

Bovine TB and Badgers Consultation
Defra
1a Page Street
London SW1 4PQ

By email to: bTB.consultation@defra.gsi.gov.uk

Dear Sir or Madam

Thank you for providing Wildlife and Countryside Link with the opportunity to comment on the consultation paper on "Controlling the Spread of Bovine Tuberculosis in Cattle in High Incidence Areas in England: Badger Culling".

Wildlife and Countryside Link (Link) brings together voluntary organisations concerned with the conservation, enjoyment and protection of wildlife, the countryside and the marine environment. Together our members have the support of over 8 million people in the UK.

This response to the consultation is supported by the following Link members:

- Badger Trust
- Buglife – the Invertebrate Conservation Trust
- Butterfly Conservation
- Environmental Investigation Agency
- Hawk and Owl Trust
- International Fund for Animal Welfare
- Royal Society for the Prevention of Cruelty to Animals
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- The Wildfowl & Wetlands Trust
- Woodland Trust
- World Society for the Protection of Animals

Yours sincerely



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"Bringing voluntary organisations in the UK together to protect and enhance wildlife and landscape, and to further the quiet enjoyment and appreciation of the countryside"

Chair: Hilary Allison, Director: Alexia Wellbelove

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Wildlife and Countryside Link response to Defra consultation on Controlling the Spread of Bovine Tuberculosis in Cattle in High Incidence Areas in England: Badger Culling

1. The Principle (consultation question 1)

Link believes that any bovine TB policy needs to be founded upon sound science. However, Link is concerned that Defra has not applied this principle for the purpose of this consultation, as demonstrated by the correspondence between the Independent Scientific Group (ISG) and Defra¹.

The ISG states that the consultation document is “inaccurate in important respects”, contains claims for which there are “no scientific data”, which are “without foundation” and which are “at variance with the scientific findings”². This strongly suggests that the consultation document is not based on sound science. In addition, the independent advice of the Chief Scientific Advisor’s Science Advisory Council (SAC) appears not to have been taken into account by Defra. For example, the SAC has advised that cattle-to-cattle transmission is the dominant transmission factor regarding bovine TB (bTB) in Great Britain³ and that culling badgers is unlikely to be an effective control measure unless and until further cattle based measures have been implemented successfully⁴.

Link does not dispute that the scientific evidence shows that badgers are part of the problem, but we agree with the SAC that the available scientific evidence demonstrates that the culling of badgers might only be effective once cattle based measures have been successfully implemented. Even then, the scientific evidence clearly shows that most culling options actually make the matter worse. Defra’s consultation contains no sound strategies for overcoming this problem.

Killing badgers in a systematic and prolonged programme, extended over very large areas of country might have a positive, albeit relatively small, impact on cattle TB rates. However, Link believes that this is not a practical option for the control of TB. Additionally, at the outset of the Randomised Badger Culling Trial (RBCT) one of the elements of the sustainability of any control, supported by Ministers, was that the widespread elimination of badgers from large tracts of countryside would not be politically or socially acceptable⁵.

We believe that the consultation should have taken a more holistic approach to the TB problem and proposed a number of options for the public and other stakeholders to respond to. For example, disease modelling work by the ISG has indicated that relatively modest improvements, either in TB test performance or TB testing frequency, would be sufficient to bring bTB under control⁶. However, there are no proposals in the consultation document to investigate the policy implications of such an approach. In Northern Ireland, the implementation of a stricter testing regime alone has resulted in a 40% reduction of bTB in just one year⁷. Although direct comparisons to this case

¹ See <http://www.defra.gov.uk/animalh/tb/isg/index.htm>

² Open letter from Professor Bourne to stakeholders. 20 January 2006

³ See [http://www.defra.gov.uk/science/documents/papers/2005/SAC-TB%20\(05\)%204%20report%20FINAL.pdf](http://www.defra.gov.uk/science/documents/papers/2005/SAC-TB%20(05)%204%20report%20FINAL.pdf)

⁴ See [http://www.defra.gov.uk/science/documents/papers/2005/SAC-TB\(05\)5%20Supplementary%20Report.pdf](http://www.defra.gov.uk/science/documents/papers/2005/SAC-TB(05)5%20Supplementary%20Report.pdf)

⁵ The Veterinary Record (2000) 146,207-210.

⁶ See <http://www.pnas.org/cgi/content/full/102/49/17588>

⁷ See paragraph 4.28 <http://www.defra.gov.uk/animalh/tb/pdf/wilesmore141105.pdf>

cannot be made, Link believes that the TB testing regime should be enhanced and the results carefully monitored under the supervision of the ISG.

The SAC also recommends the introduction of “potentially effective precautionary control measures which involve relatively low costs and are not controversial”⁸. This includes, but is not limited to, advice it has received from the ISG and others about minimising badger access to cattle housing, cattle feed and water troughs. Link is disappointed that Defra’s consultation does not propose such measures as an alternative to badger culling.

Link’s concerns about the scientific evidence base are particularly pertinent given Professor John Bourne’s oral evidence to the Environment, Food and Rural Affairs (EFRA) Committee, where he stated that “...the consultation document is imbalanced, in the sense that two of the options from the scientific perspective are simply not tenable”⁹. In light of such evidence from the ISG it is therefore Link’s opinion that the evidence presented in the consultation document is not sufficient to support a policy to cull badgers.

Link therefore believes that the available scientific evidence does not demonstrate sufficient evidence to support a cull of badgers and clearly shows that most badger culling options actually make the matter worse. In light of these circumstances Link does not support any badger culling policy as proposed in the consultation document.

2. Considering the Options for a Badger Culling Policy (consultation questions 2 – 9)

Link supports the position of the ISG, reiterated by its Chairman Professor John Bourne during his evidence to the EFRA Committee⁹ that “an informed cost-benefit analysis is necessary”. Link believes that before proceeding to full consultation, an updated cost benefit analysis of badger culling, taking into account the initial results of the proactive culling part of the RBCT, should have been completed and included within the Defra consultation document. The assumptions made in the Partial Regulatory Impact Assessment (RIA) therefore require updating before further comment or decisions can be made.

Link believes that the assumptions in the RIA - that about half of all confirmed TB incidents arise from badger-cattle transmission and that that these can be reduced in proportion to the reduction in the badger population - are unsound. The ISG has also said that the reference in the consultation document to a culling efficiency of 20-60% during the trial is misleading¹⁰. This provides further evidence that the use of the science has not been applied soundly in this consultation. In addition, given that an initial cost benefit analysis of badger culling options has been undertaken by Defra, we believe that a similar comparative cost benefit analysis of other measures should be taken including:

- the implementation of biosecurity measures to minimise the risk of transmission from badgers to cattle;
- enhancements of the TB testing regime; and
- the increased use of the gamma interferon TB test.

⁸ See paragraphs 15 & 23, [http://www.defra.gov.uk/science/documents/papers/2005/SAC-TB%20\(05\)%204%20report%20FINAL.pdf](http://www.defra.gov.uk/science/documents/papers/2005/SAC-TB%20(05)%204%20report%20FINAL.pdf)

⁹ Uncorrected Transcript of oral evidence (HC 905-i) to EFRA Committee

¹⁰ Pers com. Professor Bourne to RSPCA.

It was also noted by John Bourne in his evidence to the EFRA Committee⁹ that two of the options proposed by Defra were “not tenable” or supported by science. These were specifically the localised culling option, involving licensing farmers individually, or targeted culling, where farmers would work together as a cooperative and cull badgers from relatively small areas. He also questioned the reference in the consultation document specifically to 100 km² for the size of a culling area, when it has been shown that in 100 km² there will be approximately a zero impact on bTB incidence. Given the scale of the operation that would be required in order for any cull to have some positive effect (which is estimated to be in the order of 300km²), Link believes that a risk assessment of the proposed badger culling strategies should be prepared and published, together with a study of the feasibility of implementation which should include a robust assessment of the economic viability of any cull.

Link has a number of concerns with the requirement to remove badgers from a 300km² area through a sustained effort over a long period of time. Link believes that this is not a practical option for the control of bTB. The ISG has said that there are likely to be serious implementation difficulties with such an approach, particularly if landowners do not consent to a cull on their land. In addition, culling at this scale has not been trialled. The ISG only said that in principle culling would have to be on a wide spatial scale. Moving to wide scale eradication brings with it a much wider range of political, economic and logistical problems, and also legal issues in terms of land-owner compliance. Widespread culling will also have a significant impact on the badger population, turning the badger from a widespread species into a scarce one. Link is concerned that there may also be unanticipated impacts on the woodland ecosystem and wider landscape. The badger is a large mammal and there will clearly be implications of removing it on this scale. For the consultation to suggest that these impacts will simply be monitored is not a sufficient scientific basis on which to make such a significant decision. We therefore encourage Defra to commission further research looking at the effects of increased biosecurity measures before any culling strategy is implemented.

Link is also concerned that the licensing method proposed by Defra fails to state how Defra will monitor whether the licences for culling badgers are fully implemented and whether the licence conditions are adhered to.

3. Methods of Culling (consultation questions 10 – 20)

Whilst we note that “conservation considerations do not, as such, prohibit culling badgers but must be a key consideration when developing a badger culling policy”¹¹, any control of badgers will need to comply with national and international legal obligations on both animal welfare and species conservation. Link is concerned that Defra has proceeded with a consultation on culling strategies without providing information on key aspects including: the proposed number and proportion of England’s badgers that would be culled; how Defra will ensure that the conservation status of the badger is fully protected; and the wider implications that badger culling strategies will have for nature conservation. Link would expect to see further information on these points made available before any final decision is made.

Link does not support any badger culling option, since each of the proposed methods has inherent welfare problems that are not yet solved. We believe that further evidence is required as to how Defra will ensure that animal welfare standards are maintained under the various culling strategies and how these animal welfare

¹¹ Paragraph 53, page 28 of the consultation document

standards will be enforced by Defra, particularly if the culling operations are licensed out to farmers or other contractors.

Link has a number of concerns over the proposed methods of culling, particularly with regard to why Defra is proposing gassing or the use of snares, when much of the information required to inform an assessment of such methods is still to be obtained. Link is concerned that Defra is proposing badger killing methods that are either currently undeveloped, or appear likely to cause more suffering than previous methods. Coupled with the fact that the options are based on farmers using such methods, Link believes that culling will not meet the highest standards of humaneness.

4. Monitoring (consultation question 21)

It is essential that the relative benefits and costs of the control measures on cattle and on badgers can be separated for the purpose of analysis. Link requests that Defra provide further information as to how the Government will analyse the benefits of the implementation of these measures and distinguish between these if both policies are implemented simultaneously. Link recommends a staged implementation of TB control measures, focussing first on cattle to cattle measures, followed by measures to minimise badger-to-cattle transmission. Badger control measures should only be considered as a later option if it can be shown that other measures have been implemented, enforced and shown ultimately to be unsuccessful. This is particularly important as Link is yet to see evidence as to how pre-movement testing of cattle will be monitored and consistently enforced by Defra.

5. Summary

Link is very disappointed that the breadth of the consultation has been focussed on whether there should be a badger cull, without providing other strategic options or taking a more holistic approach to the control of bTB.

Link believes that the consultation has ignored the initial results of the RBCT, other scientific evidence and independent scientific opinion. Link believes that this raises serious questions over Defra's ability to use sound science when planning policy developments.

Link remains convinced, as does the SAC-TB sub-group, that cattle-to-cattle transmission remains the most significant route of infection for bTB in cattle. For this reason, Link believes that the Government should focus first on proposed measures to address cattle-to-cattle transmission, only considering badger control measures as an option once the cattle-to-cattle and biosecurity measures have been successfully implemented and their effectiveness assessed. Link urges the Government to continue to fund and pursue scientific research into the development of vaccines to combat bTB, which may represent a long-term measure in reducing and controlling bTB in Britain.

As a result Link reiterates that in the current circumstances we do not support any moves to introduce any form of badger culling as a mechanism to control the spread of bTB.

Wildlife and Countryside Link
3 March 2006