

Response to Bovine Tuberculosis: the Government's approach to tackling the disease and consultation on a badger control policy

The Woodland Trust welcomes the opportunity to respond to this consultation. We are the UK's leading woodland conservation charity with a vision that the UK will be rich in native woods and trees enjoyed and valued by everyone.

The Trust owns over 1,000 sites across the UK and has over 300,000 members and supporters.

General comments

The Woodland Trust recognises the seriousness of bovine TB, its impact on farmers' livelihoods and its cost to the taxpayer. It recognises the need for a solution to this problem that can be sustained into the long-term. However, as a conservation charity the Trust is also concerned that account should be taken of the potential impact of removing a keystone woodland species from large areas of the countryside and the ecological impact of the same on woodland ecology.

The Trust's position on policy in relation to bovine TB, and in particular in relation to badger culling, is guided by the best available scientific evidence and advice.

Question 1: Comments are invited on the options, costs and assumptions made in the impact assessment

The Trust's position is that badger culling is not the solution to bovine TB in the UK. Our view is based on the results of the largest, independent, and rigorously peer-reviewed scientific study of the issue, the Randomised Badger Culling Trials (RBCT), beginning in 1998 and finally reporting in 2007, which was overseen by the Independent Scientific Group (ISG) appointed by Government. While this study showed sustained and widespread culling over a very large area could reduce incidence of bovine TB in the short-term, it also increased incidence outside the culling area in the short-term. It is still too early to say what the very long-term impacts of such culling might be. The study has concluded that such an approach is impractical (there are few areas where the specific criteria set out by the ISG could be met) and not cost-effective.

The Government's proposal in this consultation is to licence farmers and landowners to cull and vaccinate badgers. However, it is also proposing some changes to cattle-based measures such as re-focusing testing on high-risk herds. The full details of these changes are not entirely clear from the consultation document. However, by introducing culling at the same time as other changes, it will not be possible to properly assess the impact and



effectiveness of each. The Woodland Trust would urge that there needs to be an overall increase and tightening up of cattle-based measures rather than any reduction.

Question 2: Do you agree with the preferred option?

No.

The document states that the link between cattle and badgers in transmission of bovine TB is complex, and that incidence of bovine TB is not directly proportionate to density of badger population. The option suggested is likely to reduce badger populations in a given area but there is no way of showing that it will result in a sufficient reduction to impact on the incidence of bovine TB, since it will be dependant on the time and resources farmers and landowners are able to commit at any time. There is also no way of guaranteeing that this option will not result in local extinction of badgers, potentially contravening the Bern Convention on the Conservation of European Wildlife and Natural Habitats (see response to Question 8 on monitoring).

Trials of vaccination of badgers have been started this year but have not been given a fair test period. The Woodland Trust would have preferred to have seen more investment in scientific testing of this method, enabling proper comparison of its efficacy in relation to culling. We would support any proposals to carry out a vaccination-only trial.

The consultation document states that both a cattle vaccine, and the DIVA diagnostic test to differentiate infected from vaccinated animals, should be approved by 2012. If the option proposed goes ahead, culling of badgers would begin no earlier than 2011, but would continue for at least four years. We are concerned that going ahead with a cull will may deter farmers from opting for cattle vaccines, which we believe is the best hope for containment and control of bovine TB in the long term. It may also reduce the impetus to roll out cattle vaccines once they are developed. Our preference would be to see increased investment in development, testing, application and monitoring of a cattle vaccine, along with further tightening of cattle-based measures such as increased biosecurity and pre-movement testing.

Rigorous scientific study, through the RBCT, has shown that even though sustained culling over a widespread area may be effective in reducing the incidence of bovine TB within the culling area, it can lead to an increase outside the culling area. While the latter effect does appear to tail off in time, the study has still concluded that, overall, the costs of culling outweigh the benefits in terms of reducing bovine TB. The consultation document itself states that the proposals will result in little cost saving, but will shift costs to landowners and away from taxpayers. The Woodland Trust believes that this is a false economy, and that more needs to be invested in coming up with a long-term solution to the problem.

Question 3: Do you agree that this approach, of issuing licences to farmers/landowners, is the most appropriate way to operate a badger control policy?

No. This approach relies on farmers and landowners having the time and resources to carry out a sustained and widespread cull of badgers over four at least four years. While

landowners may feel committed to reducing the badger population in order to tackle the problem of bovine TB, there are many other demands on their time and money, and there is no guarantee that they will carry out culling at the level suggested.

In terms of vaccination of badgers, the proposal is that this would be undertaken on a voluntary basis. Many farmers and landowners will be reluctant to do this because of the cost implications. The opportunity will therefore not be taken to reduce the incidence of bovine TB due to the perturbation effect, as suggested in the document. In the short term, the proposal could therefore lead to an increase in bovine TB in the areas surrounding the culling area.

Question 4: Do you agree with the proposed licensing criteria for culling and vaccination?

The Woodland Trust does not agree that licensing farmers and landowners to cull and vaccinate badgers is the most effective way to tackle bovine TB (see above). However, should this option go ahead, we agree that it should only be in areas where there is a very high incidence of bovine TB, and where landowners are prepared to work cooperatively together to ensure the criteria set out in the results of the RBCT are met. We do have some concerns. For example, land access to 70 per cent of the area does not guarantee culling at the same levels as were achieved in the RBCT, which was a funded, carefully controlled scientific study. There is therefore no guarantee that the same results will be achieved. If land ownership were to change in an area during the four-year period, this could affect the ability of the remaining landowners to carry out effective culling, should the new owner not wish to participate. The proposals need to make provision for what should be done in such an event.

Question 5: Do you agree that the proposed methods of culling are effective and humane?

The Woodland Trust does not agree that culling badgers is the right solution to the problem of bovine TB (see above). However, should the option proposed go ahead, it is essential that proper controls and monitoring are put in place. The Woodland Trust welcomes the dismissal of options such as gassing and snares, which it agrees would not be acceptable. We have some concerns that free shooting of badgers may make it difficult to monitor levels of culling and the effectiveness of this option, since it relies on landowners retrieving all carcasses. It is not clear how it will be monitored that this has been done.

Question 6: Do you agree with the proposed use of vaccination, particularly its focus on mitigating the perturbation effects of culling?

We do not object to the use of vaccination per se. In fact we believe it may be a preferable method for tackling bovine TB, but it is impossible to prove this as the pilot studies have not had a chance to produce results. We believe that farmers and landowners are far less likely to take up the option of vaccination because of cost, and that culling will be seen as a preferable method. If vaccination is being proposed as a measure to mitigate the perturbation effects of culling, then it should perhaps be made compulsory, or the costs



covered by Government, in order to ensure it happens and to protect those farmers with cattle at the edges and just outside culling areas.

Question 7: Should anything further be done to encourage the use of vaccination?

See Question 6 above.

Question 8: Do you agree with the proposed monitoring?

No. The level of detail given on monitoring in the consultation document is wholly insufficient for us to form a view, and suggests that this area has not been properly thought out. For example, how will badger population numbers be monitored? Will a baseline survey be carried out, and if so, what form will this take? Who will carry out this survey, and how will they ensure they have access to all land in the chosen area, even that belonging to owners who have chosen not to participate in the culling exercise? If this cannot be ensured then how can monitoring of total badger populations in the culling area be accurate? How frequently will badger populations be monitored, and what form will this monitoring take? How will this ensure that local extinctions do not occur? What is the threshold population level at which action should be taken to cease culling, if extinction is threatened?

In relation to incidence of bovine TB, how will it be possible to ascertain that badger culling is responsible for any change, as opposed to other factors, such as improved cattle-based measures, improved biosecurity, use of vaccination etc?

We would wish to see a much more detailed programme of the monitoring to be carried out around this work before it should go ahead. There is otherwise a danger that culling goes ahead unchecked and that after four years it is impossible to say definitively whether or not it has been effective.

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