Response to Defra consultation - Revised guidance for licensing badger control areas

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 are grateful for the opportunity to submit a response to this consultation on proposals to revise guidance for licensing badger control areas.

3. The eradication of bTB presents 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.

Proposals

Government-led or Industry-led

1. The proposal, as delineated within the consultation document, intends to increase the potential to achieve disease control benefits, by introducing more flexibility in the maximum number of new licences issued each year. We note that removing the current cap of ten new licences per year may provide some flexibility. However, there is concern that the current industry-led system severely limits this flexibility - as the ability to act remains entirely subject to the number of licences applied for and this is not necessarily determined by the need for disease control.

2. 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 and therefore will likely be more effective. However, BVA has accepted that given the financial circumstances in which Defra and the industry are operating, issuing licences to farmers/landowners might offer an appropriate way to operate a badger control policy providing proper standards on management, targeting and auditing are met.
Monitoring and audit

3. In the past BVA has given conditional support for the introduction of supplementary badger control as part of a comprehensive strategy to tackle bTB. However, BVA has called for a number of conditions to be met when licences are issued, including the retention of adequate levels of monitoring and audit.

4. BVA is concerned that these conditions are not being met at present. Therefore we would question if there is the capacity to provide appropriate oversight of an expansion in the numbers of licences issued. Any expansion in the numbers of new licences issued each year must be combined with commensurate funding to ensure the capacity exists to provide full monitoring and audit of those licences.

Further considerations

5. Beyond monitoring and audit, BVA calls for any decisions on licenses issued, to consider the following:
   - Quantification of when badgers are considered to be a significant contributor to the persistent presence of bTB in cattle;
   - The maintenance of existing licence conditions;
   - Robust estimation of the populations of badgers in an area as accurately as possible using an evidence-based methodology;

6. We continue to call for targeted and humane badger culling using cage trapping and shooting only. We remain opposed to the continued use of controlled shooting as part of the badger control operations.