

## **“Consultation on guidance to Natural England on licences to control the risk of bovine tuberculosis from badgers”**

### **Response from Wildlife and Countryside Link**

**September 2015**

Wildlife and Countryside Link (Link) brings together 46 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together our members have the support of over 8 million people in the UK and manage over 750,000 hectares of land.

This response is supported by the following 15 Link members:

- Amphibian and Reptile Conservation
- Badger Trust
- Born Free Foundation
- Buglife - The Invertebrate Conservation Trust
- Butterfly Conservation
- Friends of the Earth
- Humane Society International/UK
- International Fund for Animal Welfare
- Peoples' Trust for Endangered Species
- Royal Society for the Prevention of Cruelty to Animals
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- Wildfowl and Wetlands Trust
- Woodland Trust
- World Animal Protection

### **Introduction**

Link recognises that bovine tuberculosis (bTB), and more specifically the methods adopted in attempts to control and ultimately eradicate the disease, cause significant hardship for farmers, and come at a significant cost to the taxpayer.

The long-term aim of achieving Officially bTB-Free (OTF) Status for England, through a staged risk-area-based process, is welcome. The development of risk-based approaches to cattle trading and movement is also much needed, and the focus on effective application of disease control measures in cattle, best practice in livestock farming achieved through advice and appropriate use of rewards and penalties, the development of improved testing techniques, and the research into new tools particularly relating to vaccination, are all commendable.

However, we believe that the Government still shows a misplaced focus in some important respects. Most notably, there is far too great an emphasis on control of the perceived infection reservoir in badgers in the High Risk Area (HRA) through the use of culling, when independent scientific opinion is at best highly sceptical about the likely impact of widespread badger culling on the incidence and prevalence of bTB in cattle.<sup>1</sup>

### **Proposed licence changes**

#### **Link rejects the changes suggested by DEFRA in its consultation document and strongly advises DEFRA not to adopt them.**

Section 10 (1) (g) of the Protection of Badgers Act 1992 allows for the licensing of badger culling 'for the purpose of preventing the spread of disease'. Therefore any changes to licence criteria should be solely aimed at improving the likelihood of disease being prevented.

The current licence criteria require that culls should take place over a minimum area of 150km<sup>2</sup> in which access to a minimum of 70% of the land area is guaranteed, and should be completed within a 6 week period.

These, along with other requirements, were proposed by a meeting of scientific experts convened by DEFRA on 4th April 2011<sup>2</sup>, in order that culls might achieve the reductions in bovine TB incidence in cattle predicted by the proactive culling carried out in the Randomised Badger Culling Trial. The meeting also concluded that: *'If culling is not conducted in a coordinated, sustained and simultaneous manner according to the minimum criteria, then this could result in a smaller benefit or even a detrimental effect on confirmed cattle bTB incidence.'*

### **Conclusion**

The proposed changes in the consultation document would appear to be designed to relax the criteria that badger cull licence applicants need to fulfil, in order to make it easier for licence applicants to meet those criteria. The consultation document provides no evidence to suggest that the proposed changes will improve the likelihood of disease being prevented.

Link rejects the changes suggested by DEFRA in its consultation document and strongly advises DEFRA not to adopt them.

### **Wildlife and Countryside Link September 2015**



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<sup>1</sup> Bateson, P. *et al.* (2012) Culling badgers could increase the problem of TB in cattle, The Observer, 14 October  
<http://www.theguardian.com/theobserver/2012/oct/14/letters-observer?guni=Article:in%20body%20link>

<sup>2</sup><http://webarchive.nationalarchives.gov.uk/20110911090544/http://archive.defra.gov.uk/foodfarm/farmanimal/diseases/atoz/tb/documents/bovinetb-scientificexperts-110404.pdf>