



The Wildlife Trusts' response to the Government consultation on Bovine tuberculosis: Proposals to help eradicate the disease in England. March 2021

I am writing on behalf of The Wildlife Trusts to provide additional evidence as part of DEFRA's consultation on Bovine tuberculosis in England. The Wildlife Trusts have noted the Government's much welcome commitment to moving away from lethal to non-lethal control of badgers in its response to the Godfray review. However, we have grave concerns about the recent consultation issued in January this year on the next phase of the 25-year strategy to eradicate bovine TB in England by 2038.

The consultation proposes to stop issuing the current intensive badger cull licences for new areas after 2022. This means that four-year culling licences can still be issued in 2021 and 2022, therefore allowing culling to continue up to 2026. This may result in more than 130,000 badgers being killed, on top of an estimated 140,830 badgers that have been shot since the cull began in 2013, taking the overall total number of badgers shot to nearly 300,000. The total badger population in England and Wales was estimated to be around 485,000 in 2017, so by the time culling stops over 60% of the badger population in England will have been removed from the countryside.

Thousands more badgers face being shot this autumn. Natural England has recently stated that they have received 12 licence applications/expressions of interest in respect to 2021 badger control licensing. More than 40 existing four-year licences will continue in 2021 alongside new licences if they are granted by the UK Government. Areas where new licences may be granted include Berkshire, Hampshire, Herefordshire, Northamptonshire, Oxfordshire, Shropshire, Staffordshire, Warwickshire, West Midlands, Wiltshire and Worcestershire. Berkshire, Hampshire and Northamptonshire are new counties where culling could begin in autumn 2021.

There is no reliable peer reviewed evidence to show that badger culling alone is having a significant impact on lowering bovine TB in cattle in or around the cull zones. Despite this, large numbers of badgers will continue to be shot through the Government's current proposals to issue new four-year licences in 2021 and 2022.

The role of wildlife in transmission of bovine TB has been greatly overstated by the Government, which has resulted in the public and the industry being grossly misled on this matter. Bovine TB is primarily a cattle disease spread by cattle. Cattle to cattle transmission is the major cause of infection and spread of bovine TB. Every badger could be shot in England, but bovine TB would still remain in cattle herds. An improved testing regime is therefore central to any strategy for disease control and eradication. The ongoing large movements of cattle across the country continues to be one of the most significant factors in the spread of bovine TB. We welcome the proposals in the current consultation to improve the testing regime and the movement of cattle that may be infected with bovine TB must be brought to an end as quickly as possible.

In the consultation paper there is very limited reference to badger vaccination and a commitment to develop a future badger vaccination policy. If the Government is serious about moving to non-lethal control of badgers through badger vaccination, then it needs to rapidly develop its policy and strategy on exactly how it will achieve badger vaccination at scale across England. At the moment this detail is sadly lacking.

There is a serious risk of vaccinated badgers getting shot in the Edge Area parts of England through current badger control licences and any new ones that will be issued in 2021 and 2022. Landowners can still switch from vaccinating badgers on their land to shooting badgers even though their badgers have been vaccinated. In 2020, this happened in Nottinghamshire



and Leicestershire where Nottinghamshire and Leicestershire Wildlife Trusts have been running a significant vaccination project supported by the Government but made effective only by the significant taxpayer-free contribution of hundreds, maybe thousands, of volunteer hours.

The no-cull buffer zones proposed by the Government to protect vaccinated badgers are simply not large enough to stop vaccinated badgers wandering into cull zones and getting shot. It is not possible to run culling alongside vaccination of badgers, which the Government is proposing, without the risk of increasing numbers of vaccinated badgers, vaccinated through Government funding and public donations, continuing to get shot. This is an appalling waste of taxpayers' money, which is helping to fund the vaccination of badgers, as well as a huge waste of the significant time and effort of the vaccinators, many of whom are volunteers. Current estimates are that the badger cull has cost the Government at least £47 million up to 2020.

Clarity is urgently needed on a national badger vaccination strategy. How will such a national scheme be funded and how will it be delivered at scale? In addition, the Government needs to step up its support for badger vaccination and work to convince the farming community about the benefits of such an approach. We want to see a national badger vaccination strategy ready to be rolled out by 2023 at the latest.

The Wildlife Trusts are solution focussed and have worked hard to demonstrate over nearly a decade that badger vaccination is a viable alternative to the cull and that it can be carried out professionally at scale. We have been working closely with vets, farmers and landowners to deliver badger vaccination and have shown that it is possible. Many of these vaccination programmes have been supported by the Government in the Edge Areas for bovine TB under the BEVS scheme (Badger Edge Vaccination Scheme). It is now time for the Government to step up its commitment to badger vaccination.

The consultation also states that culling will only take place where the epidemiological evidence supports it. The epidemiological pathway data collection process used to identify badgers as a disease risk to cattle is deeply flawed. The Wildlife Trusts have serious concerns about the methodology used in making epidemiological assessments about the level of bovine TB in badgers which is then used to justify the badger cull. Derbyshire Wildlife Trust released a report in March 2020 which revealed that the methodology used is subjective and biased towards badgers being the cause of a large number of outbreaks of TB in cattle without clear science to support the claim. Data from the Animal and Plant Health Agency claimed that TB is endemic in badgers in parts of Derbyshire but failed to provide supporting data.

The vast majority of badgers being killed are never tested for bovine TB so there is simply no scientific evidence to support the argument that badgers are heavily infected, which is the justification for the ongoing badger cull.

The Wildlife Trusts are conscious of the hardship that bovine TB causes the farming community and the need to find the right mechanisms to control the disease. Our involvement with this issue over a long period, and the results of previous culling trials, have led us to conclude that a sustained programme of badger vaccination where required, deployment of a cattle vaccine alongside improved biosecurity measures, and improved testing and controls on cattle movement would be the best means of tackling bovine TB.

The Government says it is committed to ensuring it has a comprehensive and balanced package of measures to tackle bovine TB. A more balanced approach would be following the example in Wales, where the Welsh Government do not allow the culling of badgers to take place. The enhanced biosecurity and disease surveillance methods used by the Welsh Government means that they do not have to resort to shooting badgers.



To conclude, The Wildlife Trusts have always been and still remain firmly opposed to the badger cull. We believe that it is an ineffective tool in the fight against bovine TB. There is no strong evidence to support the justification of intensive culling of badgers, a protected species by law, in delivering a meaningful reduction in herd breakdowns.

Ongoing intensive culling of badgers is simply not compatible with the Government's stated aim in the consultation paper of "*enhancing the environment and biodiversity*." Removing such large numbers of badgers from the countryside will inevitably have significant ecological consequences.

There is real concern that continuing with a policy of shooting badgers will lead to local extinctions of this much-loved mammal. This would represent one of the largest ever culls of a protected mammal to take place in this country. The ongoing destruction of a protected species will do nothing to help tackle the global biodiversity crisis and undermines the Government's commitment to be the first to leave the environment in a better state.

The Wildlife Trusts have also galvanised the wider public to respond to this consultation – and more than 36,000 members of the public have already responded as individuals backing our key points and adding further views on the proposals. We have included a few of the comments below for you to review:

"I believe it is so important to value all wildlife. It makes no sense to continue culling badgers when there is an effective vaccination programme that can be implemented."

"I am so disappointed that once again my taxes are being wasted in funding an exercise that evidence shows will NOT be effective as a solution to tackling bTB. The scientific community has condemned culling and there is almost zero public support for this outside of the farming lobby. Please pause, reflect on the evidence, and do the right thing for wildlife, science, and public funds."

"As a farmer myself I feel there must be a better solution than this badger cull."

"As a scientist I have yet to see any proper justification for culling badgers. The whole policy appears to depend on assertions in the face of contrary data & evidence. The first step in controlling bovine TB ought to be the effective control of disease transmission by the agricultural industry. Only when the industry has really put its own house in order should there be any consideration of other measures."

"As an ecologist and conservationist I am deeply disappointed and saddened at the ongoing saga of the badger cull. It is disgusting that these supposedly protected animals are being subjected to this cruel and unnecessary onslaught. Culling does not work. It is not the best way forward. Please listen to the science, the experts and the conservationists."

"It's called Bovine TB for a reason. It is from cows not badgers."

"We should value our wildlife, not kill it. Vaccinate the cows."

The Government's proposal to continue to allow new badger control licences to be issued is simply not compatible with their 2019 manifesto pledge to develop "*the most ambitious environmental programme of any country on earth*."

It is time for the Government to draw a line under this policy and stop any new cull licences from being issued. Allowing cull licences to be issued up to 2022 means that thousands of badgers will continue to be shot until at least 2026.