



**Controlling the Spread of Bovine Tuberculosis**  
**in Cattle in High Incidence Areas in England:**  
**Badger Culling**

Response to the Defra consultation document

by

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**The Rare Breeds Survival Trust** represents all the endangered native breeds of cattle in the UK, and these have been identified as a conservation priority by Defra in the Country Report (2002) and by FAO in the SoWAnGR survey. Several of these breeds have suffered significant losses, and their owners' financial losses, as a result of TB infection and measures to control TB.

## Questions

### The Principle

1. **In the light of the evidence presented as part of the consultation, on balance, do you think a policy to cull badgers should be part of the approach to help control the disease in cattle in high incidence areas?**

The RBST believes that a policy to cull badgers is essential as part of the strategy to control TB in the UK. The evidence to support this view is overwhelming.

- a. Spread of the disease is running out of control, with a cumulative increase of 18-20% per annum for the past two decades in new herd incidents and number of cattle slaughtered.
- b. Costs associated with the disease have increased as it has spread. The costs in 2004/5 were circa £130m, divided 70/30 between the taxpayer and livestock farmers, although the costs to farms closed up because of control restrictions on cattle movement have not been calculated and the actual cost of TB to the livestock industry is greater than the costs provided in the report.
- c. In view of the evidence that badger culling reduces the incidence of TB in cattle, it will be cost effective for both the taxpayer and farmers.
- d. Many species of wildlife are infected, but badgers are the main vectors.
- e. Controls have been put in place to reduce the spread of bovine-to-bovine infection, but this will not be effective unless control of infection from badgers is also in place. The two measures must be applied in concert.
- f. The welfare problems for both cattle and badgers are significant, especially for badgers where the disease may affect 25% of the animals in an infected sett and 10% may die.
- g. TB is a serious zoonose which threatens the human population. The emotional stress on farmers also is a major factor.
- h. In contrast to the success of TB eradication programmes in most of Europe, the UK is the only country in Europe where TB is increasing.

### Considering the Options for a Badger Culling Policy

2. **Comments are invited on the options considered and the costs and assumptions made in the Partial Regulatory Impact Assessment**
  - a. It is difficult to relate the figures in the RIA to the likely comparative costs in the future. The fundamental issue regarding costs is that they are likely to escalate out of control in tandem with spread of the disease unless a badger culling policy, combined with other measures, is put in place.
  - b. Expenditure now to control badgers will be a sound investment.

### Individual licensing to cull badgers to help control bovine TB

3. **Under what circumstances should the Government grant licenses to cull badgers for the purpose of preventing the spread of bovine TB under the Protection of Badgers Act 1992?**

- a. Licences should be granted in all areas which have a history of TB, or where animals with TB infection are identified.
- b. In particular, licences should be granted where an infection occurs in a new area, and is unlikely to be due to cattle movement, in order to prevent further spread of the disease.

4. **What qualifying geographic criteria would be appropriate, available and reasonably likely to be an effective disease control measure?**

There must be a sufficient barrier of distance around infected areas to allow for the expected movement of badgers under a culling operation.

### General Cull

5. **How could farmers ensure sufficient coverage to deliver a sustained cull over a large area?**

- a. We doubt whether such a serious exercise can be delegated effectively to other agents such as farmers, and it is essential that Defra should coordinate the culling process.
- b. Individual farmers may vary in their approach to the problem, and the cull is only likely to be effective if it is applied rigorously and consistently. There also will be farmers within an infected area who do not own livestock, and culling will need to be carried out on their land.
- c. Agents must be professional, as the successful use of the Army in the FMD outbreak demonstrated.

### Targeted Cull

6. **What qualifying disease history would be appropriate?**

All infected premises plus a margin of <3km from the boundary of such premises

7. **What could be included in the criteria to define those farmers eligible for a license to cull badgers?**

See answer to question 5.

8. **Would it be practical for primary herd owners to recruit neighbours and adjoining landowners to achieve, say, 75% coverage within 1km of the boundaries of their holding? If not, what might be achievable and reasonable?**

See answer to question 5

9. **Over what size of area could self co-ordinated groups of farmers and landowners be expected to manage a cull consistently and efficiently for up to 5 years, with a high degree of coverage?**

See answer to Question 5.

Perturbation following local culling creates the edge effect, and negates the value of a reduced incidence of the disease in the infected area. Therefore, except where an infection is identified in a new area, the cull should be implemented over a large area.

#### Methods of Culling

10. **Are there other methods of culling which should be considered?**

We would consider any effective method.

#### Gassing

11. **Is gassing appropriate for use under license by groups of farmers, landowners, and their agents?**

We consider that gassing is appropriate because it is suitable for use over large areas which will minimise perturbation and the edge effect. It also poses fewer welfare questions, and has other advantages as mentioned (e.g. no disposal problems, easier for farmers to be involved; can be done during daylight hours, avoids the need for a close season). If further research is necessary, we would ask that this is expedited.

12. **Would there be a need for training of licensees? If so, what form should this take?**

It is essential that agents/licensees are professional, and we consider that Defra should establish training groups.

13. **How could this training be best provided?**

See above.

#### Shooting of free running badgers (under licence)

14. **Would permitting the shooting of free running badgers (under licence) be practical and acceptable?**

We have doubts about shooting as a control mechanism. The welfare aspects, especially relating to free running badgers, are not convincing.

#### Snaring

15. **What features should be included in the design and use of the body snare?  
Are there particular features that should be avoided or included?**

We do not favour snaring. Cages would be more acceptable.

16. **What inspection intervals for checking snares would meet welfare considerations and be practical?**

See answer to question 15.

17. **What skills and competencies for culling are required to ensure body snares are safely and effectively deployed?**

See answer to question 15

18. **Is there a need for training for farmers or licensees? If so, what form should this take?**

See answer to question 15

19. **How could this training be best provided?**

See answer to question 15

#### Disposal of carcasses

20. **What methods of disposal would be suitable to minimize risk of disease transmission, assist in monitoring a cull of badgers and be practical?**

We favour gassing with automatic burial.

We also would favour burial if other methods of culling are used.

#### Monitoring

21. **Do the proposals for monitoring the impact on wildlife (paragraphs 93-95) look at the right issues? If not, what else do you think should be monitored?**

A formal programme to monitor other wildlife is unnecessary, but opportunity should be taken to make random checks as a precaution.

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