

Dublin, 1 July 2019

ICOS Response to the European Commission Consultation on the draft delegated regulation, supplementing Regulation (EU) 2016/429 of the European Parliament and of the Council as regards rules for surveillance, eradication and disease-free status for certain listed and emerging diseases

ICOS welcomes this opportunity to provide feedback on this draft delegated regulation and strongly calls for a revision of the proposal, specifically regarding the imposition of 30-day pre-movement testing for TB on all herds that are over 6 months tested (Annex IV, Part II, Chapter 1: Establishment free from infection with *Mycobacterium tuberculosis* complex).

This proposal is not acceptable, as it would impose a significant additional cost burden on farmers, negatively distort and hinder cattle sales and would not notably contribute to the eradication of the disease.

Imposing 30 days pre-movement testing on all herds that are over 6 months tested would mean significant additional costs for farmers, as well as increasing the time and administration burden placed on them. It would require an estimated additional €20 million a year to implement under the Irish TB Programme, which Irish farmers directly contribute to.

Moreover, it would majorly impede the sale of animals in Ireland, particularly trade in live exports and would lead to a significant distortion in the sale and marking of cattle, as it would force farmers to trade directly with factories in order to avoid additional costs. Throughput in Irish livestock marts would be severely impacted and in turn farmers would suffer from the lack of competition which is provided by the marts, driving down prices.

The proposal lacks sufficient scientific basis in terms of its contribution towards the eradication of the disease, particularly as it targets herds with the lowest TB risk. In light of this and its severe negative implications for farmers and livestock marts, the proposal must be removed from the delegated regulation.

About ICOS:

ICOS (the Irish Co-operative Organisation Society) represents over 130 co-operatives in Ireland – including the Irish dairy processing co-operatives and livestock marts – whose associated businesses have a combined turnover in the region of €14 billion, with some 150,000 individual members, employing 12,000 people in Ireland, and a further 24,000 people overseas.