

Bovine tuberculosis: consultation on proposals to help eradicate the disease in England.

Wildlife and Countryside Link Response: March 2021

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 58 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas.

This response is supported by the following Link members:

- Badger Trust
- Born Free Foundation
- HSI UK
- RSPCA

WILDLIFE AND COUNTRYSIDE LINK POSITION ON THE BADGER CULL POLICY

Wildlife and Countryside Link does not support the badger cull policy. The huge costs of the policy, in terms of animal welfare, biodiversity and finance, have not been matched by evidence of its efficacy in controlling disease.

Despite over 140,000 badgers being killed under cull licenses since 2013, Government has provided no reliable scientific evidence to prove that badger culling alone is significantly reducing bovine TB in cattle, in or around the cull zones.

A majority of badgers killed in culling operations in 2019 and 2020 were by a controlled shooting method, which the British Veterinary Association considers to be inhumane, and Government's independent expert panel has found could result in 7 - 23% of badgers taking over 5 minutes to die of blood loss and organ failure.

Despite the badger cull being launched in 2013 as an industry led project with the majority of the costs being met by farmers and landowners, in reality the public cost of the policy is now estimated to have exceeded £70 million, taking account of equipment, training, monitoring, policing and legal defence costs.

Despite badger vaccination being a viable, non-lethal alternative for reducing Bovine TB in disease free badgers, Government has made very little effort to promote or demonstrate its scientific value to

farmers and landowners or provide the necessary funding and training support to increase the level of badger vaccination across England.

Government has laid out an exit strategy for badger culling, but there remains a serious risk that up to 300,000 badgers could be killed by the time the policy is finally halted.

This will be the largest destruction of a protected species on record and could push the badger to the verge of local extinction in areas of England which it has inhabited since the Ice Age. This could also result in an infringement of the government's international commitments to protect the badger population under the Bern Convention.

Government could kill every badger in England, but Bovine TB will remain in cattle herds as it is primarily a cattle-based disease.

We believe the long-term solution to reducing the spread of Bovine TB is a combination of improved TB cattle testing, tighter biosecurity controls on farms, tighter cattle movement controls and risk-based trading, and the vaccination of both cattle and badgers.

This disease control policy will be better for farmers, taxpayers and the future of protection of badgers and cattle.

BOVINE TB CONSULTATION

Q1. Do you support the proposal to introduce mandatory post-movement testing of cattle moving from higher TB risk regions of Great Britain (the HRA, Edge Areas on six-monthly surveillance testing and Wales) into those parts of the Edge Area where herds are on annual surveillance testing?

Yes.

Movement of infected cattle onto previously uninfected premises is a significant source of spread of Bovine TB. This risk is partially mitigated by pre-movement testing of cattle which has been compulsory for cattle over six weeks old since 2016. However, the limited sensitivity of current testing regimes means that this does not identify all infected cattle.

Mandatory post-movement testing would be useful but should be introduced as a part of a broader mandatory risk-based trading scheme, which prevents animals being moved from higher risk areas to lower risk areas in the first place. All exemptions to mandatory testing should be removed.

Mandatory post-movement testing of cattle moving from higher TB risk regions has been shown to have a strong deterrent effect on the cattle import trade in Scotland and is also likely to do the same in England.

Reducing the geographical spread of Bovine TB through better regulation of cattle movements must be the highest priority, despite any additional costs to the farms concerned.

Post movement testing will be recorded on the Livestock Information Service and could usefully contribute to the risk score of cattle herds which are sent to market.

The Sir Charles Godfrey TB Review confirmed that just under 5.5 million cattle were on agricultural holdings in England in 2016, and that there were around 1.7 million cattle movements between different TB risk areas in this 12-month period. It is believed this number of movements has remained broadly similar over the past 5 years and includes substantial numbers moving from higher to lower risk areas.

Risk based trading has yet to be embraced by large sections of the farming community. Sir Charles Godfrey stated in his review that this could be due to a lack of confidence in the value of the information available, and also because of an under appreciation of the risks of purchasing infected cattle.

The Livestock Information Service needs to be further developed to carry the complete location history of each animal and other specific information relevant to Bovine TB risk, such as its individual testing history and that of other animals in the herds it has been part of.

This raw data must then be transformed into a usable risk-based trading index or score via scanning ear tags, which can then be presented to any potential cattle purchaser in sales catalogues or at large screens at cattle markets.

Government must establish an information campaign working with the farming and livestock veterinary industry to raise the awareness, importance and value of risk-based cattle trading to reduce the spread of Bovine TB.

Q2. Do you agree with the assumptions and the assessment of costs and benefits in the Regulatory Triage Assessment on introducing post-movement testing to parts of the Edge Area?

Yes.

It is estimated that the public costs of killing just over 140,000 badgers since 2013 is over £70 million to date, so any costs for cattle-based measures need to be considered in comparison.

Not all costs of herd breakdowns are borne by the individual farmer, as they are partly compensated under the TB cattle slaughter programme. Also, any failure to stop the spread of Bovine TB to other cattle herds increases costs for the wider farming industry and public purse. It also leads to increased spread of Bovine TB into the badger population, which results in more costly culling operations.

All options for controlling the spread of bTB among cattle should remain on the table.

Q3. Do you agree that Defra should revise the current policy for using the more sensitive IFN-y test in the HRA and Edge Area, so in addition to persistent breakdowns, the use of the test is mandatory where the below criterion is met?

- **TB breakdowns in the HRA and six – monthly Edge Area counties that occur within 18 months of the herd regaining free status following a previous OTFW breakdown.**

Yes.

Successful control of Bovine TB relies on consistent identification and removal of infected cattle from herds, and the prevention of movement of undetected infected cattle. The IFN-y test, particularly when used in combination with the existing SICCT test, increases testing sensitivity and should be used to identify infected cattle in all herd breakdowns rather than the limited ways it is currently employed.

This test has the additional advantage of detecting animals at an earlier stage of the disease. Its use will therefore identify and remove animals at an earlier stage of disease progression, reducing the chance of onward transmission.

In 2018, the IFN-y testing of 249 OTFW herds on the HRA identified a further 4,898 infected cattle, which would not have been disclosed with SICCT testing alone. However, these 249 holdings represented only 13% of all the OTFW cases in the HRA in 2018. This means that if the remaining 87% OTFW cases in the HRA had also been IFN-Y tested, this could have disclosed another 32,000 additional infected cattle in the HRA in 2018.

Given that the number of infected cattle identified by the SICCT test in the HRA was around 20,000 in 2018, this indicates that the SICCT test may have failed to detect approximately 64% of the infected cattle in the HRA. This would indicate the sensitivity of the SICCT test to be lower than the 80% used by Defra, and more likely to be in the region of 50% or lower, as has been identified in review publications.

The retention of these very high numbers of infected cattle in the OTF declared herds of the HRA is inevitably leading to a very high number of recurrent breakdowns and the transmission of disease to herds within the HRA and beyond.

In addition, the presence of infected cattle in these herds is resulting in constant shedding of the disease to the holdings, farm buildings, equipment, slurry, manure, grazed pastures and the wider farming environment.

In view of the enormity of the undetected infected cattle issue, the IFN-Y test should be employed on all confirmed breakdowns in the High Risk, Edge and Low Risk Areas

Q4. Do you agree with the proposal to cease the issuing of new Badger Disease Control (intensive cull licences) after 2022?

Wildlife and Countryside Link does not support the badger cull policy, and does not agree with the issuing of licences to kill badgers.

A further two years of issuing intensive badger cull licenses could see culling extended to the majority of the TB High Risk and Edge Areas and the number of badgers culled per year could rise substantially to over 50,000 per year. This is approximately 10% of the estimated badger population.

To date, over 140,000 badgers have been killed as a result of the cull policy since 2013, at an estimated public cost of over £70 million. This is the largest destruction of a protected species on record.

12 new intensive cull licence applications have been submitted to Natural England for 2021, including for culling in the new counties of Hampshire and Northamptonshire. A similar number is expected to be submitted in 2022.

Over 160,000 more badgers could be killed before all intensive cull licences are finally brought to an end. This could bring the final total of badgers killed as a result of the cull policy to over 300,000.

For comparison, 10,979 badgers were culled over the course of the Randomised Badger Culling Trial between 1998 and 2005

Badger removal on this scale, could have a serious impact on badger population levels across England and is the subject of a complaint before the Bern Convention, which will be reviewed in September 2021.

The current policy is to reduce badger population density by at least 70% but estimating badger numbers is difficult, and as Sir Charles Godfray stated in his TB Review, "it is unclear the degree to which region wide badger culling would affect the viability of the species in these areas and what the large-scale ecological effects would be."

Government continues to rely on the publication by Downs *et al.* to justify continued culling, when the conclusions of that publication have been questioned and are now outdated, and without providing updated evidence to show that badger culling is having any significant impact on bovine TB incidence or prevalence in cattle. We therefore urge DEFRA to cease issuing further licences without delay and bring the cull to an immediate end.

Q5. Do you agree with the proposal that new Badger Disease Control (intensive cull) licences issued in 2021 and 2022, could, after 2 years of culling, be revoked after a progress evaluation by the CVO?

Wildlife and Countryside Link does not support the badger cull policy, and does not agree with the issuing of licences to kill badgers.

The APHA Bovine TB epidemiology reports are published biannually or annually. The reports review the situation relating to bovine TB in Great Britain at a country and national level.

The Derbyshire Wildlife Trust commissioned a report into the Year End Descriptive Epidemiology Report for the edge Area of Derbyshire in 2018.

The report included an evaluation of the methodology used by APHA to assign attribution to the source of new herd breakdowns.

The evaluation reached the following conclusions.

- APHA relies on a risk assessment which depends upon accurate hazard identification and risk pathway analysis.
- But in all these areas there is neglect of uncertainties and unknowns coupled with unsupported bias towards badgers
- There is a lack of clarity as to the evidence used to support on-site analysis as regards wildlife
- There seems to be misconceptions about the likelihood of contact between badgers and cattle leading to disease transfer.
- The Disease Risk Forms identify badgers as a likely source of infection but there is no detailed disease data for the badger population.

Defra have recognised the weakness of the system in their 'Next Steps' response to the Sir Charles Godfray TB Review.

They have committed to improving bovine TB epidemiology, including better understanding of the sources and pathways of infection for herds affected by Bovine TB breakdowns. It will support APHA to refresh the format, content and use of the DRF to enhance the efficiency of epidemiological data gathering and its accuracy, as well as improve data extraction and analysis.

APHA are undertaking a short-term study to document the DRF process from investigation at the farm through to analysis and reporting. This is scheduled for publication in June.

It is critical that the CVO has access to systematic and accurate gathering of epidemiological data to lead to more accurate analysis of transmission pathways. This will allow improved understanding of how disease is spreading at local and national level, enabling accurate decisions to be taken on revoking cull licenses after 2 years. Reliance on the current process will inevitably lead to reliance by the CVO on biased and inaccurate evidence of the role of badgers.

Q6. Do you agree with the proposal to reduce the initial financial commitment required from the companies prior to application for a Badger Disease Control licence to the cost of three years of culling?

No.

The badger cull policy was sold to the public as being industry led, with limited costs to the public purse. In reality, the policy has been largely carried by the taxpayer to an estimated cost of £70 million since 2013, taking into account training, equipment, monitoring, policing and legal defence costs.

There can be no justification for more public funding for cull contractors for a policy which has proved hugely costly, cruel and largely ineffective to date.

Q7. Do you agree with the proposal to restrict SBC licences to a maximum of two years, and to prohibit the issuing of SBC licences for previously licensed areas or areas licensed for Badger Disease Control after 2020?

Wildlife and Countryside Link does not support the badger cull policy, and does not agree with the issuing of licences to kill badgers.

Supplementary cull licences should no longer be used as a method of maintaining disease control in badgers, after intensive cull licences expire, since there is no evidential basis for their efficacy.

Where continued control of disease within badger populations is considered necessary, vaccination should immediately become the humane intervention method for TB control in badgers in place of supplementary cull licences.

Vaccination of badgers will not remove infectious badgers from the countryside. However, over time, vaccination of badgers will reduce the number of badgers that contract the disease and result in a reduction in Bovine TB prevalence in the badger population.

Field studies involving BCG vaccination of over 800 wild badgers resulted in 74% reduction in the proportion testing positive for Bovine TB. Badgers can be easily trapped and vaccinated by trained personnel or volunteers. Furthermore, the cost of trapping and vaccinating badgers is considerably cheaper than trapping and culling once policing costs are removed.

Should Government consider that ongoing interventions are necessary to reduce Bovine TB in badger populations, it should move forward with a national badger vaccination strategy. This should significantly increase the level of public funding for training, equipment and communicating the scientific benefits of badger culling to farmers, landowners and the livestock veterinary industry.

This should include more public funding for research looking into the long-term impact of badger vaccination on lowering bovine TB in cattle, to supplement existing data from badger vaccination field studies and from intensive vaccination programmes in Wales. The Government should also note the

likelihood that vaccination will likely be less effective in a badger population that has previously been subject to culling, because infection prevalence is likely to be higher in a culled population, and the population is likely to consist of trap-shy badgers.

A level playing field must be created to ensure badger vaccination becomes a cost effective, non-lethal intervention method in badgers compared to culling.

All supplementary cull licenses should be ended with immediate effect, with all further intervention via vaccination projects only.

For further information, please contact Wildlife and Countryside Link:

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