

Link response - Consultation on proposals to evolve badger control policy and introduce additional cattle measures

30th April 2024

This consultation response is on behalf of nature and animal welfare coalition Wildlife and Countryside Link ([Link](#)).

Executive summary

- Bovine tuberculosis is a serious and complex disease affecting thousands of farmers nationally. However, the ‘targeted badger intervention’ policy is not the correct approach to effectively manage and reduce its impact.
- There is no clear scientific evidence to demonstrate that badger culling alone has significantly reduced bovine TB in cattle, in or around cull zones. The inability to isolate the effect of culling from other variables, including cattle measures, is clearly stated in the 2024 Birch et al. study, yet is not acknowledged in this consultation.
- There is a lack of detail to explain critical aspects of the proposed ‘targeted badger intervention’ policy, including the definition of and methodology for assessing clusters.
- The controlled shooting method set out in the ‘targeted badger intervention’ policy has been shown to be inhumane by multiple independent experts. No evidence is provided to explain how the Chief Veterinary Officer has assessed the humaneness of the proposal.
- The proposal does not set out a clear business case for the policy, or for alternative control methods.
- Government must implement a more sustainable approach to controlling bTB, through a combination of badger vaccination and stronger cattle measures.

Wildlife and Countryside Link position on the ‘targeted badger intervention’ policy

Wildlife and Countryside Link does not support the badger cull, or the proposed ‘targeted badger intervention’ policy.

Bovine tuberculosis (bTB) in cattle is a serious and complex disease affecting thousands of farmers nationally, and effective measures should be taken to reduce its impact. It is essential that these measures are legal, sustainable, publicly acceptable, humane, and – crucially – based on credible scientific evidence.

The proposed ‘targeted badger intervention’ policy set out in this consultation does not meet these key tests.

The badger cull policy had significant animal welfare, biodiversity and financial costs, with over 230,000 badgers being killed under cull licenses 2013-2023 at considerable cost to both farmers and the taxpayer. Yet Government has provided no clear scientific evidence to prove that badger culling alone has significantly reduced bovine TB in cattle, in or around the cull zones.

The proposed ‘targeted badger intervention’ policy would allow badger culling to continue in areas where ‘evidence supports the need for its application’. The consultation document draws heavily on the recent Birch et al. study to demonstrate evidence for the efficacy of badger culling in controlling bTB. Yet it does not acknowledge that this study was not a controlled experimental trial, nor that the Birch et al. paper itself states that the effect of culling could not be isolated from other variables, including other Badger Cull Policy (BCP) measures such as Interferon-Gamma testing. Given the significant costs associated with the cull policy, permitting further culling without clear scientific evidence for its efficacy raises significant concerns.

Furthermore, the consultation document does not sufficiently explain how evidence will be used to determine the role of badgers in local disease outbreaks, or the need for culling badgers. It also does not clearly define critical aspects of the proposal, such as the size, limits, and criteria for clusters.

In addition, the proposals would allow licensed badger culling to continue using ‘controlled shooting’, a method that has been used to target around 75% of badgers killed to date, despite the findings of the government’s own Independent Expert Panel that the method failed to meet humaneness criteria, and the subsequent concerns of the British Veterinary

Association.¹ This undermines the claim for the existence of an ‘experienced cohort of practitioners who have a strong track record of delivering culling humanely at a large scale’.

The proposal to transfer responsibility for issuing licenses to the Secretary of State raises further concerns. It is essential that this role must sit with a scientific, independent expert body able to rigorously assess any evidence presented and to publish its decisions and its decision-making processes.

The proposal also does not set out a clear business case for the policy.

Rather than continuing to cull a protected British species at significant cost, Government should implement a more sustainable approach to disease control, through a combination of both badger and cattle measures. This should include:

- Vaccinating both badgers and cattle against bTB, to deliver a sustainable reduction in disease prevalence. Badger vaccination should immediately replace culling as the only permitted badger intervention as part of TB control policy.
- Implementing tighter mandatory biosecurity controls on farms, tighter controls on cattle movements, and strict mandatory risk-based trading in order to prevent cattle from higher risk TB areas being moved to lower risk areas.
- Rollout of improved cattle testing, including exploring enhancing the sensitivity of the cattle testing regime when cattle breakdowns do occur, to increase the detection of residual infections.

Responses to consultation questions

Question (1a): Would you like your response to be confidential?

b. No

Question (1b): If you answered Yes to this question, please give your reason.

N/A

¹ <https://www.gov.uk/government/publications/pilot-badger-culls-in-somerset-and-gloucestershire-report-by-the-independent-expert-panel>

Question (2): What is your name?

Ellie Ward

Question (3): What is your email address?

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Question (4): What is your organisation?

Wildlife and Countryside Link

Q5. To what extent do you agree or disagree with the stated objective of a targeted badger intervention policy?

e. Strongly disagree

Q6. 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?

c. No – not limited enough

Q7. Should there be an annual cap on the number of clusters that can be licensed to undertake badger culling?

a. Yes

Q8. What other factors should be taken into consideration in defining a cluster under the targeted badger intervention policy? (optional) [free text response]

Wildlife and Countryside Link does not support the badger cull, or the ‘targeted badger intervention’ policy. Please refer to our position statement at the start of this document.

As further discussed under Q9., the proposal does not sufficiently define what constitutes a 'cluster'. Without defining these parameters, it is unclear how the 'targeted badger intervention' policy could proceed with evidence-based culling, or whether the cluster approach would result in a return to perturbation. Details requiring further clarity are listed in response to Q9.

Q9. Please give reasons for your answers to this section (optional). [free text response]

Wildlife and Countryside Link does not support the badger cull, or the 'targeted badger intervention' policy. Please refer to our position statement at the start of this document.

The proposal does not sufficiently define or explain what constitutes a 'cluster', despite these being critical aspects of the proposed culling approach. For example, the proposal does not clarify:

- How large the culling areas around clusters will be;
- Whether landowners within clusters will be compelled to allow culling to take place on their land;
- What (if any) limits will be imposed on culling badgers within licensed clusters, regarding the proportion of badgers permitted to be targeted;
- What criteria will be used to determine when the disease situation and/or prevalence of the infection in badgers has been 'reduced significantly';
- What proportion of culled badgers would be tested for infection by APHA, and the methodology to be used for this;
- How many years licenses for culling in clusters could continue to be issued for;
- How potential ecological disruption resulting from badger culling within clusters will be evaluated and accounted for.

Without clearly defining these parameters, it is unclear how the 'targeted badger intervention' policy could proceed with evidence-based culling, nor whether the cluster approach would result in a return to perturbation.

The proposal document also states that the methodology to identify clusters "will be regularly reviewed and updated where appropriate in subsequent years" yet does not clarify how this review will be conducted.

The proposal document suggests that "Epidemiologists and veterinary science experts from the Bovine Tuberculosis Partnership ... could be available to support decision-making

processes by the UK Chief Veterinary Officer (CVO), through analysis of the available disease surveillance data.” It is essential that independent experts are consulted as part of the CVO’s decision-making processes under the targeted badger intervention policy, including those with expertise and experience in wildlife ecology, disease epidemiology, and animal welfare, to ensure that these processes are grounded in rigorous assessment of scientific evidence. Consultation of independent expertise should be included within:

- The CVO’s determination on which clusters are considered eligible for culling;
- The CVO’s annual assessment of disease in each cluster, and therefore whether culling should continue;
- The CVO’s determination of which methods of intervention are deemed to be ‘humane’.

Q10. To what extent do you agree or disagree there should be a separation of Natural England’s statutory conservation advice from licensing decisions?

e. Strongly disagree

Q11. Do you agree that the Secretary of State should assume the role of licensing authority for culling under a targeted badger intervention policy?

b. No

Q12. Please give reasons for your answers to this section (optional). [free text response]

The Secretary of State should not assume the role of licensing authority for culling. This role must sit with a scientific, independent expert body able to rigorously assess any evidence presented and to publish its decisions and its decision-making processes.

Q13. 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) [free text response]

No Wildlife and Countryside Link response to this question.

Q14. Do you have any other comments on the proposals for a targeted badger intervention policy? (optional) [free text response]

Wildlife and Countryside Link does not support the badger cull, or the 'targeted badger intervention' policy. Please refer to our position statement at the start of this document.

Licenses to kill a native protected species for disease control purposes should only be issued where there is unequivocal independent evidence for its efficacy, when there is no alternative method of disease control, when the method of killing is demonstrably humane, and when there is clear evidence for minimal ecological disruption or damage. The proposals fail to meet these basic criteria.

The policy raises significant animal welfare concerns. The consultation document states that the culling methods of cage trapping and shooting, and controlled shooting would continue to be used under the 'targeted badger intervention' policy. It also states that the Chief Veterinary Officer is satisfied these methods are effective and humane yet does not provide evidence or explanation to demonstrate how these conclusions have been reached. This is of particular concern given that the British Veterinary Association withdrew support for controlled shooting as part of the Badger Control Policy, stating that "the results from the first two years of culling have not demonstrated conclusively that controlled shooting can be carried out effectively and humanely based on the criteria that were set for the pilots."²

Indeed, a 2013 investigation by the Government's own Independent Expert Panel (IEP) found that controlled shooting could result in 7.4% - 22.8% of badgers taking over 5 minutes to die of blood loss and organ failure, thereby failing to meet the threshold of concern for humaneness.³ The IEP investigation concluded that a significant proportion of shot badgers were at risk of experiencing marked pain due to the controlled shooting method. Following the publication of the Panel's report in 2014, the Panel was disbanded and the level of oversight of controlled shooting events has reduced markedly, with 'humaneness' assessments relying on self-reporting by culling operatives that have proved to be unreliable when compared to data from monitored events. For example, Natural England data

² <https://www.bva.co.uk/news-and-blog/news-article/bva-calls-for-change-to-badger-culling-method-and-wider-roll-out-in-england/>

³ <https://assets.publishing.service.gov.uk/media/5a7ebd49ed915d74e33f21d5/independent-expert-panel-report.pdf>

published in April 2024 shows just 56 observations of controlled shooting events during 2023, the lowest proportion (0.31%) since culling started.⁴

Badger vaccination should immediately replace culling for any control of TB in badgers. Whilst this will not remove infected badgers from the countryside, vaccination is a humane intervention that will deliver a sustainable reduction in disease prevalence over time. Trapping and vaccination can be conducted by volunteers, at considerably cheaper cost than culling. Further clarity as to why TVR has not been proposed in this consultation would be welcome.

Whilst the consultation cites the intention to keep farmer-led cull costs and the administrative burden to a minimum, the consultation document does not set out a clear or comprehensive business case for the 'targeted badger intervention' policy, nor for alternative control measures. It also does not provide sufficient detail or explanation for any figures provided. For example, the £100 million figure stated in the consultation document is unclear, given that this figure appears unchanged since the Randomised Badger Control Trial final report in 2007. Further clarity is required.

Q15. Should animal level bTB risk information be published on ibTB?

a. Yes

Q16. Please give reasons for your answer (optional). [free text response]

BTB is ultimately a cattle disease, and therefore the availability of detailed information on which farmers can base livestock purchasing decisions, alongside strengthened cattle control measures and biosecurity, will be essential for effective disease control. For example, the Animal and Plant Health Agency's (APHA) year-end epidemiological reports for each cull county show that movements of undetected infected cattle remained the biggest driver for new incidents of bTB.⁵

⁴ <https://www.gov.uk/government/publications/bovine-tb-summary-of-badger-control-monitoring-during-2023>

<https://www.gov.uk/government/publications/bovine-tb-summary-of-supplementary-badger-control-monitoring-during-2023>

⁵ [Bovine TB: epidemiology reports, 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/bovine-tb-epidemiology-reports-2022)

The consistent identification and removal of infected cattle from herds, and the prevention of movement of undetected infected cattle, will be required to improve cattle measures and biosecurity. Publishing animal level bTB risk information on ibTB will help inform these measures, alongside compulsory risk-based trading restrictions.

Q17. To what extent do you agree or disagree it would be helpful to share information on where herd owners source their stock from?

a. Strongly agree

Q18. Please give reasons for your answer (optional). [free text response]

As discussed under Q17., bTB is a cattle-based disease, and as such strong cattle measures will be required for effective mitigation and control. Greater sharing of where herd owners source their stock will help inform these measures, including stricter controls on cattle movement, and supporting more effective risk-based trading.

The consultation document and proposals do not go far enough to consider measures to control bTB beyond badger culling. There remains no mention of improved mandatory cattle biosecurity and husbandry, or of any intention to implement more accurate cattle testing approaches. The poor sensitivity of the current SICCT test means that the number of infected cattle may be as much as 50% higher than recorded.⁶ This alone means that the baseline figures for cattle infection levels in England are considerably underestimated.

Far stronger cattle measures will be essential to sustainably manage bTB. This must include cattle vaccination, tighter biosecurity controls on farms, tighter controls on cattle movements, and the rollout of improved cattle testing. For example, rolling out higher standards of testing as used in Wales, accompanied with compensation for farmers when using more accurate cattle tests, would be a tried and tested improvement that is immediately available.

⁶ Enticott, G., 2012. Regulating animal health, gender and quality control: A study of veterinary surgeons in Great Britain. *Journal of Rural Studies*, 28(4): 559-567

Q19. Do you have any other comments? (optional) [free text response]

As stated, Government has provided no clear scientific evidence to prove that badger culling alone has significantly reduced bovine TB in cattle, in or around the cull zones. Government's proposal to allow further culling under the 'targeted badger intervention' policy is therefore highly concerning.

The consultation document draws inaccurate and uncritical conclusions from the Birch et al. 2024 study to provide justification for culling. For example, it states that the "latest statistical analysis [Birch et al. 2024] ... shows an average reduction of 56% in OTFW incidence by the end of the fourth year of badger culling", without acknowledging that the effect of culling cannot be isolated from other variables influencing bTB rates in this study, including a range of cattle measures. Furthermore, a 56% fall in herd incidence risk per herd year does not translate into the number of English cattle with bTB per annum, nor the proportion of the English herd with bTB per annum prematurely slaughtered. To clarify, this 56% figure does not mean that 56% fewer cattle have been impacted by bTB.

The Birch et al. study also does not attempt to compare culled with uncultured areas. The forward written by the Secretary of State explicitly states that "A major element of this success has been the industry-led cull of badgers". This claim is both inaccurate and misleading.

The Birch et al. paper itself states that this was "not a controlled experimental trial", and that "Similar effects [from reducing bTB transmission from badgers to cattle] may be achieved or maintained by other measures, such as badger vaccination, fertility control in badgers and biosecurity". Furthermore, the 56% average incidence reduction referenced in the paper applies to High-Risk Areas in England; these areas are subject to the most stringent cattle control measures. Yet the consultation document does not acknowledge this, nor do the proposals discuss any options for controlling bTB other than culling.

The consultation document also does not clearly state how any evidence will be used to determine the role of badgers in local disease outbreaks, or the need for culling badgers. The proposal does not explain how different factors – for example, high-risk cattle movements, the wildlife reservoir, contaminated machinery, the survival of pathogens in soil, the spreading of slurry and manure - will be assessed in determining the spread of infection. The proposal also does not sufficiently define or explain what constitutes a 'cluster', yet states that there will be no limit on how many clusters can be licensed for culling. It is unclear how the 'targeted badger intervention' policy could proceed as an evidence-based approach if such critical parameters are not clearly defined.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 83 organisations to use their joint voice for the protection of the natural world and animals. 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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The following organisations support this response:

- Badger Trust
- Born Free Foundation
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- League Against Cruel Sports
- National Trust
- People's Trust for Endangered Species (PTES).
- RSPB
- RSPCA
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