



Wildlife and Countryside Link Bovine TB Working Group: Comments on the national bTB strategy recommendations from the 'Badgers and Other Wildlife working group'.

24th February 2026

This response is on behalf of Wildlife and Countryside Link (Link), a coalition bringing together 94 organisations to campaign for the natural world.

This response is supported by Badger Trust, Born Free Foundation, Humane World for Animals, and the RSPCA.

Wildlife and Countryside Link is pleased to provide comments on the recommendations from the 'Badgers and Other Wildlife' working group, as part of the national bovine TB strategy refresh. This response is intended to complement and amplify comments shared by individual Wildlife and Countryside Link members.

To ensure that environmental input and expertise is adequately considered and captured within the development of the new strategy, further to these comments, we suggest that eNGOs should be permitted advance sight of and/or the opportunity to provide further written comment on the strategy document itself once a full draft is available. A cattle-focused approach will be required to effectively manage bovine TB, and therefore whilst we provide comments here on the recommendations from the 'Badgers and Other Wildlife' working group, we would welcome the opportunity to review the recommendations emerging from other relevant working groups and the strategy itself in the round.

We would be pleased to discuss any of the points raised in this response further.

Badger vaccination

The refreshed national strategy should include badger vaccination as a means to reduce bovine TB in badgers. It should not be promoted or used as a tool to reduce bovine TB in cattle.

Scientific evidence shows that the vast majority of bovine TB transmission occurs from cattle to cattle, rather than from badgers to cattle. Evidence demonstrates that badger vaccination has been shown to reduce bTB in badgers but there is currently no scientific evidence to suggest badger vaccination will reduce bTB in cattle. A cattle-focused approach is therefore required to manage bovine TB.



Badger vaccination can be used as a non-lethal, humane approach to reduce bTB in badgers. However, this should not be promoted or used as a tool to reduce bTB in cattle, for as stated, badgers are not a significant factor in disease transmission.

We are therefore supportive of recommendations that the national strategy should drive wider rollout of badger vaccination programmes **provided this is for the purpose of tackling bTB in badgers, to improve badger welfare and the health of the badger population.** We are also supportive of recommendations to improve the accessibility and availability of training in badger vaccination for farmers, to ensure that the health and welfare of badgers is protected.

Wildlife and Countryside Link supports the view of the RSPCA that Recommendation 5 should be reworded. Improved communication and awareness around badger vaccination is needed, to clarify that badger vaccination has a role for controlling bTB *in badgers* and that this is *not* a tool for controlling bTB within cattle.

Badger population surveillance

The disruption of live badgers must be minimised. Testing of Badgers Found Dead, and during initial vaccination assessments, should be prioritised.

Wildlife and Countryside Link supports the position of the RSPCA that bTB testing of live badgers should only be used when deemed absolutely necessary, given the negative welfare implications associated with trapping, handling and anaesthesia. Recommendation 3 should be updated to clarify that post-mortems of roadkill and Badger Found Dead testing should take priority.

Any badgers culled under the Cumbria licence in 2026¹ **must** be tested for bTB, in order to determine disease prevalence, and to inform any future badger vaccination efforts to reduce bTB within badgers in Cumbria in order to improve the health of the badger population.

Non-governmental stakeholder input to decision making

Non-governmental stakeholders must have greater input to decision-making going forward. This must include the permanent inclusion of additional independent environmental, ecological, animal welfare and disease control expertise to the TB Partnership.

Wildlife and Countryside Link is supportive of Recommendation 6. The Godfray Review 2025 clearly identified that the problem of bovine TB must be 'co-owned' in order for policy to be

¹ Wildlife and Countryside Link opposes the badger cull policy. Government should withdraw the Cumbria 2026 license immediately.



successfully developed and implemented. This co-ownership must include a larger role for NGOs and independent experts in terms of input to decision making and policy development, in particular eNGOs with environmental, wildlife and welfare expertise. Additional independent wildlife, animal health and welfare expertise should be added to the Partnership to ensure balanced representation on a permanent basis.

The role of lethal badger control

There must be no role for lethal badger control in the national bovine TB strategy, or in the management of bovine TB going forward. There is no robust scientific evidence to justify further culling of a protected species to manage a cattle-based disease.

Wildlife and Countryside Link strongly opposes Recommendation 7. After decades of badger culling and 13 years of intensive badger culling, analyses of the impacts have resulted in no robust scientific evidence to demonstrate that culling badgers has reduced the incidence of bovine TB in cattle. Indeed, the Godfray Review 2025 asserts that it has not been possible to prove any measurable reduction in bTB in cattle due to badger culling. Furthermore, research shows that the vast majority of bTB transmission occurs between cattle to cattle, and therefore that badger-focused interventions will not reduce bTB in cattle herds.

As per the international consensus principles for ethical wildlife control, lethal intervention should only be used as the last option, in exceptional circumstances, and only with clear, time-bound objectives as part of a systematic plan that causes the least animal welfare harms to the least number of animals.

The new national strategy must take a strong cattle-focused approach, in line with the best available science, and with Government's manifesto commitment to end the badger cull. This should include mandatory movement controls, stricter industry biosecurity measures, substantial improvement to livestock testing, and faster rollout of cattle vaccination. For example, the use of additional, more sensitive tests (such as Actiphafe or Enferplex tests) could enable infected cattle that are not detected using validated tests to be managed on farm as productive parts of the business.

Environmental experts - including eNGOs - should have the opportunity to review and input into draft recommendations concerning cattle measures **before** the national strategy is finalised.



Bovine TB in deer

The science is clear that bovine TB transmission primarily occurs between cattle. The focus of the national strategy, and actions and resources to tackle bTB, must therefore remain on cattle measures.

Wildlife and Countryside Link share concerns raised by other eNGOs regarding the recommendations on deer, and the implication that this should form a significant part of the new national strategy. Such a recommendation maintains a focus on wildlife as a significant source of bTB in cattle, with no clear evidence of its role in spreading bTB to cattle.

Draft recommendations 8 to 11 all concern action on deer yet, as stated, the scientific evidence shows that cattle to cattle transmission is by far the most significant driver of bTB. The focus of the national strategy – and resources for managing bTB – must therefore be on cattle measures and supporting farmers. Where there is a risk of transmission from deer to cattle, this can, and should, be managed primarily through biosecurity measures, such as improvements in feed and hay storage.

We share the view of the RSPCA that whilst there may be merit in interventions such as pre-movement testing of TB in deer herds (Recommendation 9), this should be first subject to cost-benefit analysis to understand whether this is the most effective and impactful use of resources.

Summary of Wildlife and Countryside Link position on the draft recommendations:

Recommendation from the Badger and Other Wildlife Working Group	Wildlife and Countryside Link position
Recommendation 1 – Wider roll out of industry-led badger vaccination programmes in targeted locations	We support the roll-out of badger vaccination for the purpose of managing bTB within badgers, to improve badger welfare and population health. Badger vaccination will not be an effective tool for managing bTB in cattle, and should not be promoted or used for this purpose in the new strategy.
Recommendation 2 – Further research and data collection to evaluate the effectiveness of badger vaccination at controlling TB	This research could prove helpful to address gaps in knowledge of bTB prevalence within badgers.
Recommendation 3 – Carry out increased TB surveillance in badger populations	This recommendation should be updated to clarify that, if further badger surveillance is to be conducted, Badger Found Dead surveys and post-



	mortems of roadkill must take priority over testing of live badgers within the new strategy.
Recommendation 4 – Improve the accessibility and availability of training for badger vaccination	We support improving the accessibility and availability of training for badger vaccination, for the purpose of managing bTB within badgers.
Recommendation 5 – Take proactive steps to improve communication and increase awareness of badger vaccination as a tool for controlling bTB	We are supportive of improving communication and awareness regarding badger vaccination, but this must be to clarify that badger vaccination has a role in managing bTB within badgers, and will not be effective at managing bTB within cattle herds.
Recommendation 6 – Increase non-government input into decisions regarding controlling bTB in wildlife.	We strongly support that non-governmental input to decisions regarding controlling bTB in wildlife should increase. This should include the permanent addition of environmental, wildlife, animal welfare and disease control expertise on the bTB partnership.
Recommendation 7 – Carry out further work to determine the role of lethal badger control in the future bTB eradication strategy.	We strongly oppose this recommendation. There should be no role for lethal badger control in the national strategy going forward; there is no scientific evidence to justify the use of culling.
Recommendation 8 – develop a national wild deer bTB surveillance strategy.	We are concerned that a focus on deer could distract from cattle measures, which scientific evidence shows will be key to managing bTB. Focus and resources should be prioritised for cattle measures and supporting farmers. Any deer measures should be subject to cost-benefit assessments.
Recommendation 9 – Implement mandatory pre-movement bTB testing in deer herds.	We are concerned that a focus on deer could distract from cattle measures, which scientific evidence shows will be key to managing bTB. Focus and resources should be prioritised for cattle measures and supporting farmers. Any deer measures should be subject to cost-benefit assessments.
Recommendation 10 – improve stakeholder engagement including training deer stalkers.	We are concerned that a focus on deer could distract from cattle measures, which scientific evidence shows will be key to managing bTB. Focus and resources should be prioritised for cattle measures and supporting farmers. Any deer measures should be subject to cost-benefit assessments.
Recommendation 11 – Take steps to ensure that future deer management strategies consider	We are concerned that a focus on deer could distract from cattle measures, which scientific evidence shows will be key to managing bTB. Focus



TB and maximise opportunities for surveillance.

and resources should be prioritised for cattle measures and supporting farmers. Any deer measures should be subject to cost-benefit assessments.