

Response ID ANON-622Z-CY4C-7

Submitted to Bovine TB: Consultation on proposals to evolve badger control policy and introduce additional cattle measures
Submitted on 2024-05-13 16:55:23

Introduction

1 Would you like your response to be confidential?

No

If you answered Yes to this question, please give your reason.:

2 What is your name?

Name:
Vanessa Mason

3 What is your email address?

Email:
vanessa@somersetbadgers.org.uk

4 What is your organisation?

Organisation:
Somerset Badger Group

Proposal 1: To introduce a targeted badger intervention policy

5 To what extent do you agree or disagree with the stated objective of a targeted badger intervention policy?

Strongly disagree

6 Do you agree with the requirement that badger culling under the proposed targeted badger intervention policy be allowed in clusters of cattle infection with high herd incidence, after removing cattle movement related breakdowns?

I don't know/I don't have enough information

7 Should there be an annual cap on the number of clusters that can be licensed to undertake badger culling?

I don't know/I don't have enough information

8 What other factors should be taken into consideration in defining a cluster under the targeted badger intervention policy? (optional)

What other factors should be taken into consideration in defining a cluster under the targeted badger intervention policy? (optional) :

The Government's proposal seems to presume that badgers are the only cause of bTB infection and that by continuing to cull badgers this will have a positive effect on the level of bTB in cattle herds. This is despite the fact that there is no empirical evidence that culling badgers has reduced bTB in cattle over the 11 years of the cull. Several Government reports state that it is impossible to isolate badger culling from other cattle control measures when determining how effective badger culling has been. The authors of the Downs et al. (2019) report and the subsequent Birch et al (2024) report which the Government refers to, have both acknowledged that it is not possible to single out badger culling from other cattle-based control measures. It is a known fact that the greatest transmission risk is from cattle to cattle, yet no other cattle control options, nor their likely outcomes in controlling bTB, are being presented. We believe that the Government has a duty to consider and present all possible options when asking the public to make informed decisions about a proposed policy which is inhumane and risks local extinctions in badger populations within cluster areas.

For example, the current bTB testing regime (mostly by the use of the SICCT Test which does not identify at least 20% and potentially up to 50% of infected animals) is wholly inadequate in controlling bTB in cattle. What additional more accurate testing is going to be introduced and made mandatory on farms within the cluster areas to ensure the prevalence of bTB in the herds is significantly reduced to prevent cattle reinfesting cattle, badgers and other wildlife such as Deer?

At 5.4 the consultation document states, "We consider it both proportionate and important to make sure culling remains available for use in areas where the underlying epidemiological evidence suggests badgers are a part of the problem". No specific information has been shared which helps responders to understand what epidemiological evidence will be used. To date, very little monitoring of bTB in badgers or other wildlife has been carried out since the culls began to substantiate that badgers are a major source of infection and therefore a risk to cattle. Where monitoring results have been published, the rate of infection in badgers was low. In 2016, 994 badgers, selected from 9 High Risk Area culling operations, were tested with only 46 (4.6%) testing positive for bTB (TB surveillance in wildlife in England February 2018) . Between 2018 and 2019 in the Low Risk Area of Cumbria, 676 badgers were tested, only 42 (6%) tested positive with genotype 17z, the same genotype believed to have originated in cattle imported from Ireland (TB surveillance in badgers during year 1 badger control operations in eastern Cumbria, Low Risk Area - 2018). In the wider cull area only 1.7% of badgers tested positive in 2018 and none tested positive in 2019 and only 3 of 317 badgers culled in the buffer zone tested positive (Summary of 2019 badger control operations. March 2020).

The proposal does not confirm that any testing of badgers for bTB will be carried out. How can the Chief Veterinary Officer possibly determine that badgers are a major issue, and that culling is justified unless this is based on substantive testing data, i.e. sound epidemiological evidence. In addition, no specific criteria for the decision-making process have been shared.

Cattle movements are recognised as a major risk factor in the on-going transmission of bTB. The Government's decision to introduce improved controls has undoubtedly had a major impact on bTB transmission. What additional improvements could be made in areas where cluster culling is being proposed?

Defra openly supports badger vaccination. Our badger group together with other trained badger vaccinators continue to work very hard to deliver this scientifically proven effective alternative to culling. It is extremely disappointing that the Government is not seeing this as a robust and viable alternative to the proposed cluster culling. At 5.4 the key benefits of badger vaccination are not clearly stated, instead very questionable advantages of culling over vaccination are quoted. The following key benefits of vaccination should also have been listed:

- Results in 74% fewer badgers testing positive for Bovine Tb
- Cubs born into vaccinated groups have 80% less chance of getting Bovine Tb
- Only 30% of the badgers need to be vaccinated to start protecting unvaccinated cubs
- Reduces progression, severity, and excretion of Bovine Tb in already infected badgers
- Badger populations and clans remain stable therefore reducing the risk of perturbation

The Government's own badger vaccination fact sheet states "Modelling studies also predict that badger vaccination will reduce TB in both badgers and cattle." (Smith et al. (2012) Comparing badger (*Meles meles*) management strategies for reducing tuberculosis incidence in cattle. PLoS ONE) and that " In the Republic of Ireland, large scale badger vaccination has been conducted for a number of years in areas which were previously culled. Analyses has shown that TB incidence rates in cattle were similar in vaccination areas compared to areas which continued with badger culling, suggesting that vaccination was not inferior to culling as a means of disease control in these areas". (Martin et al. (2020) Is moving from targeted culling to BCG-vaccination of badgers (*Meles meles*) associated with an unacceptable increased incidence of cattle herd tuberculosis in the Republic of Ireland? A practical non-inferiority wildlife intervention study in the Republic of Ireland (2011-2017). Preventive veterinary medicine.)

At 5.4 the consultation document acknowledges "the potential welfare and ecological risks associated with badger control". Why then hasn't badger vaccination been mentioned as an alternative to the more inhumane, publicly disliked, and costly option of culling?

bTB can be spread via other sources for example in slurry from infected farms which can then contaminate grazing land and leach into water courses. Little research or monitoring on this transmission route has been carried out, nor have any other additional controls in terms of on farm biosecurity been proposed.

The meaning of a "cluster area" is not sufficiently well defined and therefore could be open to misinterpretation by those who manage it. Unless there are clear well-defined guidelines this could result in large areas where culling is permitted, and badger populations put unnecessarily at risk. Also, there is no specific information on how long culls can carry on for, simply that "they can continue for as long as necessary, led by evidence". What specific evidence will lead the decisions on whether to carry on culling or stop culling?

9 Please give reasons for your answers to this section (optional).

Please give reasons for your answers to this section (optional):

We responded to question 6 by selecting option "d" and to question 7 by selecting option "c" as insufficient information was provided in the consultation document for us to make an informed response.

Our response to question 8 seeks to highlight real areas of concern with the proposed policy of introducing "targeted badger intervention", i.e. continued culling of badgers in High Risk Areas and Edge Areas. The lack of detailed substantive information; the lack of more accurate cattle testing and better cattle movement controls; the lack of sound evidence that badgers pose a major risk in transmitting bTB to cattle and culling them reduces bTB in cattle; the fact that no badgers will be tested for bTB prior to a decision to allow culling in a "cluster area"; the fact that there is no information on estimated costs for the proposal; and the fact that culling badgers is the only proposed option and that no other appropriate alternative controls like badger vaccination are being proposed, suggests that this proposal is not robust and is inappropriate.

Proposal 2: Licence and associated conditions for badger culling under a targeted badger intervention policy

10 To what extent do you agree or disagree there should be a separation of Natural England's statutory conservation advice from licensing decisions?

Strongly disagree

11 Do you agree that the Secretary of State should assume the role of licensing authority for culling under a targeted badger intervention policy?

No

12 Please give reasons for your answers to this section (optional).

Please give reasons for your answers to this section (optional):

The role of Natural England is to provide independent advice and oversight to ensure that England's nature and landscapes are protected for people to enjoy and for the services they provide. We see no benefits in removing Natural England's advice and oversight, rather it increases the concern that insufficient independent controls will be in place to ensure badger populations do not suffer local extinction. There is currently very limited independent

monitoring of badger culling and licence compliance, and this would effectively mean there would be none at all.

13 Do you have any comments on the Information for Applicants at Annex B for carrying out the culling part of a targeted badger intervention policy? (optional)

Do you have any comments on the Information for Applicants at Annex B for carrying out the culling part of a targeted badger intervention policy? (optional):

Again, insufficient information is given in order to make informed decisions. The differences in the humanness between cage trapping and shooting versus shooting free running badgers or controlled shooting are not presented. Licence holders have to satisfy Defra that they can carryout a cull as humanely as possible, but as was published in the Independent Expert Panel's report on evaluating the humanness of culling free-shot badgers during 2013-2014 culls in Somerset and Gloucestershire , between 6.4% and 18% of free-shot badgers took longer than 5 minutes to die which meant the culls failed the Government's own humane target of 5%. This humaneness measurement is no longer published for the yearly culls. In addition, in 2022 a further 6.6% of free shot badgers were shot and not recovered. The British Veterinary Association also denounces this form of culling as inhumane. Again, Badger Vaccination as a scientifically proven effective and humane alternative to culling is not mentioned.

As published in the Governments reports on badger control operations many areas did not reach the minimum targets. This suggests the badger populations have fallen well below the expected level with the risk of local extinction. Relying on sett data provided by Cull Companies is unreliable in estimating badger population status. The Government's aim to ensure that badger culling will "not be detrimental to the survival of the population concerned" does not in any way go far enough in protecting badgers that are an important species.

Scientific research has shown that the main route of infection is cattle to cattle, yet the current policy does not make robust on farm bio-security mandatory.

14 Do you have any other comments on the proposals for a targeted badger intervention policy? (optional)

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The Government appears to be using the Birch et al (2024) report and the previous Downs et al (2019) report as justification for continued culling. As we have already said the authors of both reports acknowledged that it is not possible to single out badger culling from other introduced cattle-based measures in reducing bTB in cattle. We believe that the way the findings of these reports have been interpreted and presented to suggest badger culling is "highly likely to have contributed to the significant reduction in the disease" (page 10), is misleading to the public.

Proposal 3: Support cattle purchasers by publishing bTB risk information on ibTB

15 Should animal level bTB risk information be published on ibTB?

Yes

16 Please give reasons for your answer (optional).

Please give reasons for your answer (optional):

Somerset Badger Group believe that animal level bTB risk information is vital for farmers to be able to access he risks when purchasing new stock for their farms. Purchasing cattle will always carry some degree of risk but by sharing this information the risks can be significantly reduced with much less likelihood of spreading bTB.

A survey carried out by Defra in 2019 showed that for example a third of farms purchasing cattle did not know the source farm's TB status or TB risk. Implementing this proposal would make a significant difference to reducing the risks for purchasing farms, and would, in our opinion, encourage farms wishing to sell their cattle to make sure their on-farm biosecurity and TB controls were as effective as possible.

Proposal 4: Support responsible cattle movements by publishing bTB risk information on 'supplier' herds on the ibTB mapping application

17 To what extent do you agree or disagree it would be helpful to share information on where herd owners source their stock from?

Strongly agree

18 Please give reasons for your answer (optional).

Please give reasons for your answer (optional):

A significant number of cattle movements are made each year within a complex network, significantly increasing the risks of bTB transmission. To illustrate this, the 2019 Cattle Tracing System report confirmed 158 million individual animal movements had taken place.

As already mentioned, we believe that having this information is vital so that purchasing farms can make proper risk-based decisions, thereby reducing the risks from bTB transmission to their own cattle and protecting their farming operations.

Additional comments

19 Do you have any other comments? (optional)

Do you have any other comments? (optional):

The Government had the opportunity to consult on more effective disease control options which would have better served farmers and their cattle whilst protecting badgers. Instead, they have concentrated solely on one proposal, the unjustifiable continued badger culling. The consultation has not provided sufficient information and substantive evidence for responders to make informed decisions, nor has it given them the opportunity to comment on alternative measures such as badger vaccination and more accurate cattle testing. The consultation questions were worded in such a way that responders were not in a position to answer in the way they would have liked. Consultations should ensure responders have accurate and up-to-date information on which to base their answers and have properly validated financial information with a costs benefits analysis.

Consultee Feedback on the Online Survey

20 Overall, how satisfied are you with our online consultation tool? Please give us any comments you have on the tool, including suggestions on how we could improve it.

Neither satisfied nor dissatisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it. :

The online response form in terms of how it operates appears to be effective allowing for example, people to save a response and come back later to it.

We have already commented on how we felt the way in which questions were designed was not appropriate for allowing responders to answer in the way they wanted to.