

Wild Animal Welfare Committee

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Bovine TB Programme
Defra
Nobel House
17 Smith Square
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By e-mail

Dear Sir/Madam

Bovine TB: consultation on proposals to introduce licensed badger control to prevent the spread of bovine tuberculosis in the Low Risk Area (England).

A consultation exercise contributing to the delivery of the government's strategy for achieving Officially Bovine Tuberculosis Free (OTF) status for England, February 2018

We wish to respond to the above consultation.

The Wild Animal Welfare Committee (WAWC) is a charity set up in September 2014 to provide independent advice and evidence about the welfare of free-living wild animals in the UK, aiming to reduce harm to wild animals and prevent suffering caused by human activity.

The WAWC offers informed independent comment based on scientific research and modern understanding of animal welfare and animal sentience, with a view to influencing public policy, so that wild animal welfare is optimised.

WAWC is opposed to the current policy of killing badgers for the purposes of disease control in cattle, on both scientific and ethical grounds. We believe the badger culling programme is ineffective and cannot be carried out humanely. The application of badger culling in Englandⁱ does not follow international ethical principles for wildlife controlⁱⁱ, nor general principles for the effective killing of animals for disease control purposesⁱⁱⁱ. In the absence of a demonstrable reduction in the prevalence of bovine tuberculosis (bTB) in cattle that can be unequivocally attributed to licensed badger killing, no further 'badger control areas' should be licensed or extensions given to those licences already in place.

We welcome the announcement of a review of the bTB strategy by Professor Sir Charles Godfray. However, not to include badger culling (Natural England licensed killing) in the scope of this review, and indeed to expand badger killing whilst the review is taking place, does not make sense. If badger killing is to continue it needs to be considered as part of the overall bTB strategy, as it does not sit independently in terms of effects on the epidemiology of this disease or the economics of its control. It is not possible for the objectives of the review to be achieved without including consideration of badger killing. Whilst the review is taking place there should be a moratorium on badger killing.

We believe that the question of badger control specifically in the Low Risk Area (LRA) cannot be properly answered in the narrow confines of the suggested on-line consultation response system and for this reason we are responding by letter.

In response to the consultation we offer the following:

The consultation document states: *It is vital that we are able to deal swiftly and decisively with any incursion of TB in the LRA which involves both cattle and badgers to make sure that the special status of this area is protected, to support the sustainability of local farm businesses and to disrupt the disease transmission within the badger population.* Notwithstanding our position on management of the risk rather than elimination of the hazard, we agree with that statement. We would ask however, given the Strategy was published in 2013 and included an express intention to achieve OTF status in the LRA, why has it taken so long to acknowledge the risk of spread to the LRA and to make proposals to address it?

The consultation asks for views on a number of points. We address these in turn as numbered in the consultation document:

6 (a): The principle of controlling the risk from badgers with TB in the LRA.

WAWC agrees, in principle, with the imperative to preserve the size and status of the low risk area (LRA) and the principle of controlling the risk from badgers with bTB in the LRA should there be any. However, there are a number of areas where WAWC does not agree with the rationale and where WAWC does not agree with the proposals to address the problem.

The first principle of controlling disease risks associated with badgers in the LRA should be to prevent the disease from spreading from cattle to badgers. This should include enhanced cattle testing and removal of reactors, and strict biosecurity. Other OTF countries across Europe where the badger is native, including Scotland, are able to maintain OTF status without killing badgers.

We agree that, if the disease is allowed to move from cattle to badgers in the LRA, the presence of infected badgers in the area could lead to the development of new areas in the LRA where bTB becomes endemic in the local cattle and badger populations. However, without an understanding of how, and when, badgers become infected in the LRA, a policy that sets out to kill badgers is unfounded and unwarranted. Given that badger populations are largely stable and therefore sedentary, while cattle are moved around the country frequently

in large numbers, it is reasonable to assume that new pockets of infection in cattle in previously bTB-free areas arise from cattle movements. Although there has been a restriction of cattle movements into the LRA, this restriction is insufficient given the force of infection (the rate at which susceptible individuals acquire an infectious disease) in the HRA.

Both before and after the introduction of pre- and post-movement testing, there have been instances where cattle recently moved from the HRA to the LRA have been disclosed as infected. Appropriate measures such as movement controls and rigorous testing and removal of reactors appear to have prevented the infection becoming established in cattle (and presumably wildlife). Where cattle measures have been effective, the mere presence of badgers in the vicinity of the affected herd should not be used as a trigger to kill them.

Citing the affected area of Sussex as an example of an incursion of bTB into a previously free area when the organism has been circulating in cattle and badgers in the area for at least 40 years is a poor example and simply serves to confuse. The area of Sussex affected by the strain of bTB involved is quite small and, in comparison with some badly affected such as the West Country and the Midlands, there has been little geographical spread.

6 (b): The principle of a government-led badger control operation where required.

It is difficult to determine what this means. We assume that this would be similar to the approach in the HRA and Edge areas. However, the governance and conduct of these privately-funded and privately-conducted killing exercises is shrouded in secrecy and in the absence of any meaningful information about how the task is conducted elsewhere, WAWC is unable to make substantive comment. Notwithstanding this, we believe that killing badgers in the LRA should be a truly exceptional consideration. Properly conducted cattle testing and associated biosecurity measures should be sufficient to prevent disease spread from cattle to wildlife. The population densities of badgers in the LRA are considerably lower than in the HRA so the epidemiology of the disease is different. If the case for killing badgers in the LRA is made (and the standard of proof should be very high), we believe it must be planned and implemented by Government. There is no place for such exceptional disease control measures to be delegated to landowners

6 (c): The principle of taking a precautionary case-by-case approach, dependent on the local conditions and situation, including as regards the number of years in which culling is carried out.

WAWC agrees that a case-by-case approach should be taken but we are unclear what is meant by 'precautionary' in this context:

1. WAWC remains opposed to the killing of badgers for disease control because the evidence base does not support it. However, if such means are to be deployed in a 'precautionary' approach, commencing killing badgers in the LRA without an exit strategy and a criterion for success linked

to the prevalence of the disease in cattle rather than the remaining population of badgers is unscientific and unethical. The wording of the consultation in respect of badger killing is perhaps deliberately vague so as to provide maximum flexibility but it will be important to deploy over the smallest area necessary and for a limited time (but see point 4 below).

2. It is unclear how Defra will determine how badgers in the LRA are infected. Although surveillance in the LRA includes wildlife surveillance around OTFW (Officially bTB-free status withdrawn) incidents of obscure origin, it is not clear whether this involves collection of road-killed wildlife or other found-dead animals over and above that collected by the routine Animal and Plant Health Agency organised scanning surveillance of wildlife that takes place across Great Britain. If the 'precautionary' approach involves active efforts to collect evidence about badger bTB prevalence by killing badgers prior to an organised effort to kill greater numbers, Defra must consult on the means and methodology.
3. A 'precautionary' approach must also be applied to cattle incidents, particularly where the origin of the herd incident is both unexplained and the incident involves a high proportion of the herd. At the very least the cut-off point on the interpretation of the SICTT (single intradermal comparative tuberculin test) should be at the severe end and ignore the avian readings. Combining this with interferon-gamma blood testing is also important. In many cases, complete and prompt herd slaughter will be warranted. Prompt, rigorous testing of other cattle herds at risk must be employed.
4. It is unclear how large the area selected for badger killing will be. Given that the Randomised Badger Culling Trial (RBCT) showed that small scale killing in response to an outbreak in cattle (the so-called 'reactive cull') was likely to *increase* the number of herd incidents, it is concerning that the methodology proposed here insofar as can be determined is very similar to that discredited by the RBCT^{iv}. However, a large area along the lines of that used in the HRA in response to a single or small number of herd incidents would be out of proportion to the risk.

6 (d): The principle of using culling or vaccination or a combination of the two to control risks from badgers with TB in the LRA.

WAWC is an advocate of badger vaccination but accepts that large scale campaigns are slow. However, vaccination over an area of sufficient size including the affected and surrounding farmland ought to be considered as a default since this would help limit the social perturbation effect inherent with small scale killing of badgers.

6 (e). In relation to cases where culling is deployed, the principle of lowering the badger population of the affected area sufficiently to reduce the risk of infection of cattle from badgers (whether through direct or indirect contact), and ideally substantially reduce or even eliminate it.

This is incompatible with (d) as this allows for vaccination. If one is lowering the population so as to reduce or eliminate the infection in badgers, it is very

likely that all of the badgers in a given area will need to be killed thereby rendering the notion of vaccination redundant. WAWC opposes this approach.

6 (f): On the proposed revisions to the Guidance to Natural England on licensed badger control

All WAWC comments included in 6 a-e are pertinent.

Paragraph 19e states that 'All land holders must permit Natural England access to their land for compliance monitoring.' It needs to be made clear whether this includes land where the occupier has not agreed to killing badgers.

6 (g): Any additional comments or approaches which you feel are relevant but not captured by the questions above.

None.

In summary, WAWC is opposed, in principle to the killing of badgers for disease control purposes. However, WAWC agrees with Defra that it is vital that any incursion of bTB in the LRA is dealt with swiftly and decisively. Such interventions should be cattle focused with prompt and rigorous testing and movement controls, herd slaughter and strict biosecurity measures. Where there is strong evidence that bTB has spread into local wildlife then WAWC believes that vaccination of badgers offers a suitable intervention to protect both cattle and wildlife. This would form part of an alternative approach that seeks to manage the disease risks rather than a dogmatic objective of the elimination of the hazard.

Yours sincerely



Dr P.J.Goddard, Chairman

On behalf of WAWC

ⁱ Munro, R (2014) Pilot Badger Culls in Somerset and Gloucestershire. London: Report by the Independent Expert Panel.

ⁱⁱ Dubois, S., et al. (2017) International consensus principles for ethical wildlife control, *Conservation Biology*, doi 10.1111/cobi.12896.

ⁱⁱⁱ World Organization for Animal Health (OIE) Terrestrial Animal Health Code 2017, Article 7.6.1 General principles, 6. Killing of Animals for Disease Control Purposes. Available at: http://www.oie.int/index.php?id=169&L=0&htmfile=chapitre_aw_killing.htm

^{iv} Bourne FJ, Donnelly CA, Cox DR, Gettinby G, McInerney J, Morrison I, Woodroffe R (2007) *Bovine TB: the scientific evidence. Final report of the independent scientific group on cattle TB*. London, UK: Defra.