

Reasons for the current threat to badgers

- Bovine tuberculosis (bTB) in cattle is a serious problem although recently there has been a decline in incidence.
- Annual compensation to farmers cost tax payers about £63m in England in 2009
- Some people believe badgers are the sole cause of the problem. This is definitely not so although they are implicated.
- In the highest bTB areas, about 1 in 7 badgers may have TB. Most badgers are TB free
- Although badgers are protected by law, the Government can issue licences to kill them under particular circumstances

What is Government doing?

The Coalition Government has issued a consultation document (Bovine Tuberculosis: The Government's approach to tackling the disease and consultation on a badger control policy). This contains 6 options:

1. Continue to take no action on badgers.
2. Government to cull badgers at the taxpayers' expense.
3. Government to vaccinate badgers at the taxpayers' expense.
4. Government to license groups of farmers to cull badgers at the farmers' expense.
5. Government to encourage farmers or landowners to vaccinate badgers at the farmers' or landowners' expense.
6. Government to license groups of farmers or landowners to cull and/or vaccinate badgers at the farmers' or landowners' expense.

Government's preferred option is 6

Licensed farmers will have the choice of:

- Trapping badgers in cages and then shooting them **and/or**
- Shooting free-running badgers **or**
- Vaccinating badgers

Farmers will undoubtedly choose to shoot free running badgers as it is the cheapest method. However, there is a welfare issue here as some may not be killed outright and will suffer.

Will the Government fund adequate monitoring of farmers' actions?

It is very unlikely that this will happen at a level to do so properly and will be virtually impossible to monitor.

Why licensing farmers to kill badgers will not work

- Government spent £50m on a 10 year badger culling trial supervised by the Independent Scientific Group (ISG) which stated that: "**licensing farmers to cull badgers will risk increasing and spreading bTB in cattle**".
- Not all farmers will want to kill badgers to a specific timetable each year, keep it up for at least four years and bear the cost.
- Farmers will be unable to kill all of the badgers in the cull area as the animals are wary and easily frightened. Badgers not killed will become stressed and are likely to move around, perhaps taking bTB with them.

- The Government's own badger culling trial showed that there are profound negative impacts from culling. Although a sustained and co-ordinated 4-5 year cull led to modest falls in cattle TB in the core of the cull area, there was an increase in cattle TB on the periphery and culling led to an increase in the prevalence of TB in the local badger population. This is known as the perturbation effect.

The ISG finally concluded that: “**badger culling can make no meaningful contribution to the control of bTB**”.

What about elsewhere?

- No badgers have been killed in **Scotland** yet it is officially bTB free.
- Badgers have been culled in the **Republic of Ireland** but bTB remains a big problem. The intention is to replace culling with badger vaccination and cattle controls.
- In **Wales** the Welsh Assembly Government has issued a Consultation document on their proposal to cull badgers in Pembrokeshire and adjacent areas. The Consultation runs from 20th September to 17th December 2010.

What should be done?

The 2007 ISG report recommended that improved cattle controls would greatly reduce incidents of bTB. The TB advisory group and the TB eradication group also recommended increased cattle controls and improved testing.

- There are still thousands of overdue tests and no improvement in the testing regime. The Government may even be considering relaxing some of the regulations.
- Cattle husbandry and biosecurity (disease prevention measures) could still improve.
- Cattle herds are getting larger and many farmers keep cattle in close contact in large sheds for long periods increasing the risk of passing TB from cow to cow.
- All cattle controls still need to be rigorously enforced.
- EU Regulations should be altered so that cattle can be vaccinated against bTB.

Badgers should be vaccinated, not killed. This is the only sustainable long term solution to address the occurrence of TB in badgers.

The Government proposal seeks to placate those farmers who support a cull; yet it makes them bear the cost. It does not deal with the principal factors that perpetuate bTB in cattle:

- Inaccurate testing for bTB, leaving infected cattle in the herd.
- Moving cattle with undiagnosed bTB.

Other reasons for the slaughter of cattle

It is estimated that c. 300,000 dairy cattle over 2 years of age were prematurely culled in GB in 2008. The bulk died from causes other than bovine TB (eg mastitis, infertility, lameness etc.) (Defra Cattle Book 2008).

PLEASE HELP US PERSUADE THE GOVERNMENT NOT TO LICENSE THE KILLING OF BADGERS

How can you help?

- Read the consultation document at: <http://www.defra.gov.uk/corporate/consult/tb-control-measures/index.htm>
- Reply to its 8 questions (see **Response to Consultation document** below). This is the most important of the ways in which you can help.
- Write to your local MP at House of Commons, London SW1A 0AA and tell him/her of your views. You can find your MP at www.parliament.uk
- Write to your local newspaper and raise publicity about the futility of killing badgers as a means of combating bTB.

Response to Consultation document

- There are 8 questions.
- It is only Question 1 that requires comments.
- Questions 2 – 8 can be answered by simply replying either Yes or No but we recommend that you make a comment to at least one question.
- Obviously, you should and must express whatever views you have on the subject and are not bound to follow our position.
- Wherever a comment is entered it is extremely important to use your own words rather than repeating what is given here.
- ***However if you find responding to all 8 questions too daunting or time consuming, please simply reply to Question 1 of the Consultation stating whether or not you approve of the killing of badgers.***

Question 1 – Comments are invited on the options, costs and assumptions made in the Impact Assessment.

You may wish to answer this by saying in your own words either that:-

- you are against the unnecessary killing of all wildlife **or**
- the scientific evidence does not support the cull **or**
- killing badgers will not solve TB in cattle **or**
- it will make matters worse **or**
- the consultation document is too complex for the general public to understand **or**
- by making some of the above points or any others that occur to you, in your own words..

If you wish to expand your answer slightly, the perturbation issue could be mentioned. Culling has never previously been undertaken in the way suggested, therefore it is impossible to know whether it will replicate the results of the Randomised Badger Culling Trial (RBCT). There will be winners and losers and the negatives could outweigh the positives. Some farms in the core of the cull area may benefit whereas some outside and on the periphery will lose. Who will compensate them? The Government's preferred option 6 is not viable financially as it will cost more than it will save. The outcome cannot be measured and the cull cannot be effectively monitored. Why take such a huge risk when the use of vaccination is in sight?

If you have a depth of knowledge of the badger and its ecology, probably gained from many years' interest in the subject, you may wish to examine the document in detail. You will probably conclude that amongst other matters, the seven criteria for the licence to be issued present a major weakness. Question 1 provides an ideal opportunity to voice concerns on the criteria.

For Questions 2 – 8, you must answer either Yes or No to each question. You may make further comments in your own words. Please read the question and comments given below very carefully before answering.

Question 2 – Do you agree with the preferred option?

In the opinion of Badger Trust, the guidelines will not be followed and the preferred option is untenable.

Question 3 – Do you agree that this approach, of issuing licences to farmers/landowners, is the most appropriate way to operate a badger control policy?

It is the opinion of Badger Trust that this approach cannot be sustained or effectively monitored.

Question 4 – Do you agree with the proposed licensing criteria for culling and vaccination?

It follows from the comments already made that a cull is not supported by Badger Trust. It is impossible to fulfil the criteria and there is no feasible way in which this can be carried out in such a way as to prevent the spread of disease.

Question 5 – Do you agree that the proposed methods of culling are effective and humane?

Badger Trust cannot agree to this. It will be impossible to ensure a clean, humane kill with free shooting. Badgers will not stand still, they will run and will not present an easy target. Many may not be killed outright and will suffer needlessly before death. The safety of the general public is also a significant consideration as it will be impossible to guarantee their safety in and around the cull area.

Question 6 – Do you agree with the proposed use of vaccination, particularly its focus on mitigating the perturbation effects of culling?

Badger Trust is strongly opposed to this. The combination of vaccination and culling has not been demonstrated to be beneficial and is unlikely to mitigate the perturbation effects of culling. There is no evidence that it can negate the perturbation effect. Any culling causes perturbation, where badgers not killed will become stressed and are likely to move around, perhaps taking bTB with them.

Question 7 – Should anything further be done to encourage the use of vaccination?

It is the intention of Badger Trust to respond positively to this question. Vaccination on its own will be beneficial and has to be the sustainable option. The development of a badger vaccine to be orally delivered should remain a high priority.

Question 8 – Do you agree with the proposed monitoring?

Badger Trust considers that the proposed monitoring is clearly inadequate and cannot be expected to reveal inconsistencies or non-compliance with the licensing conditions. In most cases it is impossible to be sure how many badgers there are in a sett. We question how the welfare issues can be monitored, e.g. how can the humane killing of badgers be ensured?

Responses which must arrive by 8th December 2010 can be sent by any of the following options:-

- By post to TBBC mailbox, c/o Nobel House, 17 Smith Square, London, SW1P 3JR (A pro-forma of the questions can be down-loaded from the Badger Trust website www.badgertrust.org.uk)
- E-mail tbbc@defra.gsi.gov.uk
- Fax 0207 238 6431

Do make it clear that you are responding to the Consultation and keep a copy of your response.



Badger Trust is the only charity solely dedicated to the conservation of badgers throughout the UK.

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