godfray et al 2025:2)

Collaboration and partnership working at all levels and across administrations is the key to success. The co-creation of TB policies with stakeholders including farmers, vets, industry bodies, wildlife groups, academia, APHA and Welsh Government is important. All stakeholders should communicate constructively and transparently about current and emerging challenges. The disease does not recognise borders so opportunities to

collaborate on research, evidence and sharing of good practice with others should be explored, particularly where beneficial to avoid cross-border livestock movement challenges and testing issues.

The Board, in conjunction with the TAG, will continue to review evidence and consider a number of measures and interventions before preparing further advice on options to reduce bTB in cattle and wildlife and to reduce the risk of transmission between cattle and wildlife.

Glossary

AFU	Approved Finishing Units
APHA	Animal and Plant Health Agency
bTB	Bovine tuberculosis
DEFRA	Department for Environment, Food and Rural Affairs
DIVA	Differentiating Infected from Vaccinated Animals
EMPB	Enhanced Management of Persistent Breakdown
ibTB	An interactive tool mapping bTB outbreaks in England & Wales
IR	Inconclusive reactor
M.bovis	*Mycobacterium bovis*
OTF	Officially TB Free
TAG	Bovine TB Technical Advisory Group for Wales
TB	Tuberculosis
WGS	Whole Genome Sequencing
WOAH	World Organisation for Animal Health

Bibliography:

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[5] The Bovine TB Eradication Strategy for Northern Ireland TB (2022)
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