

BVA Northern Ireland Branch response to Consultation on Potential Wildlife Intervention Options as part of the Bovine Tuberculosis in Northern Ireland: Blueprint for Eradication

Question 1

Are there any comments on equality or disability issues you wish to raise?

Yes	☒	No	☐	Unsure	☐
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Comments

As noted by the Department of Agriculture, Environment and Rural Affairs ('the Department'), this policy proposal aims to eradicate bovine tuberculosis (bTB) – a disease that poses a risk to all rural parts of Northern Ireland. We expect the policies to be applied equally to all areas where the disease occurs and the Department to involve all stakeholders with a relevant interest in eradicating bTB.

We therefore do not anticipate any equality or disability issues to arise as a result of this policy. However, implementation should ensure that all stakeholders have equal access to advice, support, training and financial assistance where new disease control measures are introduced.

Question 2

Are there any comments on the social and economic needs of persons in rural areas that you wish to raise?

Yes	☒	No	☐	Unsure	☐
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Comments

The Department's Rural Needs Assessment (RNA) sets out both the costs of bTB prevalence in Northern Ireland and the expected benefits of bTB eradication. We welcome its recognition of the importance of the international trade in bovines and their products for the Northern Irish economy (valued around £3 billion), and the potential barrier to trade and international market access caused by bTB.

The RNA also rightly highlights the financial, emotional and psychological distress inflicted upon farmers and their families by bTB. Stress and anxiety among farmers are especially high during periods of herd breakdowns and livestock culling but also last well beyond that. The increased workload and uncertainty caused by testing; the perceived stigma particularly experienced by those who breed and show pedigree animals; and the pervasive blame culture that accompany herd breakdowns are all examples of the enduring strain placed on farmers by bTB.

Moreover, while farmers are compensated by the Government for infected livestock that are culled, as noted in Annex VIII, compensation does not cover the full range of direct and indirect costs associated with a herd breakdown. Compulsory culling of productive animals, loss of genetic merit or pedigree value, reduced milk production, additional handling and isolation requirements, cleansing and disinfection costs, and herd movement restrictions can all create significant financial pressures for affected farm businesses (Andersons Centre, 2026). We explore the costs of bTB for farmers in more detail in Question 9.

There are also effects on the wellbeing of vets who work closely with affected animals and their keepers. Additionally, bTB may affect vets' commitment to their profession and there is also a risk of physical injury for vets and others involved in bTB testing. As with farmers, understanding how vets manage with the stresses of bTB control is important for the continued management of the disease and provision of veterinary services.

While the benefits of bTB eradication are immense, the Department is right to note that there will be short to medium term costs resulting from this policy proposal. Any measures introduced should minimise unnecessary disruption, be proportionate, and be accompanied by practical veterinary support and clear communication.

Whilst not underestimating the impact of bTB on livestock vets and farmers, any control measure should also consider other local and national stakeholders, such as those concerned with the environment, wildlife and free-ranging animal welfare – this includes veterinary professionals. Badger control measures introduced into local communities can be extremely controversial and damaging if not carried out in the right way, for the right reasons and with clarity of explanation.

Question 3

Are there any comments that you wish to raise regarding the HRA Report?

Yes	☒	No	☐	Unsure	☐
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Comments

We welcome the thorough Habitats Regulation Assessment (HRA) and its conclusions that the impacts of all the proposed measures will not result in a Likely Significant Effect on the sites included.

The ethical and proper execution of the wildlife intervention strategies included in this proposal will however be vital in limiting the impact on the wildlife and environment in Northern Ireland's rural areas. It is also likely that the impacts of badger removal will vary between sites and be impacted by the delivery, success, or otherwise, of the control measures used at those sites. Continued ecological monitoring must accompany any wildlife intervention programme to ensure protected habitats and non-target species are not adversely affected.

It is important to note that the word 'wildlife' is used extensively throughout all the documents in this consultation to refer to badger specific interventions. If interventions were extended to wildlife species other than badgers the outcomes would potentially be very different. Our comments on methods of control throughout this response relate specifically to badgers and should not be assumed to cover other wildlife species.

Question 4

Are there any comments that you wish to raise regarding the SEA Report?

Yes	☐	No	☒	Unsure	☐
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Comments

The SEA report is largely outside our areas of expertise but appears to be a thorough consideration of the issues involved. Ongoing environmental monitoring should continue throughout implementation so that any unintended consequences can be identified early and management strategies adjusted accordingly.

Question 5

Do you agree with the Department that a wildlife intervention is necessary in Northern Ireland?

Yes	☒	No	☐	Unsure	☐
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Comments

Based on DAERA's scientific evidence review of the contribution of wildlife, specifically badgers (*Meles meles*), in maintaining bTB transmission in Northern Ireland, we support appropriate wildlife interventions, specifically badger controls, as a component of a wider and holistic bTB eradication strategy.

A clear requirement for badger interventions in each geographical area must be evidenced and the method(s) chosen for that area appropriate. Interventions must be targeted, evidence-based and carried out in a humane manner such that the pain and suffering experienced by badgers and wildlife more broadly is minimised. This is especially the case if lethal methods of control are to be considered. Monitoring of any control method selected is also essential. We explain our views on to the extent to which each intervention option achieves this later in our consultation response. Any wildlife management interventions, including those for badgers, should follow the Principles for Ethical Wildlife Management described by Dubois and others (2017).

It is evident from the sustained high levels of herd bTB incidence of around 10% in Northern Ireland that relying on cattle measures alone is unlikely to be a sustainable approach towards achieving bTB eradication. It is well documented that wild badgers can act as reservoir hosts for bTB, creating opportunities for transmission from infected badgers to cattle via direct contact (nose to nose) or indirect contact (eg cattle feed contaminated by infected badger excretions, including around badger latrine areas). Measures are needed to control the transmission of bTB between the two species in both directions; badgers to cattle and cattle to badgers.

Central to the prevention and management of any infection is good biosecurity. In order to improve biosecurity on the ground, policies, innovations, and best practices, must be implemented on-farm. On-farm biosecurity measures to exclude badgers from farm buildings and access to the cattle's feed and water can greatly limit the potential for contact and disease transmission between badgers and cattle. Basic measures such as: making feed stores badger-proof, preventing badger access to buildings, and raising cattle feed and water troughs and mineral licks, must be in place.

Methods of exclusion include:

- Solid metal sheeted gates;
- Metal sheeting on rail fences;
- Retractable electric fencing – badgers are less likely to visit unfenced facilities on farms that use electric fencing around feed stores thanks to the 'deterrent effect';

- Metal feed bins;
- Rail gate with adjustable galvanised metal panels;
- Wildlife cameras can also be used to track badger activity and identify any weak spots.

Such measures must be adopted alongside any other methods of badger control. To prevent a focus on wildlife interventions leading to any potential backsliding in biosecurity measures, we recommend that licences to cull badgers only be issued if the respective farmers are able to demonstrate continued appropriate implementation of biosecurity best practice.

In this same token, any wildlife intervention strategies adopted in this policy must be carried out in conjunction with – not in place of – cattle control measures. Research indicates that the majority of bTB transmission is within species, both cattle to cattle and badger to badger. Transmission within the cattle population is therefore just as important for spreading bTB as is transmission within the badger population. For example, one of the greatest threats to the health status of an established herd is through contact with cattle from outside of the herd. This is likely exacerbated by the high cattle density in Northern Ireland as well as shared and short-term grazing practices that are more common in Northern Ireland. In the context of bTB control, improving biosecurity, beyond badger exclusion methods, involves stopping infected cattle entering the herd and reducing the bTB risk from neighbouring cattle herds.

Other cattle control measures that must form part of any bTB eradication strategy include but are not limited to:

- Properly storing slurry for more than six months and ensuring the full composting of solid manure before use (note: we acknowledge this might be considered difficult for many farms in Northern Ireland but we nonetheless believe that this should be fully considered and practical solutions developed to assist farmers in ensuring non-composted manure is not spread on land. This poses a risk of infection to both cattle and wildlife);
- Movement restrictions on herds that have tested positive and close monitoring of animals moved off-farm shortly after receiving Official bTB Free (OTF) status;
- Maintaining rigorous slaughterhouse surveillance
- The development of a cattle vaccine and DIVA test (a test that can differentiate between infected and vaccinated cattle) could also play an important role in any long-term bTB eradication policy.

Notwithstanding the need for wildlife intervention, farmers, vets and others need to change their actions and choices to improve the implementation of biosecurity measures. Policy needs to enable this by better reflecting the findings of research in order to empower farmers. Three components are needed for a shift to a more behaviour-centred approach, all of which are underpinned by the involvement of the veterinary profession:

- The best advice from trusted and well-informed sources;
- Reliable and accessible local data;
- Positive messaging that rewards best practice, including a compensation regime that

incentivises behaviour change.

Therefore, alongside any wildlife intervention programmes chosen by the Department, influencing the actions of farmers must be considered as an integral part of any programme to limit the spread of infection. To reiterate, licences to cull badgers should not be issued until the respective farmers can demonstrate appropriate implementation of biosecurity best practice and risk-based trading as part of a wider earned recognition programme. More needs to be done to understand the barriers and incentives impacting on farmer behaviour.

Question 6

Based on the scientific evidence that has been provided in Annexes V to VII is there any additional scientific evidence the Department should also consider?

Yes	☒	No	☐	Unsure	☐
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Comments

The evidence provided in Annexes V to VII largely capture the current scientific context. However, there is a constant need for research into bTB eradication measures and their impacts so that the Department can continue to curb transmission and bolster disease resilience. This will be imperative for fulfilling the Department's objectives of reducing bTB herd incidence by 2% by 2030; 50% by 2040; and achieving eradication by 2050. Similarly, the Department should continually monitor science and outcomes in other countries so that policy remains evidence-led and capable of adapting should new science emerge.

Significant evidence gaps however remain, especially around the impact of badger vaccination on bTB incidence in cattle in a variety of situations and over medium to long periods of time. More evidence in particular is needed on a Test and Vaccinate or Remove (TVR) approach and Annex VII concedes that DAERA's previous TVR study "was not designed to provide evidence of a statistically significant effect of the TVR approach on badger or cattle bTB levels", and that "there is currently limited information about the effectiveness of TVR in badgers". We therefore call for more work to be done in this area, particularly as vaccination is often cited as the long-term goal of this bTB eradication strategy, and TVR is one possible way of deploying vaccination.

Beyond TVR, BVA's [policy position on the control and eradication of bovine TB](#) identifies the following areas where additional research or evidence would be beneficial:

- Improving the available test for bTB in cattle (and badgers);
- Monitoring the development and validation of a cattle vaccine and DIVA test, and adopting as quickly as scientific advances and European Union legislation allow;
- Better understanding of the effects of badger vaccination on the incidence of bTB in cattle;
- Evidence to establish the role of cattle faeces in the transmission of bTB;
- Better understanding of the causes of repeat breakdowns;
- Estimate of the true costs of bTB breakdowns to farms.

Question 7

Do you agree with the rating and scoring applied in the options analysis set out at annex VIII?

Yes	☒	No	☐	Unsure	☐
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Comments

The rating and scoring outlined in the options analysis of Annex VIII seem broadly sensible and provide an evidence-based approach to comparing the epidemiological, welfare, environmental, social and economic impacts of each wildlife intervention option. We appreciate that such analysis is useful and important for decision-making and provides an overview of what are complex factors and difficult decisions.

While we recognise the value of a structured options appraisal, we caution that reducing an issue as complex and contested as bTB to single numerical score risks overstating the certainty of the analysis. We encourage decision-makers to consider the qualitative evidence underpinning the scores alongside the overall rankings. We also caution that the assumptions will vary with the quality of that evidence, the area in which the control measures are deployed and the efficiency of deployment and other controls in that area (biosecurity and cattle controls). The underlying assumptions, evidence-base and weighting of criteria must also remain transparent, open to scrutiny and regular review.

Question 8

Do you agree that any wildlife intervention option selected should be delivered by the private sector, with the Department's role limited to oversight, regulation and monitoring?

Yes	☒	No	☐	Unsure	☐
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Comments

It is reasonable that bTB wildlife intervention programmes be carried out by the private sector, as is the case in the Republic of Ireland, other parts of the United Kingdom and elsewhere in the world. Delivery through the private sector can provide cost savings and is generally more suitable for seasonal work than public sector employment. The private sector route also offers the opportunity to involve farmers with local knowledge and a vested interest and give them more ownership of disease control efforts. All farmers and private companies involved must have the appropriate qualifications required to carry out their work.

Proper monitoring and oversight by the Department will be imperative. The Department must:

- Enforce strict licensing procedures;
- Establish and enforce clear ecological and animal welfare standards;
- Ensure training of any operatives is of a high standard and monitored;
- Undertake quality assurance and ensure activities are carried out in accordance with agreed protocols;
- Carry out independent auditing;
- Maintain robust and transparent reporting mechanisms;
- Collect, analyse and publish data to assess the effectiveness of wildlife intervention programmes
- Be prepared to change or adapt policy based upon the findings of any review.

Independent veterinary oversight should also be maintained where appropriate, particularly where interventions involve acts of veterinary surgery, the use of prescription-only medicines, or animal health and welfare decisions. Vets play a central role in bTB control as scientists, animal welfare advocates and trusted advisers to both farmers and wildlife groups, and their expertise should continue to inform the planning, delivery and evaluation of wildlife intervention programmes.

Question 9

Do you agree that any wildlife intervention option selected should be funded by the private sector, with the Department funding oversight, regulation and Monitoring?

Yes	☐	No	☒	Unsure	☐
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Comments

bTB is a statutory disease in Northern Ireland and there is a shared responsibility between Government and industry to work towards eradication. While we are in favour of fair cost-sharing, it would be unreasonable to expect the private sector to bear the full cost of any wildlife intervention programme, particularly where the intervention selected has high operational costs (for example, TVR).

The Department's own analysis acknowledges that farmers already incur substantial direct and indirect costs associated with bTB through testing, movement restrictions, reduced animal values and the loss of income after culling while waiting for new offspring to become productive. Annex VIII states that compliance costs for farmers are estimated to total £20 million for the 2026-2027 financial year, with knock-on costs adding a further £13 million. Other reports commissioned by the livestock industry suggest the indirect costs of bTB for farmers to be much higher in the region of £96 million per year (Andersons Centre 2026).

We support a fair and transparent cost-sharing approach developed in partnership with industry. However, where Government determines the design and implementation of a statutory eradication programme, it should also make an appropriate financial contribution to ensure that chosen interventions are practical, sustainable and consistently implemented.

Indeed, funding arrangements should reflect the shared responsibilities and benefits of effective bTB control. bTB eradication in Northern Ireland would deliver substantial public as well as private sector benefits, including improved animal health and welfare; enhanced biodiversity; protection of agricultural productivity and trade; and reduced public expenditure on compensation. The last point is particularly notable, since the Department's statistics indicate that in the 2025-2026 financial year around 80% (£54 million) of the £70 million spent by the Department on its bTB programme was made up of compensation paid to farmers.

Annex VIII states that each herd breakdown that is avoided saves the Northern Irish economy around £27,500. Annex VIII also rightly notes that public expenditure on the disease will grow rapidly unless new action is taken. Public sector investment in effective eradication measures should therefore be viewed as a long-term investment that has the potential to lower future expenditure by preventing costly herd breakdowns and reducing compensation payments.

Question 10

Considering all the relevant factors above would you support the controlled shooting of free-roaming badgers as a potential Wildlife Intervention approach?

Yes	☒	No	☐	Unsure	☐
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Comments

Available evidence shows that proactive badger culling can result in significant reductions in incidence of bTB in cattle and function as a component of a wider and holistic bTB eradication strategy. How this is carried out matters. All wildlife – in this case badger specific – intervention options must be targeted, evidence-based and carried out in a humane manner such that the pain and suffering experienced by badgers and wildlife more broadly are minimised. This is especially the case where lethal interventions are used.

Licences to cull badgers should only be issued where there is clear evidence of badger involvement in the epidemiology of the disease in a given area (for example through badger RTC surveys and DNA profiles of *M. bovis* infections in cattle and badgers in a given area). Animal welfare must remain paramount in any decision-making process. Any lethal methods should not be supported as the primary intervention method to achieve the end goal; support for vaccination alongside the focus on biosecurity and development of reliable and accurate testing in cattle populations should remain the focus for bTB management.

Controlled shooting of free-roaming badgers was the prominent intervention method selected in England. If carried out properly, it can be an effective way to cull badgers that has the benefits of an instantaneous kill, without putting the animal through the distress of being trapped by cages or stopped restraints. Free-roam shooting must demonstrate sufficient training, marksmanship standards, equipment, operating distances and follow-up procedures and be independently monitored.

As noted by the Department, controlled shooting comes with humaneness challenges due to the difficulty of ensuring an immediate, clean kill in badgers. Some areas, for example with high human population densities or with difficult terrain, may not be suitable for controlled shooting at all and supplemental live capture should be considered as part of a wider integrated eradication programme. Even in areas that are suitable, poor visibility, badger behaviour and inaccurate shot placement (exacerbated by insufficient training) can prevent consistent outcomes. Welfare concerns are increased by the ecology of badgers as burrowing animals that will retreat to dense cover or into setts, often with multiple entrances, where they cannot be observed for follow up shots or retrieved.

As cited in the SEA, an Independent Expert Panel (IEP) report on the 2013 pilot culls in England found that between 7.4% and 22.8% of badgers were estimated to still be alive more than five minutes after being shot. It was also estimated that 6-19% of badgers may not have

been retrieved following a rifle shot and may have been at risk of marked suffering if hit but not killed by the first shot. In light of the IEP report and of the results following the second year of pilot culling, we judged that it had not been demonstrated conclusively that controlled shooting could be carried out effectively and humanely based on the criteria that were set for the pilots.

As the cull operation expanded, there were anecdotal improvements in the use of controlled free-roam shooting, including improved levels of training, leading to increased accuracy. At the time BVA asked for additional monitoring to illustrate improvements had been made but these were not forthcoming. It was not possible to see convincing demonstration of improvement and be assured of the welfare of the badgers shot.

We therefore take the view that cage trapping and shooting is preferable to the controlled shooting of free-roaming badgers. However, provided the highest standards of marksmanship and professionalism are demonstrated and maintained, and the programme is supported by a strong evidence base, controlled free-roam shooting supplemented by live capture could be considered as part of a wider and holistic bTB eradication strategy.

Question 11

Considering all the relevant factors above would you support a non-selective cull using baited cages as a potential Wildlife Intervention approach?

Yes	☒	No	☐	Unsure	☐
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Comments

If badger culling takes place, pain and suffering should be minimised as much as possible. It is likely, based on the available evidence, that cage trapping and shooting is preferable to controlled shooting.

Cage trapping and shooting can deliver a safe, effective and humane cull. Evidence suggests that most badgers caught by correctly designed and employed bait cages do not suffer any injuries, and those that do tend to pick up only minor injuries. Cage traps have been used extensively in England, monitored and modified to minimise welfare harms. According to statistics cited in Annex VII, only 3% of badgers trapped in cages exhibited more than minor injuries. This is substantially lower than the alternative method of stopped restraints, where the figure was 16%.

The potential welfare harms of cage trapping should however not be underestimated for a wild animal. For this method to be humane, cages should be set in areas where they are not exposed to extremes of weather (for example under natural cover, out of exposed areas of sunlight or high winds or in areas prone to flooding) and must be checked as soon as is possible each morning. Badgers must not be left in traps for extended periods of time and any non-target species must be promptly released. Where extreme weather conditions are anticipated, such as heavy rain, strong winds, severe wind chill, or extreme high and low temperatures, cage trapping must be suspended. Those approaching traps to dispatch badgers must do so in an appropriate way so as to minimise further distress.

Baited cages have previously been employed in Northern Ireland during the TVR research project, which means there is already some understanding of the strengths and limitations of this approach. While this is likely the best culling option for welfare outcomes, using baited cages is labour intensive and therefore generally more expensive than alternatives. Its effectiveness may also be limited by a portion of the badger population being 'cage shy' and not going into the cages, even with the use of bait. Lastly, it also may not be suitable for areas that are difficult to access. This should be taken into account by the Department when formulating its wildlife (badger) intervention strategy.

It should be noted that all non-selective cull options listed in this consultation are indiscriminate by nature and carry the obvious drawback that many test-negative badgers will be culled, something that is viewed poorly by the public. Non-selective cull options also lack the long-term benefits of interventions that include a vaccination element, which we

explore in further detail later in the consultation response.

We reiterate that we recognise there are situations in which it is necessary to control wildlife where there is a negative impact on human and animal health, food, agriculture, property or the environment. However, where there are alternative methods that are more targeted and are proven to be feasible and effective, we would strongly encourage the Department to consider them, in accordance with the Principles for Ethical Wildlife Control.

Question 12

Considering all the relevant factors above would you support a non-selective cull of badgers using stopped restraints as a potential Wildlife Intervention Approach?

Yes	☐	No	☒	Unsure	☐
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Comments

Stopped restraints are a form of snare and we do not support the use of snares as a wildlife intervention method in any situation. As noted in Question 11, in the quoted research stopped restraints have been shown to cause a notably higher number of injuries that are more than minor when compared with cages. Even though they are designed to allow a degree of movement, there is the risk that stopped restraints twist or get vegetation trapped in them and end up catching badgers by the neck or other body parts. Stopped restraints are also less effective in catching younger badgers and pose a risk of catching non-target animals like foxes and pets, as has been seen in the Republic of Ireland.

In our [snaring policy](#) we outline our concerns for the negative animal welfare impacts caused by snares across all species, including:

- dehydration and hunger / starvation (of caught animal and any dependent young);
- exposure to the elements;
- fear and distress (manifesting as escape behaviour which may include self-mutilation and, in rabbits, tonic immobility);
- external and internal injuries;
- asphyxiation from strangulation;
- exhaustion;
- predation (though we recognise there is an absence of significant natural predators for badgers in Northern Ireland);
- exertional or capture myopathy.

We accept that some of these welfare concerns will not be significant if the snare is inspected quickly and the badger is trapped for only a short time. Some of the concerns listed also extend to trapping with cages (see Question 11). The other listed negative welfare impacts of snares are however considerably greater than trapping with cages. It is our view that there should be an outright ban on the sale and use of snares to both the general public and trained operators in the UK. There are few countries in Europe that permit the use of snares to capture mammals (only Belgium, Latvia, the Republic of Ireland and the UK). In the UK snares are already banned in Scotland and Wales and there are plans to ban them in England too. We therefore cannot support the use of stopped restraints as a wildlife intervention option.

Question 13

Considering all the relevant factors above would you support a Test and Vaccinate or Remove using baited cages as a trapping method as a potential Wildlife Intervention approach?

Yes	☒	No	☐	Unsure	☐
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Comments

Please see Question 11 for our view on baited cages.

We support a holistic approach to tackling bTB that makes use of all the available tools in the toolbox. TVR is a more targeted and socially acceptable alternative to non-selective culling options. Through TVR, bTB test-negative badgers can be vaccinated, microchipped and safely released, which allows for better traceability and animal welfare outcomes. Those badgers that test positive can be culled.

However, the political attractiveness of TVR should not detract from the well-documented challenges associated with this method, and TVR alone likely cannot form the foundations of a swift and effective bTB eradication strategy.

One of the main points of contention around TVR is the effectiveness of Dual Path Platform (DPP) VetTB tests. While DPP tests (in common with other badger serological tests) have a high specificity (confidence that positive results are indeed positive), the same cannot necessarily be said for their sensitivity (identification of infected badgers). This means DPP tests may miss a substantial portion (up to half) of infected badgers, leading to a sustained risk of transmission from badgers to cattle.

Similarly, questions remain about the impact of BCG vaccines used on the badger population on the incidence of bTB in cattle in the same area. Annex VII cites studies that found that vaccination led to a 76% reduction in the risk of individual badger infection. The effect badger vaccination has on cattle bTB incidence is uncertain, but as BCG results in a reduction in severity of disease and disease transmission between badgers, leading to reduced bTB in the badger population, it is logical that this would eventually have a beneficial effect on bTB incidence in cattle. There are concerns that this would take substantially longer to achieve an equivalent end point as non-selective culling. Strategies involving the BCG vaccine may also be susceptible to supply chain issues, which could significantly limit the ability to rollout wildlife intervention programmes and measures should be put in place to mitigate any such risk.

Research is needed to determine the effect of badger vaccination on incidence in cattle and whether this is affected by badger population density. Vets as scientists, animal advocates and key advisors to farmers have a role to play in improving understanding of the role of vaccination as part of a holistic package of measures, its limitations, and its potential value

to their clients and the general public.

As mentioned in Question 6, the evidence base for TVR more broadly is also limited. Although the TVR trial in Northern Ireland produced a statistically significant decline in the proportion of test-positive badgers over the study, the same trends were not reflected in the cattle population. More research needs to be done on TVR, including testing its rollout in a wider range of areas and over longer periods of time, before we can make an informed judgement about its efficacy.

The Department should take into account the high financial costs associated with TVR. TVR requires live trapping, administering anaesthetic, taking blood samples, vaccinating and microchipping or euthanising test-positive animals. This process also needs to be repeated over successive years. As a result, TVR is consistently presented as the most expensive of the wildlife intervention options and the Department's analysis reinforces this. TVR will need to show a benefit and value for money, and the Department should design a fair and transparent cost-sharing approach for any rollout of TVR, as alluded to in Question 9.

Due to the questions around the effectiveness of testing and vaccination; the time it will take to reach similar results as non-selective culling approaches; and the high financial costs, we would have concerns about a wildlife intervention programme that relied solely on TVR or used TVR exclusively in all areas.

However, TVR may have a useful role within a broader wildlife (badger) intervention strategy. As suggested by Northern Ireland's Chief Veterinary Officer (CVO), an initial phase of TVR could be used to gather information on *M. bovis* prevalence within badger populations before transitioning to the most appropriate intervention for that area, whether continued TVR, vaccination or non-selective culling (ideally through the use of baited cages). This recognises that TVR can provide valuable surveillance data and we would support this methodology.

Question 14

Considering all the relevant factors above would you support a Test and Vaccinate or Remove using stopped restraints as a trapping method as a potential Wildlife Intervention approach?

Yes	☐	No	☒	Unsure	☐
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Comments

Please refer to Question 12 for our views on stopped restraints, and Question 13 for our views on TVR. We do not support stopped restraints as a wildlife intervention method. As a form of snare, they present significant animal welfare concerns, including the risk of injury, distress and prolonged restraint, and they may capture non-target animals.

Question 15

Considering all the relevant factors above would you support Vaccination Only using baited cages as a trapping method as a potential Wildlife Intervention approach?

Yes	☒	No	☐	Unsure	☐
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Comments

Please see Question 11 for our view on baited cages.

We support the continued development and deployment of badger vaccination as part of an integrated strategy to eradicate bTB. As mentioned in Question 13, vaccination of badgers and/or cattle offers important animal welfare and public acceptability benefits and should remain a key component of future disease control.

However, current evidence suggests that BCG vaccination alone is unlikely to achieve rapid reductions in bTB prevalence where infection is already established in any species. Successful vaccination programmes require sustained implementation over many years and high levels of coverage.

As Annex VII concludes, vaccination may be most effective as an exit strategy where disease prevalence has already been reduced, helping to maintain low levels of infection and reducing the need for continued lethal intervention. We support continued research to improve vaccine efficacy, diagnostics and delivery methods, with the long-term aim of reducing reliance on culling as scientific advances allow.

Question 16

Considering all the relevant factors above would you support Vaccination Only using stopped restraints as a trapping method as a potential Wildlife Intervention approach?

Yes	☐	No	☒	Unsure	☐
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Comments

Please refer to Question 12 for our views on stopped restraints, and Question 15 for our views on Vaccination Only. We do not support stopped restraints as a wildlife intervention method. As a form of snare, they present significant animal welfare concerns, including the risk of injury, distress and prolonged restraint, and they may capture non-target animals.

Question 17

Do you agree that the Veterinary Surgery (Vaccination of Badgers Against Tuberculosis) Order 2010 should be extended to NI allowing for the lay vaccination of badgers in NI, under licence to support bTB control?

Yes	☒	No	☐	Unsure	☐
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Comments

We support extending the Veterinary Surgery (Vaccination of Badgers Against Tuberculosis) Order 2010 to Northern Ireland to permit the use of licensed lay vaccinators as part of wildlife intervention programmes. This would align Northern Ireland with the approach already taken elsewhere in the UK and could increase operational capacity and the cost-effectiveness of bTB eradication programmes.

Any such arrangements must be subject to appropriate safeguards. Lay vaccinators should receive accredited training and operate under the direction and clinical oversight of a veterinary surgeon. Robust quality assurance, auditing and comprehensive record-keeping should also be in place to ensure high standards of animal welfare and maintain confidence in the programme.

While licensed lay vaccinators can support delivery, they should complement rather than replace veterinary expertise within wildlife disease control programmes. Veterinary surgeons should retain responsibility for programme design, prescribing where required, governance, and clinical decision-making.

Question 18

Are you content that the Blueprint strategy contains all necessary actions to address bTB in NI?

Yes	☒	No	☐	Unsure	☐
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Comments

We believe this policy proposal provides a comprehensive strategic framework for wildlife (badger control) intervention options to tackle bTB in Northern Ireland. We agree that wildlife interventions should form part of a broader eradication strategy but must be carried out in ways that follow the Principles for Ethical Wildlife Control. However, successful eradication will depend on maintaining equal focus on the wider package of disease control measures, as well as innovations in testing and diagnostics.

As explained in Question 5, wildlife intervention must be implemented alongside:

- Robust cattle controls;
- Improved biosecurity;
- Effective surveillance;
- Veterinary involvement;
- Farmer education and behavioural change;
- Continued investment in research (including on diagnostics and vaccines).

It is essential that wildlife intervention does not inadvertently lead to any reduction in the emphasis placed on these complementary measures.

We therefore support the Blueprint but encourage the Department to ensure it remains a living document that is regularly reviewed and updated in light of emerging scientific evidence and operational experience. Published and available welfare outcomes, adverse event reporting and clear thresholds for modifying or ceasing intervention including clear exit strategy should be made available and transparent. The Blueprint should also sit alongside a complimentary consideration of review of testing modalities and associated biosecurity measures.

Our [policy position on the control and eradication of bTB](#) sets out 35 recommendations that we believe are required across each aspect on the control and eradication of bTB.