TB PLAN REVIEW

- Proposal for Consultation

September 2025

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National Bovine TB Plan Governance Group (PGG)
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This paper is also available online **www.tbplanreview.co.n**z.

Disclaimer

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Foreword

Bovine tuberculosis (TB) is a risk to our farming industry, human and animal health and to New Zealand's economy.

We have made great progress in reducing the impact of TB but there is more to do to eradicate the disease, to protect our valuable dairy, beef and deer industries and to safeguard our rural communities.

We know eradication will not be possible unless we get rid of TB-infected possum populations so that they can no longer infect cattle and deer herds.

Critical to our success to date has been the TBfree programme, driven and funded by those directly affected – farmers and all New Zealanders.

A review of the plan that governs the TBfree programme is now underway.

In this review, we have looked hard at every aspect of the plan, to test whether changes may be needed so we can achieve our goal of biological eradication of TB from New Zealand by 2055. While that date may seem far off, the reality is it requires an ongoing concerted effort to eliminate the disease from herds and possums within the next 15 years – by 2040 – followed by a period of ongoing monitoring of possums and other wildlife in order to prove the disease is completely absent from New Zealand by 2055.

The sooner we eliminate TB in possums and herds, the sooner we can reduce the cost to farmers and New Zealanders – and that's something everyone wants.

We have developed tools and methods that have served us well and are continuing to work across the country. However, we see a need to intensify the focus of the TBfree programme on the remaining hot spots of highly-infected possum populations, while continuing work to reduce herd infections.

In this document, we discuss options for doing that at pace, and set out our recommended approach.

We are now seeking the views of all stakeholders – be it cattle and deer farmers, local communities, iwi/hapū, industry representatives, local authorities, or just an individual who has an interest in the management of TB in New Zealand.

The Plan Governance Group and I are interested in your views on how best to finish the job of eradicating TB.

Dr Helen Anderson

Independent Chair, Plan Governance Group

About this review

Control and eradication of TB in New Zealand is directed by a National Pest Management Plan under the Biosecurity Act 1993 (Biosecurity Act), implemented by the management agency TBfree NZ (OSPRI).

The cost is shared between farmers and Government. Beef, dairy and deer farmers across New Zealand pay 60 percent through levies while the Crown pays 40 percent, through the Ministry for Primary Industries (MPI).

As required by the Act, a review of the TB Plan is now underway.

Plan Governance Group

A Plan Governance Group (PGG) was established to undertake the review of the TB Plan and to develop a proposal for the Minister for Biosecurity.

The PGG has an independent Chair, Dr Helen Anderson, an experienced primary sector board director. Members of the PGG are the chief executives of DairyNZ (Campbell Parker), Beef+Lamb New Zealand (Alan Thomson), and Deer Industry NZ (Rhys Griffiths) as well as the Chief Veterinary Officer of the Ministry for Primary Industries (Mary van Andel). The PGG also includes observers from the Department of Conservation (Stephanie Rowe) and the management agency, TBfree NZ (OSPRI), (Sam McIvor and Simon Andrew).

Technical expertise and support

The PGG has been supported by a Review Advisory Group providing technical expertise. The independent chair is Stu Hutchings, a biosecurity specialist. Members are: Dairy NZ (Carol Barnao), Beef+Lamb New Zealand (Will Halliday), Deer Industry NZ (Emil Murphy), MPI (John Walsh), Department of Conservation (Ben Reddiex), OSPRI (Simon Andrew and Mark Neill).

The secretariat consists of Project Lead Jonathan Rudge and Review Co-ordinator Shannon Ross.

The PGG's review and recommendations have been informed by several independent technical, science, and financial reviews of the 2016 TB Plan and its progress over the last nine years. These are available on the website **www.tbplanreview.co.nz**.

The PGG will consider feedback before making recommendations to the Minister.

Your views matter

This is your chance to have your say on how New Zealand will finish the job of eradicating TB. This document gives you an overview of what is proposed and once you have read it, please take the opportunity to have your say.

Go to our website **www.tbplanreview.co.nz** or see the details at the end of this document.

Animal TB lesions

Why this is important for farmers and all New Zealanders

Bovine TB is a serious animal health problem and a threat to our farming industry. If left unchecked, it would spread and cause unacceptable animal welfare consequences, result in significant production losses, and increase risk to export markets. It can also infect humans, through unpasteurised milk or contact with infected animals or carcasses.

No farmer wants to see animals suffer, or to bear the financial costs and stress of lost production and limits on stock movement.

No New Zealander wants to see overseas markets for New Zealand products put at risk.

New Zealand has a world-leading collaboration between government and industry to tackle TB. This has paid off, with decades of work and investment bringing New Zealand close to eradicating bovine TB from farmed livestock, leaving 15 infected herds at 30 June 2025, out of around 75,000.

However, experience with the significant outbreak in Hawke's Bay in 2020 and further recent outbreaks makes it clear that if we don't eradicate TB from the possum population – the main carrier or 'vector' of the disease – we won't be able to maintain the current low numbers, or eradicate it from livestock, as re-infections will continue.

What is meant by TB freedom, elimination and eradication

In the context of the TB Plan:

- **'TB freedom'** means having confidence that there are no TB-infected farmed cattle or deer herds in New Zealand. For possums, disease freedom is defined as achieving at least 95% confidence, through a structured 'Proof of Freedom' process, that TB is no longer present in areas previously identified as likely to have infected possum populations (that is, vector risk areas).
- **'Eradication'** of TB is defined as having a very high level of confidence, based on modelling of data collected through programme activities over time, that TB is no longer present in any of the monitored species (livestock, possums, pigs and deer) species.
- **'Elimination'** is the act of removing infection from the target population, that is, the process rather than the end result.

Great progress is being made

Bovine TB has been in New Zealand for more than 150 years, probably introduced through infected cattle.

Control measures started in the mid-20th century. By 1970 all herds were undergoing regular TB testing or post-mortem inspection, with compulsory slaughter of test-positive cases and partial quarantine of infected herds.

The discovery that TB-infected possums were transmitting the disease to livestock led to government-funded possum control, targeted at areas with major TB problems. This resulted in a significant decline in livestock infections.

However, after government funding for possum control was gradually withdrawn, there was a resurgence of infections in the 1980s, peaking in 1994 with 1,694 infected herds.

Since then, farmers and government have together invested significantly in TB control, focused on three key areas: testing and slaughtering infected animals, controlling animal movement, and controlling infected possum populations.

That's paid off, with infections dropping to 15 (at 30 June 2025).

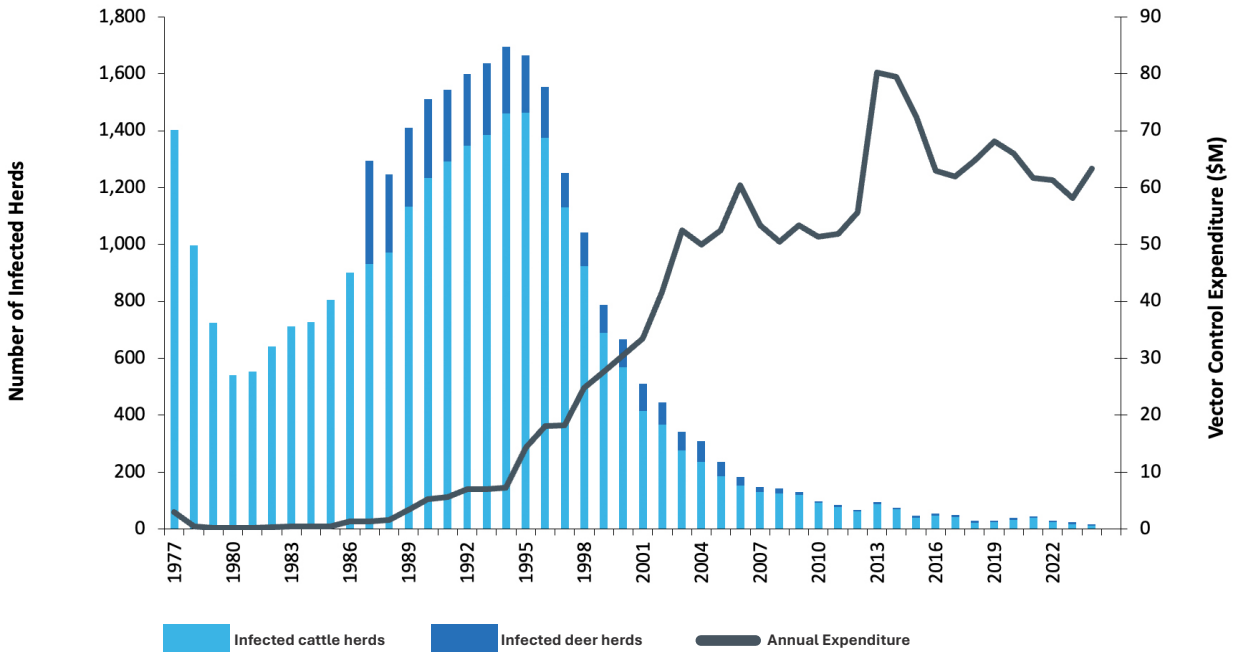

Figure 1: The number of infected cattle and deer herds and expenditure on managing TB from 1977 to 2025

Since 2016 the TB Plan has had an objective of eradicating bovine tuberculosis from New Zealand.

Eradicating the disease from possums is critical to achieving this objective as, while infection remains in possum populations, there will always be ongoing risk of infecting livestock on neighbouring farms.

There are still some areas with highly-infected possum populations around the country, known as vector risk areas, especially in the central North Island and Central Otago. These are shown in red on the maps below.

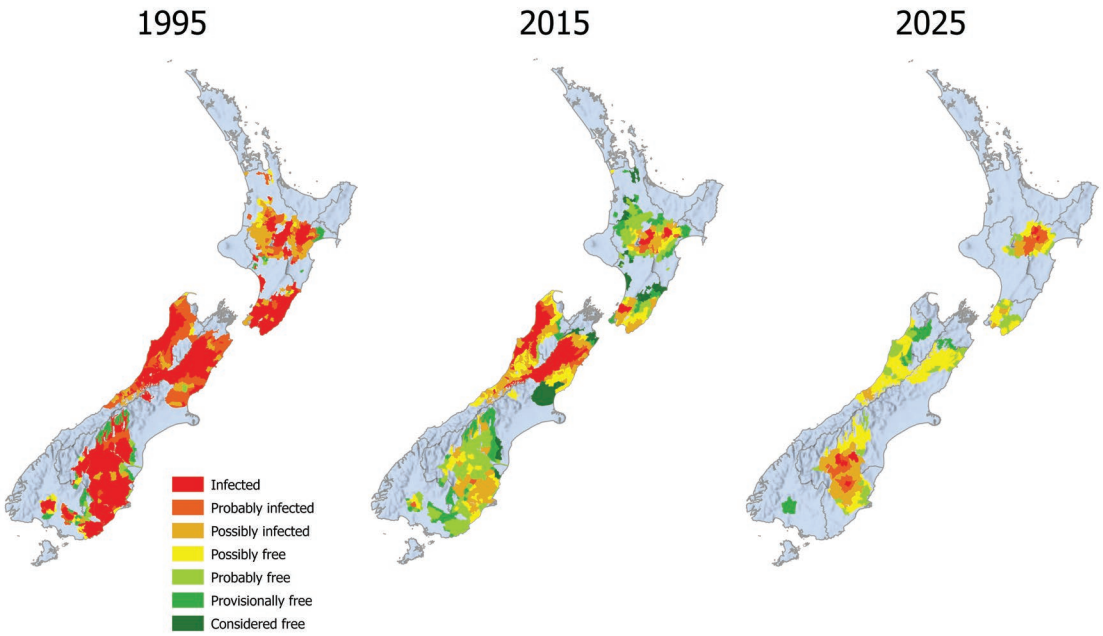

Figure 2: TB infection across New Zealand since the 1990s. Red indicates TB is present, dark green means a high probability that the area is free of TB, while grey means the area was considered to be free of TB.

While there has been great progress, the risk remains. For the review, modelling was undertaken to look at infection spread if there was no control from now (2025). In this situation, infected herd numbers may reach 170 by 2033 and there would be a steady increase in the area of land where there are infected possums.

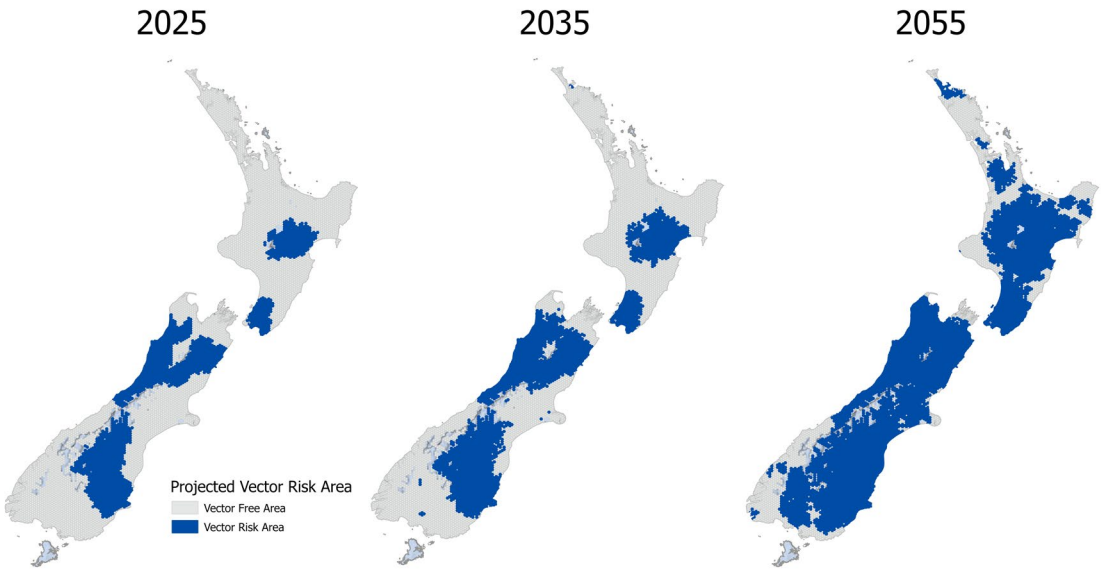

Figure 3: Projected infection spread if no control from now

Finishing the job

The PGG believes it is possible to improve the cost-effectiveness of the TBfree programme to control and eradicate TB, to deliver benefits sooner.

It recommends an intensified focus on eradicating the disease in the most infected possum populations while also sharpening monitoring and surveillance by adopting a more targeted, risk-based approach to herd testing.

The review concludes that the science and technology approach of the last TB plan remains sound and, despite some operational, financial and technical challenges over the past nine years, the programme is making good progress.

The programme is on target to deliver the 2040 objective of TB freedom in possums, albeit with additional, inflation-related, costs to that forecast in 2015. It will then be important to maintain surveillance of possums and other wildlife through until 2055 to ensure the disease is no longer present before declaring TB eradicated.

The review found there has been considerable investment over the last 25 years in research on alternatives to 1080 and other delivery mechanisms, yet aerial 1080 remains the only possum control tool available to deliver rapid, effective and efficient, broad scale control especially where the terrain or vegetation cover prevent reasonable access for workers on the ground.

Recommendations for consultation

There are three recommendations highlighted here for feedback.

- **Update the objective and milestones**

  The proposal is to clarify the objective and update the milestones in the TB Plan.

  The objective would be:

  'eradication of bovine TB from New Zealand by 2055'

  This removes the word 'biological' from the current objective but has the same end result of being confident that the disease is no longer present in any monitored species.

  The PGG proposes keeping the current milestone of achieving TB freedom in possums by 2040 and aligning the milestone for livestock to the same date:

  'achieving TB freedom in both livestock and possums by 2040'

  This is a change from the current milestone of livestock freedom in 2026. While very close to that target, with around 0.01 percent of herds infected, it is not practically possible to achieve zero herd infections until the disease is no longer present in possums. While reservoirs of disease remain in the possum population, there will continue to be outbreaks of infection in livestock.

  A change is proposed to align the definition of achieving TB freedom in herds with the definition of TB freedom in possums. Surveillance data from TB testing on-farm and at slaughter will be used to determine the level of confidence that TB is no longer present in farmed NZ deer and cattle. The target will be at least 95% confidence that TB would be detected if present in more than one in a million cattle or deer.

- **Prioritise eliminating TB from possums**

  The proposed approach intensifies the focus on eliminating TB in the remaining hot spots of highly-infected possum populations as soon as possible, using large 'landscape-scale' operations. In this document 'landscape-scale' refers to the entire area of risk, which may be a large geographic area, without leaving uncontrolled or inadequately controlled gaps where infection could persist in local possum populations.

  At the same time, surveillance would continue but with a more risk-based approach to testing (discussed further on page 12).

  The programme would use aerial 1080 as the optimal and proven tool for possum control in difficult-to-access areas such as steep and remote back-country, alongside some ground control (traps and toxins).

  The cooperative relationships already in place with landowners including iwi and hapū would continue and could include new initiatives and research and development of new tools. For example, working with iwi and hapū and other landowners to build their capability and tools to achieve land management goals and sustain the gain from funded possum control operations.

  This approach is modelled to clear infection from target areas and have no infected herds before 2040, at an estimated cost of $721 million.

- **Review long-term funding**

  Eliminating TB is going to cost more than forecast back in 2015. That forecast did not account for inflation and the efficiency gains since then have not been enough to offset this.

  Funding commitments from farmer levy organisations and government, of $60 million a year, will cover the costs for the next five years, to 2031.

  The level of funding required was anticipated to reduce from 2031, as targeted eradication cleared more regional areas. While the eradication programme is making good progress, based on current information, there is expected to be a funding shortfall from 2031 to 2055. Current estimates are that around $120 million additional funding will be required over that future 24-year period to achieve the 2040 milestones and, ultimately, the 2055 eradication objective. This estimate includes the impact of inflation.

  The intent is to review long-term funding within five years. It's too soon to say what the outcome of that review will be.

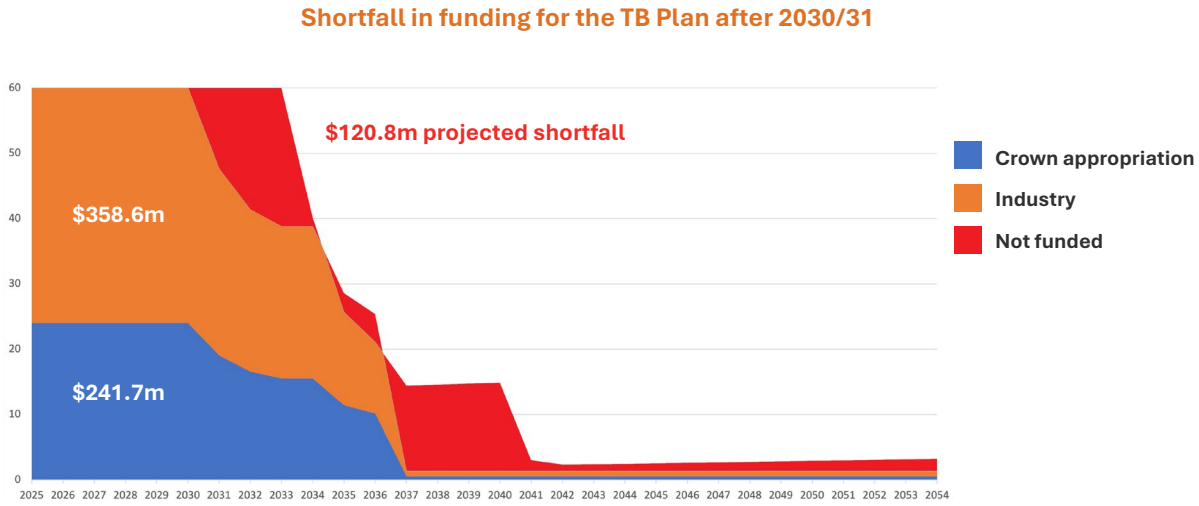

Figure 4. Projected shortfall in funding 2031-2055

Options considered

The full range of options for the future of the TB Plan were considered.

The review started by looking at alternatives to eradication. It considered the options of 'doing nothing' (basically ending the programme) or 'containment' (shrinking back to protecting herds only). These were not considered to be tenable, because doing nothing would ultimately result in further outbreaks and out-of-control herd infection, while containment would require some form of control forever and would ultimately be more expensive (and risky) than eradication.

The PGG decided New Zealand needs to continue to aim for eradication. It then looked at three options:

- Prioritising eliminating the disease from possums, making optimal use of aerial 1080 and more targeted testing.
- An alternative mix of possum control tools, with less aerial 1080 and more ground control, and more targeted testing.
- Continuing the current approach (the status quo) which balances possum control with herd protection.

For each option, the timeframes for reaching TB freedom in possums and herds and the costs involved were modelled. The results indicate that the proposed approach is the most cost effective and technically likely to achieve TB freedom in livestock and possums by 2040.

Figure 5. Summary of modelling of options

Option	Key features	Time to TB freedom in possums	Time to TB freedom in herds	Cost to become TB free
Proposed approach	• Prioritise eliminating disease from possums in hot spots • Optimal use of aerial 1080 on difficult-to-reach, steep and remote land • Targeted TB testing on farm	12 years (2036)	13 years (2037)	$721m
Alternative	• Prioritise eliminating disease from possums in hot spots • More use of ground-based control tools; noting that this is not proven to be effective in difficult-to-reach areas • Targeted TB testing on farm	14 years (2038)	16 years (2040)	$870m
Status quo	• Focus on herd protection balanced with vector control • TB testing maximised for early detection and case management	18 years (2042)	22 years (2046)	$1,005m

- **Proposed approach**

  The proposed approach focuses on delivering the national objective of eradication of TB from New Zealand as soon as technically possible by prioritising activities that will remove the disease from the possum population alongside ongoing management of infected herds.

  A fundamental element of this approach is the prioritisation of landscape-scale vector control to target the infected possum populations that present the greatest risk. This requires the use of aerial 1080 as the optimal and only proven tool for vector control in difficult-to-reach back country areas.

- **Alternative option**

  This option represents an alternative approach to eradicating infection in possums by relying more heavily on ground control methods including trapping and the use of a range of toxins.

  This option is likely to see continued reservoirs of infected possums in steep rugged terrain that pest management contractors cannot safely access on foot to lay traps or toxins. This means an ongoing risk of re-infection and adds to the risk that the overall objective of eliminating TB would not be achieved.

  The modelling indicates that this option would take until 2038 to clear infection from possums, and even then, may not be fully successful. This option is estimated to cost $870 million.

- **Status Quo option**

  The Status Quo focuses on balancing the protection of herds from infection with eradicating the disease from possums. This means prioritising possum control activity in buffer areas around places where known infected possum populations interact with livestock.

  Prioritising buffer areas reduces the amount of possum control that can be undertaken at landscape scale in the core areas. Possum control in buffer areas depends on more expensive ground control methods, reducing the budget available.

  Modelling forecasts that under the status quo option it would take 18 years (2042) to clear infection from the possum population and 22 years (2046) to have no infected herds. Farms would be subject to additional testing requirements until 2041.

  It is likely the programme would need to continue beyond the current 2055 timeframe to provide confidence the disease is absent from possums and other wildlife and would cost $300 million more.

The costs and the benefits

The proposed approach has a significantly better cost-benefit ratio than the other options, that is, for every $1 spent using this option, the benefit value is nearly $9.60. That's because using aerial 1080 is the most cost-effective pest control approach and allows New Zealand to get to eradication faster, and therefore at less cost.

	Proposed Approach	Alternative option	Status Quo
BENEFITS (NPV)			
Total – the total benefits expected over time represented in current day value	$2,485 million	$2,477 million	$2,486 million
- Financial/Economic	$2,288 million	$2,285 million	$2,280 million
- Health/Social	$34 million	$34 million	$34 million
- Environment	$163 million	$158 million	$173 million
- Indirect costs	-$17 million	-$21 million	-$26 million
COSTS			
- Direct costs	$721 million	$870 million	$1,004 million
- Direct costs (NPV) – the total direct costs expected over time represented in current day value	$259 million	$297 million	$323 million
Benefit/Cost Ratio	9.58:1	8.35:1	7.69:1

In the table above, 'Costs' are split into two categories. Direct costs are possum control, testing, disease management, operational, research and corporate support. Indirect costs are costs to farmers, including mustering for testing and herd management carcass value losses and this is treated as a negative benefit for the purposes of a benefit cost analysis.

Cost estimates are based on projections of current costs and include the impact of expected reductions to both TB prevalence and vector risk area size, as well as efficiency savings.

The modelling used by the review to estimate the costs of the different options for eradication is based on the Vector Operations Cost Model (VCOM) developed by OSPRI.

The assumptions made in the modelling have been reviewed by Graham Mackereth, an independent expert epidemiologist with extensive knowledge and experience of New Zealand's TBfree programme. The financial assumptions have been reviewed by PricewaterhouseCoopers.

OSPRI's operational changes

The review has to focus on the regulations that establish the TB Plan. There is a close connection between the review and OSPRI's implementation of the plan at an operational level through the TBfree programme.

OSPRI already has planned improvements to its operations that will improve the likelihood of achieving the 2040 milestones and eradication by 2055. The review was able to consider OSPRI's proposed changes.

These are described below, and you are welcome to provide feedback on these.

- **More targeted testing**

  OSPRI tests cattle and deer herds all across New Zealand for TB. In higher-risk areas, on-farm testing is more frequent.

  In lower-risk areas, called surveillance areas, OSPRI keeps watch for the disease through a combination of on-farm TB testing and meat inspection of all livestock slaughtered for human consumption.

  OSPRI is now moving to more targeted, criteria-based on-farm testing in surveillance areas, from the existing routine testing approach. This targeted testing has started in some areas, and will be rolled out nationwide over coming years.

  For farmers this means TB testing in surveillance areas will become more targeted to herds at risk, using assessment criteria that include the presence of animals from previously infected herds, volume of animal movements from high-risk areas, herd size, production type, and NAIT compliance.

  As the programme moves closer to clearing infection in possums across a significant geographic area of the country, it may become feasible to depopulate groups or entire herds where the risk of residual infection within herds is too high. The current approach to compensation will continue.

  The programme may also place long-term restrictions on a premises or herd to manage the risk of persistent infection, and transmission from herds that are not depopulated.

  Savings from less testing allows more funds to be directed at possum control.

- **Herd Status classification**

  The current herd status system has served the TB programme well. However, with the move to more targeted testing, the herd status classification system is no longer fit for purpose.

  There are likely to be some herds that will no longer receive regular on-farm TB testing, rather relying purely on slaughter surveillance.

  OSPRI is exploring ways to simplify the yearly 'C1 – C10' index system to a simpler classification with only four levels of status. It could look like:

  - *C: Clear*
  - *S: Suspended (pending further testing)*
  - *I: Infected – Case managed herds*
  - *P: Provisionally clear (1 - ~3+ years (equivalence to C1)) – Case managed herds*

  Clear (C) status would be applied to both breeding and drystock herds while targeted testing would determine which herds are required to test, based on risk factors including the herd type.

  This system is much more straightforward for farmers, allowing them to easily understand their current status and identify which herds are under investigation or case management. There are no index numbers to remember or keep updated.

Technical clarifications

There are some technical amendments proposed to clarify the plan which need to be made to the 'Order in Council' that applies to the TB programme legislation. The table below shows the changes proposed.

Clause (and current wording)	Proposed change (with proposed new wording)	Rationale/why we propose this change	Impact
5A - Principal measures to implement plan Current wording: (c) the management of vector populations in tuberculosis vector risk areas, in buffer control zones associated with those areas and in response to incursions where they might occur:	Add 'response to incursions wherever they might occur' Proposed wording: (c) the management of possum populations in tuberculosis vector risk areas, in buffer control zones associated with those areas and in response to incursions where they might occur:	The current reference restricts activities to tuberculosis vector risk areas and buffers associated with these areas. TBfree should have explicit ability in the plan to control and survey VFAs where areas are considered to be free of possum populations with TB.	There is no immediate impact on farmers. This change is important to protect farmers in areas without TB infected wildlife, if the disease is detected unexpectedly.
12 D – Retention of declarations Current wording: (1) The owner of an animal to which the declaration required under clause 12B refers must retain a copy of the declaration that he or she completed for 12 months from the date of signing. (2) On completion of the movement, the person to whom the animal is delivered must retain the accompanying declaration, or a copy of the declaration, for— (a) 12 months from the date of receipt of the animal; or (b) the period, if greater than 12 months, during which the person is in charge of the animal	Amend from six months to 12 months to align with ASD requirements Proposed wording: The owner of an animal to which the declaration required under clause 12B refers must retain a copy of the declaration that he or she completed for 12 months from the date of signing. (2) On completion of the movement, the person to whom the animal is delivered must retain the accompanying declaration, or a copy of the declaration, for— (a) 12 months from the date of receipt of the animal; or (b) the period, if greater than 12 months, during which the person is in charge of the animal.	It is important to align the Order and the Animal Status Declarations that are enabled by it.	Farmers will need to be aware of this because this is a legal declaration.

Clause (and current wording)	Proposed change (with proposed new wording)	Rationale/why we propose this change	Impact
15 - Obligations of laboratories to provide results. Current wording: If a tissue specimen is sent to a laboratory in accordance with clause 14, 14A, or 14B, the laboratory must provide TBfree New Zealand with the results of the investigation, the origin of the animal from which the sample was collected, the person responsible for the animal (capture of or management of) and the name of the person who collected the sample.	Add requirement to include sufficient information to identify the origin of the sample. Proposed wording: (1) If a tissue specimen is sent to a laboratory in accordance with clause 14, 14A, or 14B, the laboratory must provide TBfree New Zealand with the results of the investigation, the origin of the animal from which the sample was collected, the person responsible for the animal (capture of or management of) and the name of the person who collected the sample.	Currently all that is required by the plan is the name of the person who collected the sample. TBfree needs to be able to link a sample to a herd/owner, wild animals submitter and the origin location of the animal.	No direct impact on farmers
17A – Release of pigs into wild state Current wording: (1) No person may release a pig into a wild state. (2) This clause does not apply if the pig— **(a)** is— (i) a wild animal, as defined in section 2(1) of the Wild Animal Control Act 1977; and (ii) released on land that is administered under any of the Acts listed in Schedule 1 of the Conservation Act 1987; or **(b)** is released by TBfree New Zealand for research purposes.	Remove 17A (2) as unclear and unnecessary. This is covered under the Wild Animal Control Act 1977. Proposed wording: (1) No person may release a pig into a wild state. (2) This clause does not apply if the pig is released by TBfree New Zealand for research purposes.	Implies wild pigs could be released on to land administered under other acts. Keep 17A (3) allowing TBfree to release pigs for research purposes.	No direct impact on farmers

HAVE YOUR SAY

Find out more about the review and TB Plan proposal by:

- reading this document
- going to a public meeting in your region
- visiting the website **www.tbplanreview.co.nz**
- joining an online meeting.

Give us your feedback through email, post or by completing our online form.

You can email, post or complete your submission online. Submissions need to be submitted to the National Bovine TB Plan Review Secretariat by Sunday 12 October 2025.

Email: **submissions@tbplanreview.co.nz**

Website: use the form on the website **www.tbplanreview.co.nz**

Post: National Bovine TB Plan Review Secretariat
PO Box 3412
Wellington 6140

Once consultation closes, the Plan Review Secretariat will analyse the submissions and respond to all the points raised by submitters. A summary of submissions will be available on the plan review website once complete.

Submissions will be used to inform the final proposal to the Minister for Biosecurity.

As part of this consultation, we will collect your name, submission, and, optionally, your contact details. Your name and submission may become publicly available. Submissions may also be subject to requests under the Official Information Act 1982 (OIA), which requires information to be released unless there are sufficient grounds for withholding it, as set out in sections 6 and 9 of the OIA. If you think there are grounds to withhold specific information from publication, please make this clear in your submission or contact us directly - reasons may include that the publication would disclose commercially sensitive or personal information. We note that any decision to withhold information under the OIA is reviewable by the Ombudsman, who may direct us to release it.

Providing contact details is optional, but it will help us follow up with you if we have questions about your submission. Contact details will not be published if your submission is made publicly available.

TBfree, as host of the TB Plan Review Secretariat, retains responsibility for all personal information collected during this process, and any such information will be handled in accordance with the Privacy Act 2020. The Privacy Statement for OSPRI, TBfree's parent company, can be found here. Submission responses using the online form will be processed by a trusted third-party service provider, SurveyMonkey, on our behalf. Please refer to SurveyMonkey's Privacy Notice for details on how they treat personal information.

Questions to guide your feedback

These are the same questions as in the online form on the website www.tbplanreview.co.nz.

You do not have to answer every question, and you may add additional comments.

Thank you.

1. **Do you support the aim of eradicating bovine TB from herds and possums in New Zealand?**
2. **Do you support the proposed approach of prioritising the elimination of the disease from the possum population?**
3. **Do you support the proposed milestone of achieving freedom in both possums and livestock by 2040?**
4. **Do you support the proposed approach to defining livestock freedom?**
5. **Do you support the proposed approach to confirming funding set out in the document, that is, a review within five years?**
6. **Do you have any comment on the proposed technical clarification to Clause 5A - Principal measures to implement plan?**
7. **Do you have any comment on the proposed technical clarification to Clause 12 D – Retention of declarations?**
8. **Do you have any comment on the proposed technical clarification to Clause 15 – Obligation of laboratories to provide results?**
9. **Do you have any comment on the proposed technical clarification to Clause 17A – Release of pigs into wild state?**
10. **Do you have any comment on the proposed operational changes moving to more targeted, criteria-based on-farm testing?**
11. **Do you have any comment on the proposed operational changes to Herd Status classification?**
12. **Is there anything else you think we should consider?**