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Dear

Bovine TB policy and badgers

The Badger Trust believes that the government is betraying public trust on its bovine TB policy, following its response to the Godfray Review and in light of its current consultation on badger vaccination.

In March 2020, in the long-awaited response to the Sir Charles Godfray TB Strategy Review, the government appeared to confirm that intensive badger culling would be phased out in the next few years, to be replaced by badger vaccination.

The resulting headlines across the media, supported by the Defra press office, talked of a seismic shift in policy and an imminent end to badger culling, a view now largely accepted by both politicians and the wider public.

The reality is very different, as key aspects of the TB Strategy Review have now been dropped and plans to cull badgers even longer term and across the whole country have been laid bare.

In May, Natural England approved seven new supplementary badger cull licences. By the end of August, Natural England is expected to approve a further ten new badger cull licences in the High Risk, 'Edge' and Low Risk areas of England. England will see a huge expansion of culling from Cornwall to Cumbria and east to Lincoln which could well bring the total number of badgers killed so far to 200,000.

Over the longer term, the government's plan to allow culling to remain an option where epidemiological assessments indicate that it is needed, could result in reactive culling licences being issued across wide parts of England. Natural England could issue up to 50 more badger cull licences by 2025, pushing the total kill figure up to 400,000, and causing local extinction in areas of England the badger has inhabited since the Ice Age.

These plans are based on subjective judgements about the source of infection in badgers by local vets, who have been found to attribute an impossibly high proportion of cattle TB infections to badgers; a recent report published by the Derbyshire Wildlife Trust which shows that research, produced by the Animal and Plant Health Agency (APHA) and used by farmers to justify a cull of badgers in Derbyshire, was flawed and inaccurate.

Scientific evidence (from the Randomised Badger Culling Trial and more recent bacterial genome sequences) indicates that most herds are infected by other cattle. Badger Trust also questions why the results from the long awaited study into bTB in RTA badgers (Badgers Found Dead Study) has still not been released. Information provided to individuals suggests that the incidence of bTB in badgers was much lower than widely stated.

Despite the findings of the Godfray review, which made clear that the focus should now be on cattle and non-lethal measures and a lack of evidence to support wider culling, no concrete action has been taken to introduce a National Badger Vaccination Strategy. This would see increased public funding, training and equipment for badger vaccinators, alongside a government communication campaign promoting the scientific benefits of badger vaccination to farmers and landowners and an immediate end to culling in edge and low risk areas.

Research published in People and Nature by Benton et al in April 2020, suggests that badger vaccination, even when led by non-governmental groups, is practically feasible and may achieve high levels of coverage consistent with disease control benefits. Unsurprisingly, barriers to adoption are due to a lack of public funding, landowner take-up and effective communication by Defra on its benefits.

The government's recent consultation on introducing 'no cull buffer zones' around vaccination schemes is ostensibly aimed at reducing the risk of vaccinated badgers being killed by cull contractors. However, in practice the proposals will only serve to minimise new vaccination schemes and cripple or destroy existing schemes. Already, badger vaccination schemes in edge areas are seeing landowner drop out rates of up to 50% in expectation of a cull. Badger Trust objects very strongly to the consultation and considers it to be fatally flawed.

The recent judgement handed down by Mrs Justice Andrews DBE in the Judicial Review case on the Derbyshire badger cull licence decision, appears to be the catalyst for this consultation. Culling vaccinated badgers is unpalatable at the highest levels of government. The Prime Minister Boris Johnson and the Defra Minister of State Lord Goldsmith were both shown to support a move from badger culling to vaccination in the Judicial Review judgement. However, this has not prevented the government from presenting a false image it is protecting badger vaccination, when in fact it is implementing policies which will undermine and destroy badger vaccination projects.

The buffer zones suggested would be wholly ineffective, prevent vaccination schemes from expanding and allow culling in areas where previously vaccination was part of a cordon sanitaire approach. Not only that, the vast majority of schemes are unlikely to qualify for even the smallest and most ineffective buffer and stand to have them removed again when so many badgers are culled that they cannot vaccinate enough to qualify.

Taking account of these serious concerns, Badger Trust is calling on the government:

1. To immediately halt the issuing of any new cull licences in the Edge or Low Risk Areas which threaten badger vaccination projects;
2. To immediately halt the fatally flawed vaccination consultation;
3. To ensure farmers and landowners move to badger vaccination after four year cull licences in High Risk Areas come to an end;
4. To base its bovine TB reduction strategy going forward primarily on improved cattle TB testing, cattle movement and bio security controls, and TB cattle vaccination;
5. To move ahead rapidly with implementing a National Badger Vaccination Strategy;
6. To provide a formal response to the complaint submitted to the Bern Convention on the impact of widespread badger culling on the long term survival of the badger population in wide parts of England;
7. To release the results of the collaborative survey of badger carcasses for evidence of TB, undertaken by teams at the University of Surrey, Nottingham and Liverpool in 2016.

Could you please relay my concerns to The Rt Hon George Eustice MP, Secretary of State for the Environment Food and Rural Affairs?

Yours sincerely