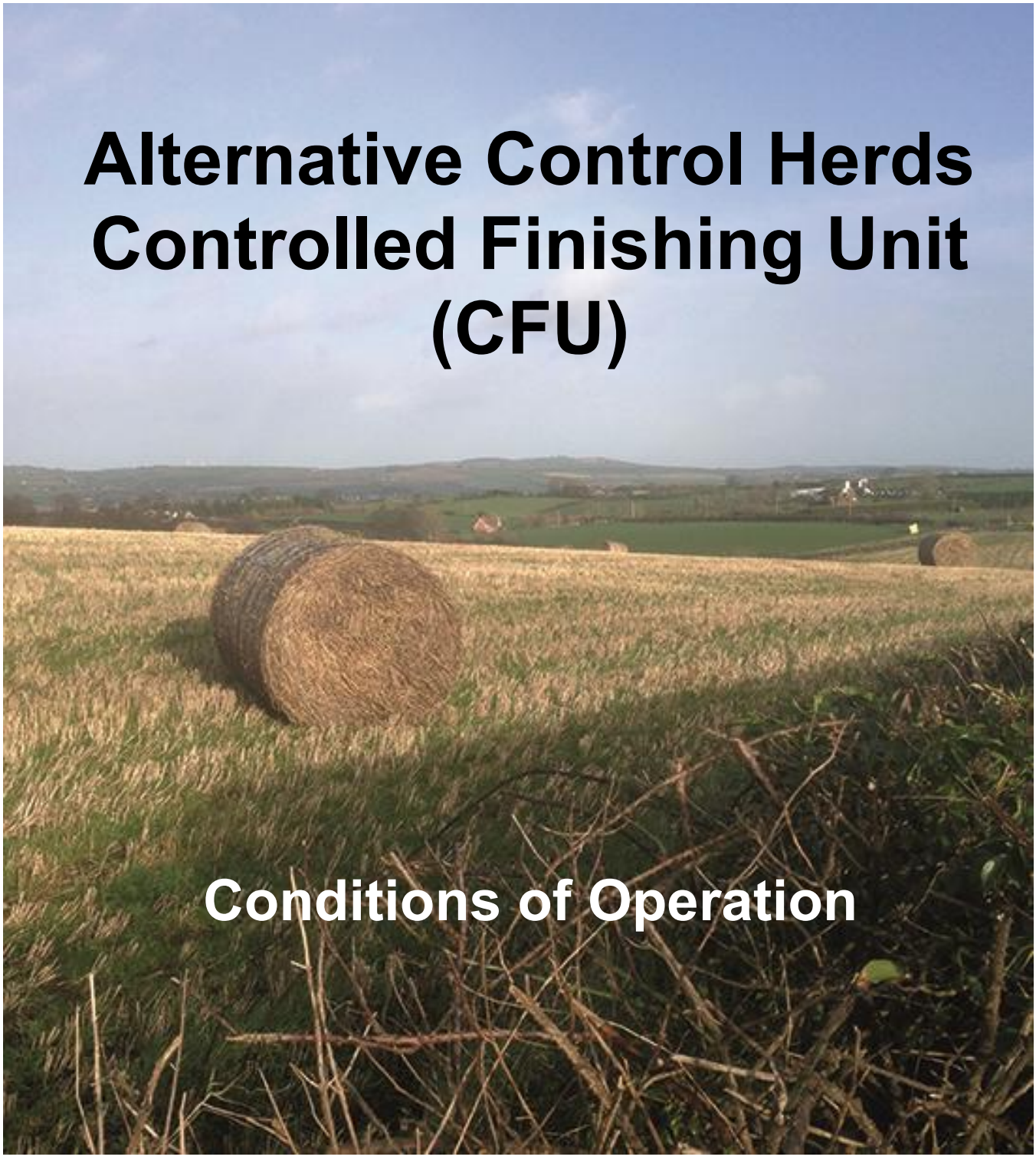
Alternative Control Herds Controlled Finishing Unit (CFU)



Conditions of Operation

Department of
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I. Summary

- Controlled Finishing Units (CFUs) provide a mechanism to address potential welfare concerns by ensuring finisher cattle are not confined to farms where facilities, housing or labour resources, may be inadequate.
- TB control will be by containment rather than the removal of disease.
- The CFU must operate under a standalone dedicated CFU Animal Group Number (AGN), with no co-located cattle or other TB susceptible animals on the premises.
- It is permissible for an out farm to be permitted to operate as a CFU, with shared management across the main herd and the CFU and without herd association, subject to premises specific risk mitigating biosecurity protocols where vehicles or low risk equipment are shared. The fields for spreading slurry or manure must be specifically allocated to the CFU.
- CFUs are by default permanently non grazing herds.
- The CFU will be required to present animals for TB testing annually, unless DAERA requires additional testing.
- The CFU will have a status Officially Tuberculosis Free Withdrawn (OTW).
- Animals can only move from CFUs directly to slaughter in Northern Ireland.
- Strict biosecurity measures must be in place and adhered to at all times.
- The CFU must be re-granted permission to operate annually and will be regularly audited.
- Failure to meet acceptable standards will result in withdrawal of CFU status.

II. The ACH CFU premises

- The CFU premises must be isolated from other TB susceptible livestock and wildlife by design and/or location.
- The CFU housing must be fully compliant with Welfare of Farmed Animals Regulations (Northern Ireland) 2012.
- Grazing is not permitted at any stage.
- The perimeter will be mapped and agreed during the initial inspection process.
- The unit must not be on a yard with a co-located cattle herd. The Animal Group Number (AGN) must be fully dedicated and for sole use of the CFU. As previously mentioned, an out farm may be permitted to operate as a CFU without association to the main herd.
- Cattle accommodation, roughage storage and concentrate feed stores must be constructed, maintained, and operated to continuously exclude wildlife access, e.g. badgers and deer. Examples of how this could be achieved are listed at Annex A.
- Where roughage (e.g. grass or maize silage) is stored on another yard, this must be specified in the application. Using roughage stored in another yard may be permissible

provided that the storage is wildlife proof and additional biosecurity protocols for the transport to and from the CFU are in place, e.g. wheel dips on both yards. Permission to utilise roughage storage outside of the CFU is subject to a satisfactory initial inspection and subsequent audit inspections. Where breaches are found during the audit inspection, this permission may be removed and an alternative process may be required, e.g. store silage bales within the CFU.

- All cattle entering the CFU will be subject to the same restrictions, conditions and testing protocols. There is no option for the AGN to contain co-located bovines not subject to the same conditions as the CFU.
- Adequate facilities and approved disinfectant must always be readily available to effectively cleanse and disinfect vehicles, and equipment/machinery each time they enter and leave the CFU premises.
- Testing facilities, appropriate for the maximum number of animals to be kept, must be available within the wildlife proof area of the CFU premises.
- There must be facilities within the wildlife proof area to store slurry, manure and used bedding sufficient for the maximum number of animals to be kept and the necessary duration of storage.
- There must be sufficient additional space to keep animals within the wildlife proof area of the CFU premises to allow the safe mixing of slurry and annual cleansing and disinfection of the cattle accommodation.
- The CFU premises must have accommodation suitable for the maximum number and type of animals to be kept in the CFU at any time as grazing is not permitted.
- There must be provision within the CFU for the isolation and care of sick/injured animals, including facilities to rear any calves born in the CFU for their lifetime. For calves or lame animals, there must be provision for a bedded isolation area (not slats)
- Signage and other methods must be used to prevent visitors having unrestricted access to the CFU premises.
- Any proposed changes to the ACH - CFU unit or operations must be notified at least 28 days in advance, in writing, to the local office and are subject to an inspection by DAERA officials. DAERA's confirmation of acceptance of the proposed changes is required before the changes can be implemented, unless in the case where a delay may have a direct impact on animal welfare. Failure to give advance notice of changes will be considered a breach of your ACH – CFU permission to operate.

III. Movements in and out

1. General conditions for movements into a CFU

- Animals from OTF herds or imported animals can be moved into a CFU using standard MC2 movement documents.
- Animals from TB restricted herds can be moved under a movement licence issued by DAERA on application, MC2L specific licence.
- There is no upper limit on the number of TB restricted origin herds that can move animals to a CFU.
- There is no age limit for the animals moving into the CFU.
- Animals under individual movement restriction are not permitted to move to a CFU.
- The vehicle must be cleansed and disinfected after unloading and before leaving the CFU.
- The vehicle must leave empty, except if proceeding directly to an abattoir solely with animals intended for delivery there.
- Multiple pick-ups are not allowed.
- TB risk mitigating measures to be assessed prior to issuing a MC2L licence:
    - application herd has completed a full herd test within the previous 30 days of the proposed movement date
    - Animals over 42 days of age moving from TB restricted herds must have had a negative TB test within the previous 30 days.
    - DAERA may refuse applications to move from cohorts from reactors in the breakdown herd where there have been recent reactors.
- Movement between ACH units (e.g. CFU to CFU, CRU to CFU) are not permitted as there is no legal provision to permit these movements.
- Equally, where reactor animals are disclosed within a CRU (Calf Rearing Unit), movements to Controlled Finishing Units (CFUs) are not permitted as:
    - There is no legal provision to move between units.
    - The animals are deemed cohorts of reactors and as such are not eligible for movements to CFUs until the CRU regains OTF status.
- In respect of transport practices, all requirements under The Welfare of Animals (Transport) Regulations (Northern Ireland) 2006 must be complied with. Guidance on welfare in transport processes is available here: Welfare of Animals During Transport | Department of Agriculture, Environment and Rural Affairs

2. Movements out of the CFU

- Only direct movements to slaughter in Northern Ireland are permitted from CFUs, using standard MC2 movement documents.
- Vehicles must transport animals directly from the CFU to the abattoir. No further pick-ups are allowed after leaving the CFU premises.
- Vehicles used to transport animals must be cleansed and disinfected before leaving the abattoir.

IV. Vehicles/equipment

- Equipment should be dedicated to the CFU unless there is a low level of contamination that can be satisfactorily cleaned using a power wash and/or disinfection.
- Contamination should be assessed according to risk e.g. shared feed wagons may be acceptable, whereas shared dung scrapers are not acceptable.
- Any contamination should be dealt with immediately and any shared machinery must be cleaned and disinfected (C&D'd) before leaving the premises.
- Exceptions are vehicles loaded with cattle going directly to an abattoir which must undergo C&D before leaving the abattoir, and machinery doing repetitive work to and from the CFU premises not involving any other farms e.g. slurry spreading or silage harvesting, which must undergo C&D at the end of the day.
- A full and effective biosecurity protocol will be required for shared equipment and records of all cleansing and disinfection must be kept and made available for audit.

V. Disposal of manure/slurry/used bedding/wastewater

- Records of estimated quantities disposed of, and the methods and locations of disposal must be kept and made available for audit.
- Bedding, manure, or slurry may only be disposed of on land owned or rented by the CFU keeper. To note, 'rented' includes written agreements for spreading with for example arable farmers, e.g. cereal growers and others.
- Manure and used bedding must be stacked as a batch for 1 month within the CFU before spreading onto land which is not grazed by TB susceptible species for the following 12 weeks or cut for silage for at least 8 weeks, preferably 12. If manure/bedding is stored for 6 months (no wildlife access) it can be spread with immediate access by TB susceptible species allowed.
- The preferred method for slurry disposal from the CRU house is low emission spreading (dribble bar, trailing hose, trailing shoe), or direct injection during permitted spreading periods onto land which is not grazed by TB susceptible livestock for the following 12 weeks. If slurry is stored for 6 months it can be spread with immediate access by cattle allowed.
- Every effort should be made that slurry spreading is a minimum of 10 meters from the farm boundary. Effort should be made that slurry from the CRU is not spread where neighbouring farms may be grazing livestock within 12 weeks after spreading.

- Where effluent or wastewater drains off e.g. into a soak away ditch, wildlife must not have access and wire, or electrified netting / fencing could be used to prevent such access and to prevent the contamination of the environment and wildlife.
- Depending on the risk assessment at time of the initial inspection, DAERA may require pre-designation of fields used for spreading.

VI. Record keeping

- A written biosecurity protocol must be in place as agreed during the initial inspection and ready for inspection at any audit.
- The biosecurity protocol must include at the very minimum:
  - A unit entry protocol for staff and visitors (permissions, C&D, PPE, etc)
  - Wildlife biosecurity measures
  - C&D protocol and record keeping principles for shared equipment such as machinery, testing facilities, etc
  - Biosecurity protocol and record keeping principles for storage and disposal of slurry/manure/bedding, to include estimated quantities
- All records as required under the CFU Conditions of Operation must be readily available to a DAERA inspector at time of audit. DAERA reserves the right to carry out announced or unannounced audits.
- C&D equipment/vehicles: accurate C&D records must be kept for any vehicle delivering animals to the CFU house, any shared equipment, machinery doing repetitive work to and from the CFU premises not involving any other farms.
- Manure/slurry/bedding: accurate records must be kept for any manure/slurry/bedding originating from the CFU house. These records must include details of estimated quantities disposed of, and the methods and locations of disposal.

VII. People and Health and safety

- Bovine TB is a zoonotic disease. As the CFU may contain TB infected animals, operators must ensure the risk of spread to people is reduced. The minimum requirements are:
  - Staff must wear protective clothing and footwear dedicated for use only on the CFU premises.
  - Visitors must be kept to a minimum and effort made to restrict access. Clothing solely for use on the CFU premises must be worn, with the exception of authorised visitors who may

wear their own waterproofs and rubber boots provided these are fully cleansed and disinfected before leaving the CFU premises.
    - Clothing for use only on the CFU premises must be clearly identified for this purpose.
    - Children should not be permitted access to the CFU animals.
    - Any illness or sickness in people who have had contact with the CFU animals should be reported to a family doctor immediately. They should be made aware of the potential contact with TB infected animals.
    - Any animals showing evidence of illness, particularly illness of a respiratory nature should be isolated immediately, and veterinary advice sought. Protective clothing and enhanced hygiene precautions should be used when dealing with these animals.
- Operating a CFU is a voluntary decision by a herd keeper to keep cattle under conditions which may be different to the normal farming practices on that premises. It is the CFU operator's responsibility to carry out the appropriate risk assessments and to develop safe systems of working.
- Advice from the Public Health Agency is available here: Bovine tuberculosis - reducing the risk of human infection leaflet | HSC Public Health Agency

VIII. Testing, Cleansing & Disinfecting (C&D) and compensation

- The CFU will be required to present animals for TB testing annually, unless DAERA requires additional testing.
- Overdue annual TB testing may result in the permission to operate a CFU being denied and 'Severe TB status' being applied to the CFU to prevent buying in.
- Annual cleansing and disinfecting (C&D), including DAERA inspection, of all cattle housing, loading areas, collection pens and testing facilities is required. This may be achieved over a certain time period and inspected in sections, or in one process at times of low stock numbers. It is advised to liaise with your local DVO to ensure timely inspection is carried out. Where the annual C&D has not been completed and inspected at time of status renewal, the permission to operate a CFU may be denied until such time a satisfactory C&D has been completed. Severe TB status may be applied to the CFU to prevent buying in until compliance has been achieved.
- TB reactors/lesions at slaughter will be subject to standard backward trace procedures
- Disclosure of reactors or lesions at routine slaughter will not usually trigger breakdown herd testing at the CFU, however, this will be at the discretion of DAERA should a risk assessment determine that additional testing in the CFU is required.
- Forward traced animals (CTTs) will not be tested.
- Private TB testing is not permitted in the CFU.

- Under current legislation compensation will be paid by DAERA for animals requiring compulsory slaughter.
- Loss of carcass value is solely at the herd keeper's own risk.

IX. Granting permission to operate a CFU and Audit

1. CFU status

- Operation of a CFU is entirely voluntary and requires the herd keeper to agree with the specific controls required to contain disease within the CFU premises.
- The CFU will be require permission granted to operate by DAERA on an annual basis.
- The CFU must operate under a standalone dedicated CFU Animal Group Number, with no co-located cattle or other TB susceptible animals on the premises.
- Applications will be subject to a veterinary risk assessment and inspection by the local Divisional Veterinary Office. Any recommendations arising from this must be implemented. Failure to do so will result in an application being refused or withdrawn as appropriate.
- Applications where herds have cattle movements or other practices considered high risk for the potential spread of disease will be refused.
- Applicants with a poor compliance history concerning overdue TB testing, animal health, traceability and welfare will be refused.
- Applications must include:

    a. a site map including location of the CFU buildings housing cattle within the premises
    b. any other farm buildings and all land parcels linked to the premises
    c. detail of biosecurity measures applied to control wildlife access
    d. C&D protocol and record keeping principles for shared equipment such as machinery, testing facilities, etc
    e. biosecurity protocol and record keeping principles for storage and disposal of slurry/manure/bedding, to include estimated quantities and storage locations

2. Audit

- The CFU premises will be regularly audited.
- Audit visits may be unannounced and may be made at 3-4 monthly intervals per year to verify compliance.

- A minor breach is a breach where it is unlikely to have had an impact on TB spread from the CFU, e.g. documentary issues (see examples below).
- A major breach is a breach that could have resulted in TB spread from the CFU (see examples below).
- Evidence of possible contact between CFU animals and other TB susceptible livestock will be considered a major breach and may result in the immediate withdrawal of CFU status.
- This may result in immediate additional testing and to prevent further animals moving in, the herd may be initially given a status of "OTW – Severe breakdown"
- Evidence of a minor breach will result in a warning letter requiring corrective action and potentially follow up inspections and/or more frequent audit visits.
- Evidence of unresolved, repeated or several minor breaches (3 or more during the CFU operating period) may result in immediate withdrawal of CFU status and the potential to have any future applications refused. The AGN may revert to normal OTW testing requirements and may no longer be permitted to source stock from non-OTF herds.
- Enforcement action for minor breaches may also include the application of a 'Severe TB breakdown' status to prevent further buying into the unit until compliance has been achieved.

3. Examples of minor breaches

- C&D of vehicles not completed as agreed in the CFU Protocol.
- Incomplete recording of the C&D of vehicles or the CFU premises.
- Cattle handling/testing areas, concentrate feed storage or slurry/manure/used bedding storage areas not maintained and/or operated to continuously exclude badgers and deer.
- Inadequate facilities for the C&D of vehicles.
- Insufficient approved disinfectant.
- Number of animals in the CFU greater than what can be expected in line with welfare conditions.
- Disposal of manure/slurry by methods other than as recorded in the CFU Protocol.
- Staff not wearing dedicated clothing which is solely for use in the CFU.
- Visitors not wearing either dedicated clothing or clean waterproofs and rubber boots which are fully cleansed and disinfected before leaving the CFU premises.
- Any amendment to the CFU Protocol which has not been agreed by the local DVO.

4. Examples of major breaches

- CFU cattle outside the agreed wildlife proof perimeter.
- Non-CFU cattle or other TB susceptible species within the agreed CFU premises perimeter.

- Possibility of direct contact between CFU cattle and non-CFU cattle or other TB susceptible species.
- Refusal to complete the required herd test of CFU cattle or additional testing if required by DAERA in exceptional cases.
- Unidentified animals in the unit.
- Any attempt at fraud
- Additional collections on other cattle premises for livestock vehicles transporting animals to slaughter

X. Exit from CFU requirements

- When a herd keeper wishes to stop operating as a CFU this intention must be made at least 28 days in advance in writing to the local Divisional Veterinary Officer.
- The default position is that the CFU will be depopulated at the cost of the operator followed by a thorough cleansing and disinfecting process (C&D), and to prevent further animals moving in, the herd will be initially given a status of "OTW – Severe breakdown" while depopulation takes place. If there has been evidence of very high levels of infection in the herd at the time of depopulation the premises may be required to observe a no stock (fallow) period following depopulation and C&D.
- Consideration may be given in exceptional cases to allow the premises to exit the CFU by management as an OTW breakdown. This is subject to permission from TB Programme DVO/SPVO. The status 'OTW – Severe Breakdown' will still be applied at least until completion of an RH1 under severe interpretation allocated to a DAERA testing officer (TVOT) with an RH1 test due date set at 90 days from the date of status change, and completion of a full C&D. No RHT will be set.
- In either case cattle housed on the premises will require to remain housed until depopulation or the completion of the RH1 test.

XI. Other

- CFUs will be non-breeding herds although it is accepted that there will be occasional calves born on the unit, and, unless the calves will be euthanised, facilities must be available to accommodate any calves born **for their lifetime**.
- Cattle Identification, Cross Compliance, welfare and other disease control (e.g. Brucellosis, BVD) requirements will remain unchanged within an CFU.
- Usual identification requirements for cattle moving from the CFU to slaughter will apply.

- DAERA reserves the right to review the permission to operate a CFU at any stage of the process and implement additional risk mitigating measures when deemed necessary.
- Conditions of operation will be kept under review. Any changes will be notified and communicated to allow sufficient time for implementation.

Annex A

Examples of measures to make the cattle accommodation and concentrate feed stores badger and deer proof:

- Sides of the building should not be open at ground level, but of a smooth and solid construction (i.e. not to allow wildlife to get a purchase) and be greater than 1.5m high.
- 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 barred gate) and closed when not in use. If a door cannot be closed for ventilation purposes, then an alternative means of preventing wildlife entry must be used at that point e.g. a sheeted gate.
- Gaps at the sides and under doors/access points and walls should be no greater than 7.5 cm and must not be able to be enlarged by digging or chewing.
- Where effluent or wastewater drains into a soak away ditch, wildlife must not have access and wire, or electrified netting / fencing could be used to prevent such access and to prevent the contamination of the environment and wildlife.
- An alternative to adapting individual buildings and securing feed and by-product storage areas, etc is to ensure a wildlife resistant boundary to the whole CFU premises (e.g. electrical fencing). Any boundary fencing intended as the wildlife control point must eliminate the possibility of access to the premises by badgers and deer. Guidance is available here: Fact-sheet-6.pdf

For further information:

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