

Submitted to Bovine TB: Consultation on proposals to evolve badger control policy and introduce additional cattle measures
Submitted on 2024-05-13 11:59:57

Introduction

1 Would you like your response to be confidential?

No

If you answered Yes to this question, please give your reason.:

2 What is your name?

Name:
Jenny Pike

3 What is your email address?

Email:
devonbadgergroup@gmail.com

4 What is your organisation?

Organisation:
Devon Badger Group

Proposal 1: To introduce a targeted badger intervention policy

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

Strongly disagree

6 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?

I don't know/I don't have enough information

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

I don't know/I don't have enough information

8 What other factors should be taken into consideration in defining a cluster under the targeted badger intervention policy? (optional)

What other factors should be taken into consideration in defining a cluster under the targeted badger intervention policy? (optional) :

The proposal set out in the consultation does not seem to take into account any other factors that could affect the level of bTB in any cattle population, for and the, the unreliability of the current SICCT test, potentially leaving residual levels of bTB in cattle herds to reinfect other and the biosecurity measures implemented on farms, or lack of them and the lack of any testing of the prevalence of TB in any wild animal populations including badgers. To focus on one questionable measure while ignoring other potentially more effective control measures would not only be counterproductive, risk causing local badger extinctions but would also be a huge waste of taxpayers money.

9 Please give reasons for your answers to this section (optional).

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We were unable to answer questions 6 and 7 as the consultation document does not give enough detail i.e. it does not explain how the government will determine how "badgers are part of the problem," how many badgers will need to be culled in each cluster and how a cluster is defined.

The consultation does not provide any information on how long culls will continue as stated they will continue for "as long as necessary, led by the evidence" and "until the prevalence of infection in badgers has been reduced significantly" but again there is no information on how this will be determined.

This is fundamental information that needs to be provided for respondents to this consultation to provide fully considered answers.

Proposal 2: Licence and associated conditions for badger culling under a targeted badger intervention policy

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

Strongly disagree

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

No

12 Please give reasons for your answers to this section (optional).

Please give reasons for your answers to this section (optional):

Natural England's role is to provide guidance to governments on protecting and enhancing our natural world, it is therefore difficult to see how removing them from any licensing decisions is going to enhance the natural environment, it will only benefit those that want to damage and deplete it by making it easier to gain licenses. This risks causing local badger populations extinctions thereby potentially affecting wider biodiversity and whole ecosystems by removing a key species.

13 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)

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):

Again, there is not enough information to be able to give a fully considered answer, i.e. how will the CVO determine "the level of disease and the role of badgers must be such that it has been deemed by the UK CVO the culling is warranted?"

The licence holder has to satisfy DEFRA that it can carry out a licensed cull as safely and humanely as possible but as we saw from the initial Humaneness Monitoring carried out in 2013-2014, that 22.8% of free-shot badgers took more than 5 minutes to die thus failing the government's own humaneness test. This has subsequently been removed after this first year and free-shooting is still a licensed method of culling badgers.

We have seen from the government's annual Badger Control Operations figures that minimum targets are not being met in some areas as badger populations are becoming severely depleted. This would show that accurate badger population figures are not available and therefore local population extinctions cannot be ruled out, however, Defra 'aim' to ensure that badger culling will "not be detrimental to the survival of the population concerned" does not go far enough in protecting this important species.

14 Do you have any other comments on the proposals for a targeted badger intervention policy? (optional)

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The proposals set out in the consultation document appear to be based on the Downs et al., (2019) study which showed a statistically significant decrease in bTB in Gloucestershire and Somerset in the years between 2013 and 2017. However, if the data had included 2018, it would have shown an increase of 130% in Gloucestershire as explained by McGill and Jones (2019).

This selective use of data is misleading to the public and also does not take into account any other control measures introduced during the last 11 years including farm biosecurity, enhanced cattle testing methods and badger vaccination.

There was a further paper released in 2024 by Birch et al., (2024) which showed a change in the herd incidence rate per herd year from 0.145 incidents per year to 0.065 incidents per year within the 52 HRA over a period of four years. However, the authors acknowledged that, due to other measures introduced during the same period, it is not possible to single out badger culling from the other cattle-based measures implemented.

Even the Downs et al., (2019) authors highlighted that the specific causes for the decline in bTB identified in their study were unclear and could have been attributed to improved farm biosecurity and other measures.

Proposal 3: Support cattle purchasers by publishing bTB risk information on ibTB

15 Should animal level bTB risk information be published on ibTB?

Yes

16 Please give reasons for your answer (optional).

Please give reasons for your answer (optional):

We, as the Devon Badger Group, would welcome this measure, if introduced, as it would provide valuable information allowing farmers to properly assess the risk when purchasing cattle from outside sources.

Buying in cattle from external sources will always carry some risk and farmers need to be able to make informed choices based on this risk.

Information gathered from the Defra 2019 Farming Practices Survey of those farmers who had bought cattle in the last 12 months found 26% of purchasing farms in England did not know the date of the source farm's last routine test and 33% did not know the source farm's TB risk area.

In addition, 18% did not know the date of the pre-movement test. Given the inaccuracy of the current SICCT test and the risk of infected cattle remaining undetected in the herd, this information is likely to have a significant effect on the level of bTB in any herd making the government's continual focus on badger control difficult to understand.

Proposal 4: Support responsible cattle movements by publishing bTB risk information on 'supplier' herds on the ibTB mapping application

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

Strongly agree

18 Please give reasons for your answer (optional).

Please give reasons for your answer (optional):

As mentioned above, farmers need vital risk data to be able to limit the risk if introducing bTB to their herds and the most effective method of sharing this data is on the existing ibTB mapping application.

We can see by the level of cattle movements how bTB is remaining such a big problem for farmers when between 2001 and 2015 158 million individual animal movements took place, 35% taking place at markets and showgrounds.

Farms have been known to purchase cattle from over 60 different sellers in one day from a cattle market.

This information, if available on the ibTB site could enable farmers to make informed judgements when purchasing in animals as approximately 80% of livestock movements are bought by just 20% of farm holdings and currently these farm holdings have no assurance that the farm they are trading with is not a potential source of disease.

Additional comments

19 Do you have any other comments? (optional)

Do you have any other comments? (optional):

As mentioned in previous answers, this consultation lacks the necessary information to enable properly considered answers.

There is a lack of detail on what evidence is needed for licenses to be issued for lethal badger control, no business case has been provided on alternatives to badger culling such as badger vaccination, cattle vaccination and enhanced biosecurity measures or cattle testing.

The government continues to focus on badger control without giving due consideration to the alternatives. There is also little regard for protecting badger populations from becoming extinct in some areas as population densities will be determined by cull contractors.

The wording of the consultation does not give the respondents an opportunity to comment on alternative disease control measures which are likely to deliver more direct benefits to farmers than the current focus on badger culling.

The use of the Downs et al., (2019) and Birch et al., (2024) references without including the authors, cautionary notes on asserting the role of badger culling in their conclusions is misleading to the respondents and leads them to agree with the proposals set out in the consultation.

Consultee Feedback on the Online Survey

20 Overall, how satisfied are you with our online consultation tool? Please give us any comments you have on the tool, including suggestions on how we could improve it.

Neither satisfied nor dissatisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it. :

The consultation tool itself is adequate but it is the consultation questions themselves which are wholly inadequate in providing the information needed to answer the questions in an informed way.