

BVA response to Defra's consultation on proposals to evolve badger control policy and introduce additional cattle measures

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Introduction

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,000 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.
- 2) We welcome this opportunity to respond to Defra's consultation on proposals to evolve badger control policy and introduce additional cattle measures.

Q5. To what extent do you agree or disagree with the stated objective of a targeted badger intervention policy? a. Strongly agree b. Agree c. Neutral d. Disagree e. Strongly disagree f. I don't know/I don't have enough information

- 3) Agree.

Q6. 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? a. Yes b. No – too limited c. No – not limited enough d. I don't know/I don't have enough information

- 4) I don't know/I don't have enough information

Q7. Should there be an annual cap on the number of clusters that can be licensed to undertake badger culling? a. Yes b. No c. I don't know/I don't have enough information

- 5) No.

Q8. What other factors should be taken into consideration in defining a cluster under the targeted badger intervention policy? (optional)

- 6) We agree with the considerations outlined in the consultation for defining a cluster but feel that they need further consideration and added detail. We welcome the process for identifying clusters, through the removal of those breakdowns caused by high-risk cattle movements, however we are concerned that this does not cover cow-cow spread in enough detail. Considering cattle movements is just one part of the picture and spread between cows on farm is a significant concern. The analysis of these areas must show a clear badger related risk and the proposed testing of culled badgers, is welcomed - RTA badgers could also be included in this assessment as part of cluster risk definition. The impact of culling in these areas must also be regularly assessed. It must be remembered that if culling takes place, the aim is to reduce the badger population in these areas, not eradicate it and every effort should be made to ensure that this is the case. We continue to emphasise that the policies needed to eradicate bTB must be holistic and evidence led. Badger culling should of course always be accompanied with continuation of robust cattle bTB control measure in these areas.

Q9. Please give reasons for your answers to this section (optional).

- 7) Q5 and Q6 - Badgers are a wildlife reservoir for bTB in some areas where the disease is endemic in cattle and can contribute to sustaining the disease in cattle. Measures are needed to control the transmission of bTB between the two species in both directions; badgers to cattle and cattle to badgers. The available evidence shows that proactive badger culling can result in significant reductions in incidence of bTB in cattle. We can only support this policy as part of a wider holistic approach to eradicating bTB including robust and continued control of cattle movements, effective biosecurity, disease surveillance, badger controls (culling and vaccination as appropriate), in close consultation with local farming communities and always being evidence led. These are all vital in

combating the disease.

- 8) Q7 – Once again we refer to the need for any initiative to be evidence led. We do not think there should be a limit on the number of badger culling licences. If there is a demonstrated need for a badger cull as a part of a wider strategy to eradicate bTB then it should not be limited by the availability of licences. Equally badger culling licences should only be issued where a cluster is well defined with identified badger involvement.

Q10. To what extent do you agree or disagree there should be a separation of Natural England's statutory conservation advice from licensing decisions? a. Strongly agree b. Agree c. Neutral d. Disagree e. Strongly disagree f. I don't know/I don't have enough information

- 9) I don't have enough information.

Q11. Do you agree that the Secretary of State should assume the role of licensing authority for culling under a targeted badger intervention policy? a. Yes b. No c. I don't know/I don't have enough information

- 10) I don't have enough information.

Q12. Please give reasons for your answers to this section (optional). [free text response]

- 11) We don't have enough information to comment on the suggested change in licensing. It is however essential that badger culling remains safe, effective and importantly humane. Any change in licensing authority must not result in any negative impacts upon animal welfare. Anyone who does have this authority should have the accompanying responsibility of monitoring especially with reference to human safety and animal welfare during culling. We can see benefits to the separation of Natural England's conservation role from badger culling licensing, however there is need for strong epidemiological and veterinary guidance at all stages of the licensing process. The issuing of licences must also continue to be evidence based and transparent.

Q13. 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) [free text response]

- 12) We agree with the content of the Information for Applicants at Annex B for carrying out the culling part of a targeted badger intervention policy. UK Government must ensure there is enough funding and staff resource for Defra and APHA to effectively manage this policy. Disease eradication schemes require collaboration from all key stakeholders and to enable effective implementation APHA must be swift and accurate in identifying clusters and Defra needs to ensure all those under the licensing regime are compliant. Badger culling is an unfortunate but necessary tool in dealing with bTB and it is most effective if those carrying out the cull are coordinated and adhere to the requirements set out in Annex B, in addition to the other disease management measures we have outlined in previous answers. The need for licence holders to be able to demonstrate an ability to vaccinate badgers after culling has ceased is also noted and welcomed.

Q14. Do you have any other comments on the proposals for a targeted badger intervention policy? (optional) [free text response]

- 13) Badger culling should be deployed in a targeted, effective and humane manner only where cull design is based on the best available evidence.
- 14) Control activities should be appropriately monitored in order to ensure the effectiveness and humaneness of operations can be assessed during culling operations, and to inform continuous improvement. This monitoring must have adequate capacity, including veterinary input, for monitoring to be effective. Evidence suggests that cage trapping and shooting of badgers is overall preferable to free-shooting from a welfare perspective and this method should be deployed where possible. Efforts to further reduce any distress or injury experienced by badgers through cage trapping and shooting should be an ongoing priority for government.
- 15) Although the consultation mentions the use of badger vaccination in the year following the cessation of culling for typically 4 years, detail on this exit strategy is lacking. More details of the criteria for move to vaccination in a cluster area, and how this would be deployed, are required.

Q15. Should animal level bTB risk information be published on ibTB? a. Yes b. No c. I don't know/I don't have enough information

- 16) Yes.

Q16. Please give reasons for your answer (optional). [free text response]

17) We agree with the consultation's rationale for storing animal-level risk information on iBTB. As noted, only herd-level risk information is published at the moment and from a disease control perspective animal-level information would better inform purchasing decisions if made publicly available in a user-friendly format. This will be important to alert potentially unsuspecting buyers of the uncertain risk and to highlight those who are non-compliant. The expansion of government traceability IT systems should also incorporate animal health data at the point of sale. Ultimately, we would like to see all relevant information centralised through the Livestock Information Transformation Program, rather than just TB specific information being available through iBTB.

Q17. To what extent do you agree or disagree it would be helpful to share information on where herd owners source their stock from? a. Strongly agree b. Agree c. Neutral d. Disagree e. Strongly disagree f. I don't know/I don't have enough information

18) Agree.

Q18. Please give reasons for your answer (optional). [free text response]

19) Government, in collaboration with industry, should develop a framework that ensures that farmers complying with highest standards of biosecurity on farm, alongside best practice informed purchasing off farm, continue to enjoy the highest levels of compensation. It is imperative that the veterinary profession is involved in the development and use of such a programme. The framework should include a practical and accessible scoring system derived from centralised national databases to enable verification and assess compliance. This could build on the lessons of the CHeCS (Cattle Health Certification Standards) TB Herd Accreditation Scheme.

Q19. Do you have any other comments? (optional) [free text response]

20) Central to the prevention and management of any infection is good biosecurity, the series of measures that protect against the entry and spread of pests and diseases. Biosecurity practices on livestock farms include sanitation, animal management, feed management, facility maintenance, manure handling, sufficient robust separation of livestock groups, and disposal of dead animals. Additional wildlife-proof biosecurity measures will be required based upon local risks. In order to improve biosecurity on the ground, policies, innovations, and best practices, must be implemented on-farm. Improving understanding, achieving buy-in, and changing the farming practices must form an integral part of improving biosecurity. Vets are the trusted advisors of the farming community and play a vital role in raising the importance of biosecurity.