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

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 17,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom’s veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

Introduction

2. We welcome the opportunity to submit a response to this consultation on proposals to introduce licensed badger control to prevent the spread of bovine tuberculosis (bTB) in the Low Risk Area of England.

3. The eradication of bTB remains a significant challenge due to the complexity of the disease and the large number of factors involved in its spread. The control and eradication of bTB from cattle and other susceptible farmed species is the only way to minimise the impact on animal health and welfare and on the farming industry, and so reduce cost.

4. We strongly support the principle of putting in place measures to achieve and maintain regional OTF status and recognise that the confirmation of TB infection in badgers puts that objective at risk. Control measures in cattle must be accompanied by simultaneous and coordinated measures in badgers and other wildlife and susceptible farmed species, including deer and camelids, for the success of the eradication programme.

5. Any measures taken to achieve eradication must be based on the application of both sound scientific research and veterinary epidemiology. It is important that we learn from the experiences to date.

6. BVA continues to call for any badger culls to be completed using the tried and tested method of cage trapping and shooting only, which can deliver a safe, humane and effective cull as demonstrated by the Randomised Badger Culling Trial (RBCT). We have called for a closed season to operate to protect dependent
cubs and to safeguard the welfare of badgers trapped in cages in inclement weather.

7. BVA are supportive of the principle of badger controls within the LRA of England where there is a demonstrated need. We recognise the expertise and professional judgement of veterinary and scientific colleagues in government to safeguard animal health and welfare. However, the lack of specific detail provided within the document makes it difficult for us to support the proposals as they stand. We question the way in which the consultation paper presents high-level principles rather than specifics. This could lead to a decision-making process that was insufficiently transparent. It is now important for Defra to work with the veterinary profession, industry and all relevant stakeholders to find a way forward.

The principle of controlling the risk from badgers with TB in the LRA.

8. BVA has stated in the past that control measures in cattle must be accompanied by simultaneous and coordinated measures in badgers and other wildlife and susceptible farmed species, for the success of the eradication programme. This general principle applies in the HRA, edge area and LRA of England.

The principle of a government-led badger control operation where required.

9. BVA has been supportive of government-led badger control operations. A centrally controlled, government-led cull would give better land coverage than can be achieved by an industry-led programme. We have accepted that given the financial circumstances in which Defra and the industry are operating, issuing licences to farmers/landowners can offer an appropriate way to operate a badger control policy in England. We also accept that a properly managed, targeted and audited industry-led cull can be as effective as a one led by government. However, when tackling an outbreak, as would be the case with the proposed policy, it is sensible for a government-led approach to be followed.

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.

10. As we have stated in the past, any methodology that underpins badger control must be no less robust than that based on the evidence from the RBCT in order for us to give our support. The consultation document states that “the conditions in place for licensed badger control in the LRA should not be the same as those in the HRA and Edge Area, but rather need to be specific to the particular circumstances of the LRA.” We are concerned that an evidence base for the proposed bespoke badger culling methodology for the LRA is not clearly stated.
11. We are particularly concerned that initiating badger culling in a “hotspot” within the LRA could amount to “reactive culling” as defined within the RBCT - and is not the “proactive culling” as defined in the RBCT.¹

12. The RBCT established that culling badgers can deliver a net benefit in terms of a reduction in the incidence of bovine TB in cattle. However, as part of the RBCT, reactive culling was discontinued in 2003 because confirmed herd breakdowns in these areas were significantly higher than in no-cull areas. Subsequent analysis of data from within the reactive culling areas found that the presence and extent of badger-culling activity were associated with significantly increased risk of a confirmed herd breakdown on nearby farms, and that when compared with no-cull areas the breakdowns were more prolonged.²

13. The proposals as currently stated would give significant discretion to APHA to determine the extent of a “hotspot” where badger controls could be enacted; the specific measures that would be applied in each case and the duration of any such controls. No criteria, methodology or direction is suggested within the document as to how APHA should apply this discretion. To provide clarity, we ask that a working definition for “hotspot” is set. We would ask that area parameters are set for hotspots. This should ensure hotspots are not too small they prove counter-productive and to minimise any possibility of a perturbation effect.

14. The consultation document notes that the length of time badger controls could be carried out will be decided in a “case-by-case approach”. We would note that if culling of badgers is not conducted in a sustained manner this could result in a smaller benefit or even a detrimental effect on confirmed cattle bTB incidence. We are concerned that there could potentially be shorter term licences (less than four years) issued within the LRA which could ultimately prove detrimental. It would be helpful if some clarity could be given as to the working criteria that will be used.

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

15. As stated above BVA control measures in cattle must be accompanied by simultaneous and coordinated measures in badgers and other wildlife and susceptible farmed species, including deer and camelids, for the success of the eradication programme. This general principle applies in the HRA, edge area and LRA of England.

16. Paragraph 4.8 of the consultation document lists the potential controls that may be used separately or collectively in the LRA. However, this list fails to provide sufficient detail to provide comment or to give our support at this time.

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.

17. We are concerned that there is currently no detail as to how any badger population estimates will be achieved or monitored. It is clear that badger population estimates have previously demonstrated considerable uncertainty and imprecision. It is critical that as accurate as possible population estimates, using an evidence-based methodology, are obtained and made openly available. The same method should be used at the start and end of the process.

18. The language used within the consultation document is vague. We would seek clarification on what constitutes a “sufficient” reduction in the badger population. There is an argument for setting the minimum number of badgers to be culled at 70% of the maximum estimated population size, to ensure disease control benefits, and the maximum number to be culled at 95% of the minimum estimated population size.

On the proposed revisions to the Guidance to Natural England on licensed badger control

19. BVA would call for any licences issued by Natural England to mandate badger culls to be completed using the tried and tested method of cage trapping and shooting only, which can deliver a safe, humane and effective cull as demonstrated by the Randomised Badger Culling Trial (RBCT).

20. We would also ask that any LRA licencing scheme reflect our calls above, specifically relating to clarification on what constitutes a “sufficient” reduction in the badger population; and ensuring a cull is sustained for at least 4 years to comply with the finding of the Randomised Badger Culling Trial (RBCT).

21. Considering vaccination of badgers, we would seek clarification of the Natural England recommended best practice which is in place for the HRA and Edge Area and if this would be expanded to include the LRA.
Any additional comments or approaches which you feel are relevant but not captured by the questions above.

1. BVA are supportive of the principle the concept of badger controls within the LRA of England and understand the need to address bTB now. However, evidence cited within the consultation document does not carry sufficient weight to overturn the findings of the RBCT. We are therefore unable to fully support the proposals as written within the consultation document, without significant strengthening of the evidentiary underpinning or a change in the methodology.

2. We note the review of the government’s Strategy to eradicate bovine tuberculosis (bTB) in England is expected to complete by the end of September 2018. Any decision to implement badger control in the Low Risk Area should be informed by the findings of Professor Sir Charles Godfray’s review.

3. As stated above it is now important for Defra to work with the veterinary profession, industry and all relevant stakeholders to find a way forward.