

Wildlife and Countryside Link – key policy asks for England’s bovine TB strategy 2025

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This policy document is on behalf of Wildlife and Countryside Link (Link), a coalition bringing together 86 organisations to campaign for the natural world.

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As the UK Government looks to refresh its bTB strategy in 2025, Wildlife and Countryside Link’s Bovine TB (bTB) Working Group recognises its responsibility to support Defra to achieve a meaningful, robust and efficient approach to bTB management.

In this document, we set out 12 key policy points that are crucial for an effective revised bTB strategy. These points bring together action urgently required on (i) cattle vaccination, (ii) livestock biosecurity, (iii) wildlife management, and (iv) wildlife welfare.

Furthermore, we recommend that Defra must evaluate and use lessons learnt from the management of other notifiable diseases in the development of this refreshed bTB strategy. For example, in the management of highly pathogenic avian influenza (HPAI), which follows the international consensus principles for ethical wildlife control, and whereby biosecurity measures are made mandatory when risk level increases.

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

Consultation and collaboration

- 1. Fully representative and inclusive consultation.** Defra must ensure that it consults with a breadth of experts representing all relevant interests and issues when developing and reviewing bTB policy. This must include wildlife ecology, ethical and welfare expertise, which has thus far been lacking in co-design and review processes. Representation must be ensured across all processes relating to the bTB eradication strategy, including the membership of the bTB Partnership.

Cattle testing

- 2. A testing regime with improved sensitivity.** The standard single intradermal comparative cervical tuberculin (SICCT) skin test should be replaced or supplemented with more sensitive methods, tackling hidden reservoirs of bTB in cattle herds where around a fifth¹ to as many as half² of infected cattle may be missed under current testing. Recognising that no test achieves 100% sensitivity and specificity, the Government should introduce a combination of tests, and validation of additional tests, in order to improve testing sensitivity. For example, Enferplex in combination with the skin test.

Cattle biosecurity

- 3. Improved biosecurity on cattle farms.** Given receipt by farmers of public money as compensation for cattle that are prematurely slaughtered under the test-and-removal programme, Government should mandate uptake of biosecurity measures, taking into account evidence that farmers prefer to receive guidance from their own veterinary surgeon rather than external advisors³, but ensuring that veterinary surgeons involved are well informed. This should include a farm-specific bTB management plan on every farm, covering relevant topics (e.g. no shared equipment, double fencing, pasteurising milk for calves, slurry management). Compliance with biosecurity measures should be independently audited; it should be considered whether compliance should be linked with compensation payments.
- 4. Reduce high risk cattle movements.** Inclusion of additional information on the risk of cattle purchases, such as animal-level data on test type and date, as well as seller

¹ TBHub (2020) Use of severe interpretation for trace TB tests. Available at <https://tbhub.co.uk/tb-policy/england/use-of-severe-interpretation-for-trace-tb-tests/#:~:text=The%20ability%20of%20a%20test%20to%20correctly%20identify%20an%20animal,implications%20of%20false%20positive%20results>.

² Nuñez-García J, Downs SH, Parry JE, et al. Meta-analyses of the sensitivity and specificity of ante-mortem and post-mortem diagnostic tests for bovine tuberculosis in the UK and Ireland. *Preventive Veterinary Medicine* 2018;153: 94-107

³ RSPCA (2021) Ruminations on bovine tuberculosis (bTB): A summary of stakeholder responses to the RSPCA's bTB eradication consultation. Available at https://www.rspca.org.uk/documents/1494939/7712578/Ruminations_on_Bovine_TB_2021.pdf/f54cc639-6a3a-060d-7f41-7aec535fa8ae?t=1629294166803

membership of Cattle Health Certification Standards⁴ (CHeCS) or similar schemes. This could promote fewer high-risk cattle purchases, and movements. Encouragement of closed herds where possible. Mandatory risk-based trading should be considered.

- 5. Improve biocontainment.** Quarantine facilities should be available on every farm that brings in cattle and used for a suitable length of time. This is already mandatory for most cattle assurance schemes. This measure should be combined with appropriate post-movement testing, based on movement risk.

Cattle vaccination

- 6. A safe and effective bTB vaccine for cattle, with associated tests.** A robust evidence base for cattle vaccination, and effective associated testing protocol, with good specificity and sensitivity. Policy should acknowledge the value of cattle vaccination, but not ignore the importance of other, aforementioned cattle measures.

Wildlife management

- 7. The badger cull is brought to a permanent end in 2025.** All current intensive licences are revoked and supplementary licences are not issued, without exception. This includes for any new culling to be introduced - even on a temporary basis - in the Low Risk Areas. This aligns with the government's position that current badger control policy is ineffective, and that after 12 years of culling, the evidence for its efficacy in reducing cattle bTB risk remains at best equivocal. In its place, we propose a non-lethal bTB management programme is swiftly adopted which is (i) grounded in consistent and reliable findings from scientific evidence^{5,6,7,8,9}, and based on a balanced consideration of evidence, (ii) cost effective, (iii) sustainable in offering long-term solutions to bTB eradication, (iv) conducted with all due regard for the

⁴ <https://checs.co.uk/diseases/bovine-tb/>

⁵ Defra. 2018. [A study into the prevalence of bTB in 'found dead' badgers in the Edge Area of England.](#)

⁶ Langton, T.E., et al., 2022. Analysis of the impact of badger culling on bovine tuberculosis in cattle in the high-risk area of England, 2009–2020. *Veterinary Record*, 190(6), p.e1384.

⁷ Torgerson, P.R., et al., 2024. Absence of effects of widespread badger culling on tuberculosis in cattle. *Scientific Reports*, 14(1), p.16326.

⁸ Donnelly, C.A. and Nouvellet, P., 2013. The contribution of badgers to confirmed tuberculosis in cattle in high-incidence areas in England. *PLoS currents*, 5.

⁹ Akhmetova, A., et al., 2023. Genomic epidemiology of *Mycobacterium bovis* infection in sympatric badger and cattle populations in Northern Ireland. *Microbial Genomics*, 9(5), p.001023.

welfare of all affected animals, and (v) ¹⁰ places emphasis on cattle-to-cattle transmission as the focal area for action in order to effectively tackle and eradicate bTB ¹¹¹². The strategy will look at key lessons from devolved administrations to inform bTB management in England.

8. **The badger population is comprehensively assessed across England using best available census methods.**¹³ We support the Government's commitment to introduce a population monitoring programme in 2025 to assess the status of badgers and their setts. This could be effectively achieved in conjunction with research institutes and NGOs who are also conducting work in this area, to ensure a cohesive and joined up approach. Publicly-available results will assist with future population recovery efforts.
9. **Given WOAH disease free requirements to not only address disease in cattle, but also other (feral, wild animals)¹⁴, implement a wider programme of bTB surveillance in wild animal populations (e.g. deer, badgers, wild boar, beavers) to determine other potential wildlife hosts of bTB.** The programme could be delivered with the support of NGOs and research institutes, and focus on identifying established reservoir hosts rather than spill-over hosts. This piece of work would also contribute to, and enhance, the APHA Risk Pathway Assessment.

Wildlife vaccination

10. **Wildlife vaccination is offered in areas where appropriate.** Badger vaccination is offered as a means of preventing the spread of bTB amongst badgers. Wildlife vaccination is adopted as a supplementary option to cattle measures within a new bTB strategy, and not a primary means of tackling bTB in cattle herds, given evidence

¹⁰ van Tonder, A.J., et al., 2021. Inferring Mycobacterium bovis transmission between cattle and badgers using isolates from the Randomised Badger Culling Trial. *PLoS Pathogens*, 17(11), p.e1010075.

¹² Jenkins, H.E., et al., 2010. The duration of the effects of repeated widespread badger culling on cattle tuberculosis following the cessation of culling. *PLoS one*, 5(2), p.e9090.

¹³ Miles, V., Woodroffe, R., Donnelly, C.A., Brotherton, P.N., Ham, C., Astley, K., Aurélio, J. and Rowcliffe, M., 2024. Evaluating camera-based methods for estimating badger (*Meles meles*) density: Implications for wildlife management. *Ecological Solutions and Evidence*, 5(3), p.e12378.

¹⁴ [Terrestrial Code Online Access - WOA - World Organisation for Animal Health](#) Article 8.12.4

demonstrates that badgers are a spill-over host.^{15 16} The Badger Edge Vaccination Scheme (BEVS) and APHA's Vaccinating East Sussex Badger (VESBA) vaccination project to support farmer-led vaccination are continued, building on previous success.¹⁷ Vaccination could be initiated and led by farmers who wish to take part and are well-informed of its logistics and limitations, rolled out through farmer-to-farmer networks⁸, and delivered with the support of NGOs and government.¹⁸

Wildlife welfare

11. Embedding the International consensus principles for ethical wildlife control within the new bTB Strategy and non-statutory codes and guidance. The ethical principles¹⁹ recognise both the legitimacy of concerns people have in human-wildlife conflict situations, and the importance of protecting animals from unnecessary suffering. We accept that in some cases wildlife management may be necessary, but it must be done humanely with interventions in wildlife being considered a last resort and lethal control as the very last option once all other options have been exhausted. The 7 ethical principles would place cattle measures and biosecurity ahead of wildlife interventions (even non-lethal interventions). Even if lethal interventions were considered necessary, the principles would require removing the fewest number of animals possible, so would rule out non-selective approaches. Applying the principles under a new 'bTB Welfare Standards' section will provide a full assessment of any activities which may impact the welfare of wildlife, and provide a robust framework from strategy development through to licensing under Natural England, enabling the Government to adopt an ethical and systematic process to ensure effective welfare standards.

12. A full review of the welfare implications of any activities which could impact animal welfare under the current bTB strategy. Methods of badger control (i.e. non-selective controlled shooting) used under the current bTB strategy were deemed

¹⁵ Akhmetova, A., Guerrero, J., McAdam, P., Salvador, L.C., Crispell, J., Lavery, J., Presho, E., Kao, R.R., Biek, R., Menzies, F. and Trimble, N., 2023. Genomic epidemiology of *Mycobacterium bovis* infection in sympatric badger and cattle populations in Northern Ireland. *Microbial Genomics*, 9(5), p.001023.

¹⁶ Swift, B.M.C., Barron, E.S., Christley, R., Corbetta, D., Grau-Roma, L., Jewell, C., O'Cathail, C., Mitchell, A., Phoenix, J., Prosser, A. and Rees, C., 2021. Tuberculosis in badgers where the bovine tuberculosis epidemic is expanding in cattle in England. *Scientific reports*, 11(1), p.20995.

¹⁷ Woodroffe, R., et al., 2024. Farmer-led badger vaccination in Cornwall: Epidemiological patterns and social perspectives. *People and Nature*, 6(5), pp.1960-1973.

¹⁸ See also: [NFU hopes badger vaccination studies will help towards eradicating bTB – NFUonline](#)

¹⁹ Dubois, S., et al., 2017. International consensus principles for ethical wildlife control. *Conservation Biology*, 31(4), pp.753-760.

inhumane by multiple independent experts^{20,21}, yet these views were not considered by the previous administration.²² A review should include a rigorous assessment of any wildlife intervention methods using the international consensus principles for ethical wildlife control as a guide (see (11)) and decisions made based on assessment outcomes. Furthermore, any wildlife intervention methods should be subject to meaningful independent monitoring, to ensure humaneness tests are being met and with preference always for non-lethal methods.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 86 organisations to campaign for nature, climate, animal welfare and a healthy environment for everyone. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales number 3889519.

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²⁰ British Veterinary Association. 2015. [BVA calls for change to badger culling method and wider roll-out in England.](#)

²¹ Munro, M., 2014. [Pilot Badger Culls in Somerset and Gloucestershire - Report by the Independent Expert Panel. Presented to the Secretary of State for Environment, Food and Rural Affairs.](#)

²² This matter is currently under consideration by the Animal Sentience Committee.