Alternative Control Herds Calf Rearing Unit (CRU)



Conditions of Operation

Department of
Agriculture, Environment and Rural Affairs
An Roinn
Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe
Depairtment o'
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Contents

I. Summary 2
II. The CRU premises 3
1. Structural unit requirements for both types of CRU 3
2. Additional unit requirements for the higher-level biosecurity CRU, permitting standalone CRU units within a premises with other bovines 5
III. Movements in and out 6
1. General conditions for movements into an AGN with a CRU unit 6
2. TB restricted herd origin calves 8
3. Movements out of an AGN with a CRU unit 8
IV. Vehicles and Equipment 9
V. Disposal of manure/slurry/used bedding/wastewater 9
VI. TB testing schedule under CRU operations 10
VII. Record keeping 11
VIII. People and Health and Safety 12
IX. Compensation 13
X. Granting permission to operate a CRU, Audit and Enforcement 13
1. CRU Status 13
2. Audit and enforcement 14
3. Examples of minor breaches 14
4. Examples of major breaches 15
XI. Exit from CRU requirements 15
XII. Other 15
XIII. Annex A – overview flowchart of CRU process 16
XIV. Annex B – Template Record CRU Stock 17

I. Summary

- Calf Rearing Units (CRUs) provide an outlet for the rearing of clear tested low risk young cattle from TB restricted herds. This mechanism addresses potential welfare concerns by ensuring calves are not confined to farms where facilities, housing or labour resources may be inadequate.
- The CRU will be audited prior to being granted permission to operate and may be subject to additional audits during the period of operation.
- Only Officially Tuberculosis Free (OTF) Animal Group Numbers (AGNs) may apply for a CRU permission to operate; applications from Officially Tuberculosis Suspended (OTS) or Officially Tuberculosis Withdrawn (OTW) AGNs will not be considered.
- CRUs will have the overarching principle to work towards regaining OTF status.
- Co-located cattle are permitted on the premises under the same AGN, but all co-located bovines within the AGN and any associated AGNs will be under the same OTW restrictions and associated testing regime once CRU status has been applied.
- Alternatively, a standalone AGN can be applied for, subject to high biosecurity conditions, for sole use as CRU without co-located cattle on site, as long as the CRU premises is strictly isolated. Strict isolation requires as a minimum a separate entry into the CRU, not transiting any area of the main yard housing a co-located herd or other CRUs, and requires certain dedicated equipment. There may be a certain level of overarching shared management between the CRU herd and another AGN. Where at any stage strict separation is not complied with, the CRU application will either be denied or the AGNs will become associated for disease control purposes and any future CRU applications will be refused.
- OTF status can only be regained in line with the required clearance testing protocols. It is intended that the CRU status on a premises is a temporary status. Once these units regain OTF the CRU status will be removed and all animals within the CRU will be eligible for the open market.
- In the case of disclosed reactors during any of the tests, the relevant cleansing and disinfecting (C&D) will be required prior to regaining OTF and the relevant CHT (Check Herd Test) will also be required after OTF status has been restored.
- Re-application will be required if a new cycle of movements of TB restricted calves is intended once OTF has been regained.
- Any calf entering the dedicated CRU housing, that did not originate from a TB restricted herd, will be subject to the same restrictions and protocols as the CRU TB breakdown origin calves.
- For as long as the CRU status is in place, only movements from the AGN to slaughter are permitted. Movements to another CRU or to a Controlled Finishing Unit (CFU) are not permitted.
- Strict biosecurity measures must be in place and adhered to at all times.

- Failure to meet acceptable standards may result in refusal of future CRU applications and additional restrictions or testing.
- If the co-located cattle herd discloses TB reactors, the CRU status and operating conditions will remain in place until all calves within the CRU have completed the 2 full unit test requirements. At that point, if the CRU has completed 2 clear full unit tests under severe interpretation, the CRU status will be lifted. The full herd AGN will not regain OTF but remain under the relevant OTW restrictions until any additional actions to regain OTF have been completed. See Annex A
- If the CRU discloses TB reactors at any of the 2 clearance tests, the CRU status and biosecurity restrictions will remain in place. Reactor animals will be valued and slaughtered and additional CRU and herd testing of the remaining animals will be required until the CRU has completed 2 clear tests under severe interpretation and a C&D process. See Annex A.
- 2 different types of CRU status can be granted:
  - Standard biosecurity
  - High biosecurity
- The standard biosecurity one requires the full premises, including any co-located herd or other standard biosecurity CRUs on the same premises, to operate under the same OTW restrictions and testing regime.
- The high biosecurity level requires stricter biosecurity levels and a separate AGN, allowing the unit to operate as a standalone unit, even where a co-located herd or other CRUs are present on the same premises. This is further described under section II.
- Maximum number of animals restrictions will be stipulated for the CRU and recorded within the letter granting permission to operate a CRU, in line with space requirements as stipulated under Welfare of Farmed Animals Regulations (Northern Ireland) 2012

II. The CRU premises

1. Structural unit requirements for both types of CRU

- The CRU is a bio-secure calf rearing unit operating independently as a separate building/airspace from any co-located bovines and susceptible non-bovines on the same premises.
- There must be no direct or indirect contact possible with co-located or neighbouring cattle or other TB susceptible species, including wildlife.
- The CRU housing must be fully compliant with Welfare of Farmed Animals Regulations (Northern Ireland) 2012.
- The housing must be easy to clean and disinfect (C&D) and there must be equipment available with pressurised water systems to perform C&D.

- The unit must undergo C&D before permission to operate can be granted.
- Upon arrival at the CRU, all calves must be housed in a dedicated housed rearing unit and remain indoors for the duration of the CRU operation; no grazing for any animals within the CRU is permitted at any stage during the time period the CRU is in operation.
- The housing unit must be of a suitable size to accommodate the number of growing calves in the event the CRU batch would not return two consecutive clear tests to allow derestriction at the earliest opportunity. Minimum space requirements for calves are laid down under Schedule 6 of the Welfare of Farmed Animals Regulations (Northern Ireland) 2012. Alternatively, where a CRU remains restricted longer than anticipated, an additional unit may be added onto the original application, providing the additional premises complies with the CRU Conditions of operation, has been inspected and permission granted by DAERA. Written permission must be obtained from the local DVO before movement into the additional unit is permitted.

- It may be permissible to re-purpose a building or shed between more than one high biosecurity CRU, subject to thorough C&D and approval following inspection by DAERA officials. For example, to facilitate the different environmental and feeding requirements for growing calves within a production cycle. Any premises added must meet the relevant ACH CRU requirements and additional conditions specific to the CRU may be added to the original CRU permission.
    - The request to remove the building from one CRU and add it onto another CRU must be submitted to the local DVO that has issued the CRU permission
    - The application for the second CRU must be submitted, specifying on the site map that is submitted along with the application that one of the buildings is to be repurposed from another high biosecurity CRU
    - Prior to inspection the building that is to be repurposed must be vacated and thoroughly C&D'd.
    - Following a satisfactory inspection the building will be removed from the first CRU and included in the second CRU.

- The housing dedicated to CRU calves must:
    - Be a separate airspace from any co-located cattle.
    - Be secure with all efforts made to minimise wildlife access into the building:
        - Gaps at the sides and under doors/access points and walls should be no greater than 7.5cm and must not be able to be enlarged by digging or chewing.
        - Sides of the building should not be open at ground level and be 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.

- Electric or other fencing may be used around the perimeter of the cattle housing to prevent access by badgers. It is important to note that strands of wire should be at 10, 15, 20 and 30cm above the ground to prevent badger access. Guidance is available here: Fact-sheet-6.pdf

- Have signage or other methods to minimise the risk of visitors having unrestricted access to the CRU premises.
- Have provision for the isolation and care of sick/injured animals within the unit.

- There must be no drainage of effluent or wash offs from the unit into areas where TB susceptible stock (which includes sheep, pigs, goats and camelids, farmed or park deer) and/or wildlife have access.
- The provision and maintenance of adequate testing facilities is essential:
  - A mobile chute which is subject to thorough cleansing and disinfection will be acceptable in the calf rearing unit.
  - Where shared testing facilities are used with co-located cattle, the CRU housed calves must be tested last, ensuring there is no contact with the co-located cattle at any stage and the testing facilities and passages are thoroughly cleansed and disinfected immediately after use. This must be fully documented in the biosecurity protocol submitted at time of application. C&D records must be kept each time the testing facilities are used within the CRU.

2. Additional unit requirements for the higher-level biosecurity CRU, permitting standalone CRU units within a premises with other bovines

- The primary principle for disease control requires association of all units and co-located herd within one premises, and operationally the status is applied on NIFAIS to the main AGN of the herd
- It is possible to operate a separate AGNs for each CRU within a premises, or to apply full separation of the co-located herd and any CRU(s) within the same premises, subject to compliance with the higher biosecurity conditions as stipulated. Please note, these conditions may be adjusted in line with the structure/lay-out/management of the herd so as to ensure full separation and as such each application will be assessed in its own right with the relevant conditions stated.
- The proposed approach is deemed compliant with the requirements for disease control approach for epidemiological units under Animal Health Law EU Regulation 2016/429. Reference to Commission Delegated Regulation (EU) 2020/689, articles 20, 21 and 23.
- Operationally, where separation between CRUs and/or co-located herd is requested, a separate AGN will be required for each individual higher biosecurity CRU operation.

- Premises and CRU minimum specifications in addition to the existing conditions of operation for a CRU to allow separation without association:
  - Fully separated entry/exit pathway for the CRU, with unloading facilities, to ensure no animals or vehicles pass through other parts of the yard when entering the CRU, with no potential for mixing/direct/indirect contact with any other animals on the premises.
  - No shared testing and/or handling facilities. Each unit must have its own dedicated testing and handling facilities
  - Clearly labelled and controlled entry/exit points into the unit for animals and staff. There should be no uncontrolled access into the unit from anywhere within the establishment.
  - The required PPE and disinfecting requirements should be clearly displayed in writing at the staff entry of the unit
  - Dedicated staff changing facility at the entry point of the unit, prior to entering and exiting the animal housing area, with a hand and boot wash station and a full change of staff PPE dedicated to the unit. It is permitted to operate a system of disposable PPE when entering the unit, e.g. disposable overshoes and overalls.
  - Secure storage for disinfectants and chemicals within the unit
  - Secure storage of feed, bedding and animal waste material within the unit
- Where non-compliances are found during inspections, there is the risk that the CRU may become associated to the other cattle AGNs on the premises and all associated units revert to the highest risk disease status and testing regime. As per standard CRU protocol, non-compliances may result in refusal of future applications.

III. Movements in and out

1. General conditions for movements into an AGN with a CRU unit

- Movements into the co-located herd from non-TB restricted herds may continue as per normal procedures.
- All movements into the CRU must take place within a 42-day window from date of CRU status application. Once the 42-day window has closed, no movements into the CRU unit are permitted from either OTF or OTS/OTW herds or from the co-located animal group. Movements continue to be permitted into the co-located herd. Compliance will be verified during audit inspections.
- Accurate records for the calves in the CRU unit must be kept for the duration of the operation, detailing:
  - Animal Group Number
  - Date first animal moved in
  - Date the last animal entered the unit, or date the 42-day movement-in window closed, whichever comes first
  - Animal tag number

  - Breed/sex/colour
  - Date moved in
  - Date of death, if applicable

  A record template is available under Annex B
- Animals under individual movement restriction are not permitted to move to a CRU.
- Only calves up to 60 days of age are permitted to be moved into the CRU. This applies both to calves from TB restricted and calves from TB Free herds!
- Movements into the CRU from OTF herds may continue as per normal procedures within the 42-day window, no additional permissions or licences are required.
- In respect of minimum age for movement into the CRU, all requirements under The Welfare of Animals (Transport) Regulations (Northern Ireland) 2006 must be complied with when moving young animals. This includes but is not limited to:
  - they are not new-born mammals in which the navel has not completely healed
  - calves of less than ten days of age are not transported, unless they are transported less than 100 km
  - they are not animals that have been submitted to veterinary procedures in relation to farming practices such as dehorning or castration, unless if wounds have completely healed
  - calves of less than six months of age shall be provided with appropriate bedding material or equivalent material which guarantees their comfort appropriate to the species, the number of animals being transported, the journey time, and the weather. This material has to ensure adequate absorption of urine and faeces.
  - Space allowances as follows for transport by road:

Category	Approximate weight (in kg)	Area in m^2/animal
Small calves	50	0,30 to 0,40
Medium sized calves	110	0,40 to 0,70
Heavy calves	200	0,70 to 0,95

Further guidance on welfare in transport processes is available here: Welfare of Animals During Transport | Department of Agriculture, Environment and Rural Affairs

- Movements into the CRU from TB restricted herds (OTS/OTW) are subject to local DAERA DVO approval using the MC2L specific licence.
- Multiple pick-ups are not permitted.
- All transport must be in compliance with The Welfare of Animals (Transport) Regulations (Northern Ireland) 2006.

- If the last calf enters the unit ahead of the 42-day movement window, DAERA should be notified to assess and, where necessary, amend the RH1 test date to be set for 90 days from the date of last movement into the CRU.

2. TB restricted herd origin calves

- There is no upper limit on the number of TB restricted herds the CRU can source calves from but a risk assessment on the feeder herd will be carried out by the local DVO before the MC2L specific licence will be issued.
- This risk assessment may include the following checks:
    - Are the calves cohorts of TB reactors?
    - Do the calves have shared airspace or direct contact with TB reactor animals?
    - Did the dam test TB positive?
    - Have any of the calves received unpasteurised milk/colostrum from a reactor animal?
- Depending on the outcome of the initial risk checks, additional herd level risk factors may also be considered such as for example:
    - Severity of TB breakdown, e.g. number of reactors overall or at last test, chronic breakdowns, recurrent breakdown
    - Movements in/out
    - High local TB levels
- No pre-movement testing is required for calves up to 42 days of age.
- Calves between 42 and 60 days of age must complete a pre-movement test under severe interpretation. DAERA permission to test as a Private Check test (PCT) must be applied for and granted prior to commencing pre-movement testing. Any such pre-movement testing is at owner's expense.
- Refused movement applications for a MC2L specific licence following the outcome of the disease risk assessment will be assessed on a case-by-case basis. Such movements will require the consideration of exceptional welfare circumstances and, if permitted, may require the application of a more stringent biosecurity approach than the CRU conditions of operation. For example, the CRU may require to be restricted to only house animals originating from the breakdown herd where the movement application was refused.

3. Movements out of an AGN with a CRU unit

- For as long as OTW status is in place under the CRU operation, in respect of animals in a co-located herd (not part of the CRU) under the AGN, only direct movements from animals in the co-located herd to slaughter or a Controlled Finishing Unit (CFU) are permitted. To note, only movements to slaughter are permitted for animals from within the CRU.
- No additional pick-ups are permitted when moving cattle to slaughter.

- Once the full AGN (any co-located bovines and the CRU calves) have completed the 2 required clearance herd tests, the OTW status will be withdrawn, and the CRU permission to operate will cease. All animals within the OTF AGN, including the CRU calves will then be eligible for the open market and able to mix freely with co-located bovines.
- In case of associated AGNs, animals are not permitted to move to any of the associated AGNs for as long as the CRU status is active and OTW movement restrictions apply. The main AGN and all associated herds will be under the one OTW restriction for the duration of the CRU operation.
- If calves within the CRU test positive, backwards tracing will apply.
- Where reactor animals are disclosed within the CRU, movements for animals within the CRU 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.

IV. Vehicles and Equipment

- Equipment should be dedicated to the standard biosecurity CRU unless there is a low risk level of contamination that can be satisfactorily cleaned using a power wash and/or disinfection:
    a. The sharing of equipment used for the CRU with another AGN operator is not permitted for as long as the CRU status is in place.
    b. Calf feeding troughs and drinking equipment must be dedicated to the unit for as long as the CRU status is in place.
    c. 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 before leaving the premises.
- All vehicles delivering calves to the CRU must undergo C&D before leaving the premises.
- Vehicles transporting cattle directly to slaughter must undergo C&D before leaving the abattoir.
- Machinery doing repetitive work to and from the CRU premises, e.g. slurry spreading or silage harvesting, must be C&D at the end of the day.
- A full and effective written biosecurity protocol will be required for shared equipment and records of all C&D of shared equipment must be kept and made available for audit.
- Additional requirements apply for high biosecurity level CRUs (see section II)

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

- Record keeping;
    - Required for the CRU unit only.

  - Records of estimated quantities disposed of, and the methods and locations of disposal must be kept and made available for audit.

- Disposal principles:
  - Bedding, manure, or slurry from the CRU house may only be disposed of on land that is owned or rented solely by the CRU keeper. To note, 'rented' includes written agreements for spreading with for example arable farmers, e.g. cereal growers and others.
  - Manure and used bedding from the CRU house must be stacked as a batch for 1 month within the AGN premises or premises agreed and designated by DAERA before spreading onto land which is subsequently 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.
  - If manure/bedding is stored for 6 months (no wildlife access) it can be spread with immediate access by cattle 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 (e.g. cattle, sheep, camelids, etc.) for the following 12 weeks. If slurry is stored for 6 months it can be spread with immediate access by cattle or other livestock allowed.
  - Every effort should be made that slurry spreading is a minimum of 10 meters from the farm boundary. Efforts should be made so that slurry from the CRU is not spread where neighbouring farms may be grazing livestock within 12 weeks after spreading.

- Depending on the risk assessment at time of the initial inspection, DAERA may require pre-designation of fields used for spreading.
- Where effluent or wastewater drains off from storage locations 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.
- Once the CRU status has been withdrawn, any additional requirements in relation to slurry/bedding/manure are also withdrawn.

VI. TB testing schedule under CRU operations

- OTW status will be applied at time of CRU status application and the 1st RH1 herd test under severe interpretation will be set with a due date of 90 +42 days (132 days) from date of CRU status and application of OTW status. Any movements into the CRU are only permitted between the date of CRU status application up to 42 days after CRU status application.

- All cattle within the AGN and CRU will be on the same testing schedule. The second test, also read under severe interpretation, will have a due date of 90 days from completing the first test, as per normal procedures.
- Where the last calf has entered the unit before the 42-day window has ended, the operator may notify DAERA with a view to re-assess the RH1 due date and, where possible, amend the due date to 90 days from when the last calf entered the unit. The dates will be verified during audit inspections.
- Private TB testing is not permitted in a CRU.
- If the CRU discloses TB reactors at any of the 2 clearance tests, the CRU status and biosecurity restrictions will remain in place. Reactor animals will be valued and slaughtered and additional CRU and herd testing of the remaining animals will be required until the CRU has completed 2 clear tests under severe interpretation. In this scenario, full C&D of the CRU will also be required before OTF can be granted. Once OTF has been regained, a 6-month CHT test will be set, in line with normal TB breakdown procedures.
- If the co-located cattle herd discloses TB reactors, the CRU status and biosecurity requirements will remain in place until all calves within the CRU have completed the 2 full unit test requirements. At that point, if the CRU has completed 2 clear full unit tests under severe interpretation, the CRU status will be lifted. The full herd AGN will not regain OTF but remain under the relevant OTW restrictions until any additional actions to regain OTF have been completed.

VII. Record keeping

- 3 types of records are required for the CRU:
  - CRU animal records
  - CRU storage and disposal records for used bedding/manure/slurry
  - CRU shared equipment biosecurity records
- A written biosecurity protocol must be in place prior to permission being granted to operate a CRU and the protocol must be available for inspection at any audit.
- The biosecurity protocol must include at the very minimum:
  - A unit entry protocol for staff and visitors (access permissions and signage, C&D, Personal Protective Equipment, etc)
  - Wildlife biosecurity measures
  - C&D protocol and record keeping principles for low risk shared equipment such as machinery, testing facilities, etc. High risk equipment (e.g. calf feeding equipment, dung scrapers, etc) must not be included in the shared equipment permissions and biosecurity protocol
  - Biosecurity protocol and record keeping principles for storage and disposal of slurry/manure/bedding, to include estimated quantities

- Accurate records for the calves in the CRU unit must be kept for the duration of the operation, detailing at least:
    - Animal tag number
    - Breed/sex/colour
    - Date moved in
    - Date of death, if applicable
    - Date the last calf entered the unit, or the date the 42-day movement in window closed, whichever comes first

  A template is available under Annex B
- C&D details for each use of shared equipment must be kept (date/type of equipment/C&D details/staff details)
- All records as required under the CRU operation must be readily available to a DAERA inspector at time of audit. DAERA reserves the right to carry out announced or unannounced audit inspections.

VIII. People and Health and Safety

- Bovine TB is a zoonotic disease. As the CRU may contain TB infected animals, operators are responsible to ensure the risk of spread to people is reduced. Guidance on the minimum requirements are:
    - Staff must wear protective clothing and footwear dedicated for use only on the CRU premises.
    - Visitors must be kept to a minimum and effort made to restrict access. Clothing solely for use on the CRU premises must be worn, except for authorised visitors who may wear their own waterproofs and rubber boots provided these are fully cleansed and disinfected before leaving the CRU premises.
    - Clothing for use only on the CRU premises must be clearly identified for this purpose.
    - Children should not be permitted access to the CRU animals.
    - Any illness or sickness in people who have had contact with the CRU 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 CRU 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 CRU 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

IX. Compensation

- 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.

X. Granting permission to operate a CRU, Audit and Enforcement

1. CRU Status

- Operation of a CRU is entirely voluntary and requires the herd keeper to agree with the specific controls required to contain disease on the CRU premises.
- Applications must include:
    a. a site map including location of the CRU house within the premises
    b. a biosecurity protocol, to include at the 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
    c. any other farm buildings and grazing parcels on site
- Applications will be subject to a DAERA inspection and inspection by the local Divisional Veterinary Office. Any recommendations arising from this must be implemented within the timeframe specified before permission to operate can be granted. Failure to do so will result in an application being refused or withdrawn as appropriate. A new application will be required if the operator wishes to be reconsidered for a CRU operation.
- Applications where herds have 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.
- CRU applications may only be made in respect of bovine Animal Group Numbers and are authorised solely for cattle. They can only be authorised on an OTF holding.
- Date of intended first movement in will require to be included in the application, which will be taken as the date on which the CRU status and OTW restriction will be applied. This applies to any type of movement, including those from OTF herds.

- Where reactors are disclosed within a CRU and longer-term space/welfare issues are anticipated, e.g. the accommodation design is not suitable for older cattle, then, upon written request from the operator, the original application may be reviewed by DAERA to add additional premises/structures to the CRU operation. The onus and responsibility to identify the additional accommodation remain fully with the operator. The additional accommodation will be subject to the same operational and structural conditions as the original accommodation. The additional accommodation may be within the same premises or at a separate location and conditions for transport will need to be agreed with the local DVO.

2. Audit and enforcement

- The CRU premises may be regularly audited during a cycle of operation.
- Audit visits may be unannounced to verify compliance with the CRU - Conditions of Operation
- A minor breach is a breach where it is unlikely to have had an impact on TB spread from the CRU, e.g. documentary issues.
- A major breach is a breach that could have resulted in TB spread from the CRU.
- Evidence of possible contact between CRU animals and other TB susceptible livestock before 2 clear tests will be considered a major breach and may be subject to potential additional testing requirements/restrictions. No future applications will be considered where major breaches were disclosed.
- Evidence of a minor breach may 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 CRU approval period) may result in a major breach being applied and the potential to have any future applications refused as well as to potential additional testing requirements/restrictions.
- Where breaches are found for multiple CRUs and/or co-located herd within one premises, operating as separate AGNs without association, there is the risk that CRUs/co-located herd may become associated and all associated AGNs revert to the highest risk disease status and testing regime. As per standard CRU protocol, non-compliances may result in refusal of future applications.

3. Examples of minor breaches

- Incomplete record keeping
- Inadequate cattle handling/testing areas.
- Number of animals in the CRU greater than the permitted maximum as per welfare standards. Please note, welfare legal compliance breaches may be considered in this scenario, in addition to CRU conditions of operation breaches.
- Any amendment to the CRU Protocol which has not been agreed by the local DVO (minor or major depending on potential of disease spread risk).
- Sharing of equipment outside of the agreed biosecurity protocol.

4. Examples of major breaches

- Evidence of possible contact between CRU animals and other TB susceptible livestock before two clear tests.
- Evidence of wildlife access into the unit due to non-compliance with biosecurity requirements.
- Animal identification(IRM) breaches or welfare breaches
- Animals reported as lost/stolen or failed to be presented for testing.

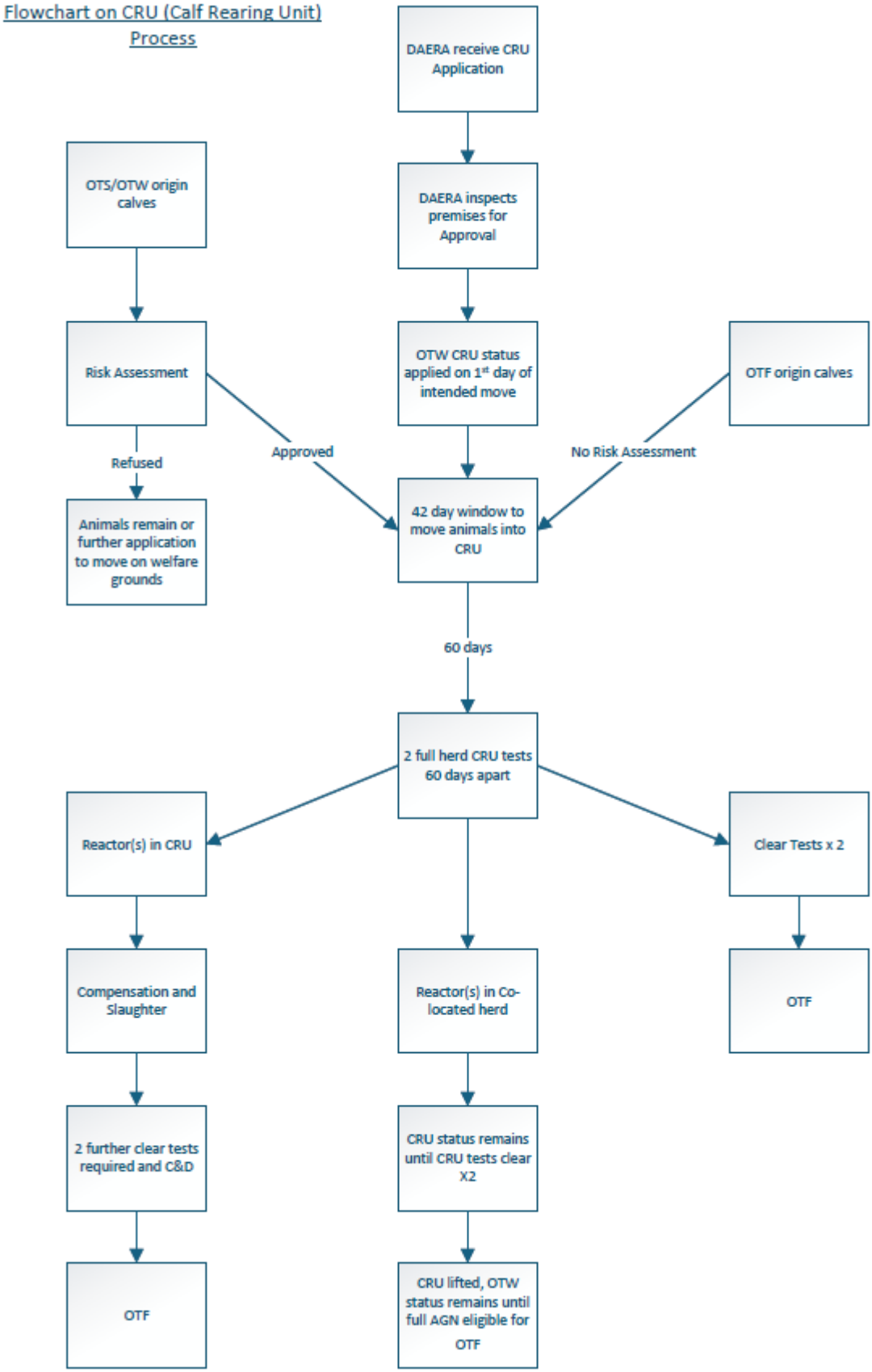
XI. Exit from CRU requirements

- All animals within the AGN with CRU status applied (e.g. all calves within the CRU and any co-located animals) must have completed 2 clear skin tests under severe interpretation, with the first test no earlier than 60 days (due date 90 days) from when the last calf enters the unit or the 42-day movement window into the CRU ends, whichever comes first.
- OTF can be restored once all testing has been completed and any necessary additional requirements in case of reactor/Lesion at slaughter disclosure.
- If the co-located cattle herd discloses TB reactors, the CRU status will remain in place until all calves within the CRU have completed the 2 full unit test requirements. At that point, if the CRU has completed 2 clear full unit tests under severe interpretation, the CRU status will be lifted and the full herd AGN will not regain OTF but remain under the relevant OTW restrictions until any additional actions to regain OTF have been completed. See Annex A.
- If the CRU discloses TB reactors at any of the 2 clearance tests, the CRU status and biosecurity restrictions will remain in place. Reactor animals will be valued and slaughtered and additional CRU and herd testing of the remaining animals will be required until the CRU has completed 2 clear tests under severe interpretation. In this scenario, full C&D of the CRU will also be required before OTF can be granted. The relevant CH* (Check Herd Test) will also be required once OTF status has been restored. See Annex A.

XII. Other

- Cattle Identification, Welfare, Cross Compliance and other disease control (e.g. Brucellosis, BVD) requirements will remain unchanged within a CRU.
- Usual identification requirements for cattle moving from the CRU to slaughter will apply.
- Conditions of operation will be kept under review. Any changes will be notified and communicated to allow sufficient time for implementation.

XIII. Annex A – overview flowchart of CRU process



XIV. Annex B – Template Record CRU Stock

Animal Group Number:					
Date first animal moved into CRU:					
Date of 42-day movement window or date last animal moved in, whichever comes first:					
Animal tag	**Breed**	**Sex**	**colour**	**Date in**	**Date of death (If applicable)**

For further information:

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