

..... is an ever-growing group of individuals concerned that the Government is proceeding with its amoral, ill-advised, unnecessary and inhumane badger cull policy against the advice of independent and well-respected scientific experts and ignoring the justified concerns of conservation and animal welfare groups

6 (a). Your comments are invited on the principle of controlling the risk from badgers with TB in the Low Risk Area (England).

We oppose badger culling in LRAs for many reasons not least because it's an unnecessary attack on a native species that will be a waste of time, effort, money and an astounding loss to the public

The Government's own documents show that the risk comes from bought-in cattle. Thus it would be far more effective to focus on the principle of controlling the risk from cattle with TB passing bTB onto other cattle and badgers. Documented evidence and peer-reviewed science shows that the majority of new breakdowns can be traced back to cattle-cattle transmission and there are recent cases of farmers found guilty of illegal movements of cattle from HRAs to LRAs¹

Farmers must be re-educated to take cattle-cattle transmission much more seriously and the focus on badgers is an unnecessary distraction for both the farming industry and the cattle vets.

Badger vaccination has been shown in the Welsh IAA when used in conjunction with stricter cattle controls and testing regimes to be far more effective in lowering the very limited risks posed by badgers to cattle

6 (b). Your comments are invited on the principle of a Government-led badger control operation where required.

Due to our answer to 6 (a), we oppose the principle of a Government-led badger cull. Since the RBCT, the present, badger cull is (and has been) farmer led in an attempt to reduce costs to the taxpayer. It appears that the Government has in mind to introduce government-led culls in LRAs if a suitable cull company that is farmer-led doesn't materialise in key areas.

Firstly, there is NO evidence that farmer-led badger culls have reduced the number of TB breakdowns. In fact, there is evidence (despite the lack of clarity and transparency from Government) that after four years of culling incidents of new breakdowns in Gloucestershire are similar to the levels experienced prior to culling whilst those in West Somerset may have slightly increased.

¹ https://www.farminguk.com/News/Sussex-farmer-fined-20-000-for-risking-the-spread-of-bovine-TB_45947.html

Worryingly, the wording in the consultation appears to open the door to a Government-led cull operating under the Animal Health Act that would not require a Licence from Natural England. The Animal Health Act also allows ‘methods of destruction that would otherwise be unlawful’.

This could, in the worst case scenario, result in Government employees ‘legally’ accessing protected land (such as the National Trust) without permission in order to gas or poison badgers if this area was ‘selected’

Government passed the Protection of Badgers Act for a reason – to protect badgers because, in some places, their population had fallen to dangerously low levels. Ignoring this Act in order to kill badgers for the alleged purpose of ‘preventing the spread of disease’ when there is no evidence that this will happen is tantamount to tearing up the Act by the back door. Which in the 21st century shows an astonishing disregard for the democratic process.

In response to the statement “Spread of TB between badger social groups is relatively slow where the density of badgers is high and stable” ²we would suggest that localised culling will significantly disrupt the social groups leaving them more open to getting TB from cattle

6 (c). Your comments are invited on the principle of taking a precautionary case-by-case approach, dependent on the local conditions and situation, including as regards the number of years in which culling is carried out

‘Precaution’ is a strange word to use since there is no evidence that small-scale culling will do anything to help reduce the incidents of TB. Instead the evidence points to increased harm to badgers by culling.

There is no detail on the prevalence of TB in badgers in the LRAs but there are statements that it is ‘lower’ than in the HRAs. Since the evidence points to cattle-badger transmission being more important in the LRAs, why isn’t there any focus or investment in badger vaccination that is the most effective tool in reducing cattle-badger transmission significantly? This would, without doubt, be the most **precautionary** and, by definition, least harmful way to approach a case-by-case situation

In our experience, supplementary culling (ie the number of years culling will be carried out) is simply a way of removing the Protection of Badgers Act for the duration of an ‘open’ season. There are no figures from either of the original cull zones of how many badgers have been killed by either free-shooting or cage-trapping & shooting during 2017-8. Instead the Government states that the data will be released ‘in due course’. Added to this, the Government has provided no empirical evidence to confirm that supplementary culling will reduce the prevalence of bTB in cattle.

² (p 3, 2.7 https://consult.defra.gov.uk/bovine-tb/badger-control-in-low-risk-area-england/supporting_documents/bovinetbconsultlicensecontrollraengland.pdf)

. We know that the policy of extending the badger cull to LRAs will result in untold numbers of badgers killed for no good reason for an unknown number of years against the will of the majority of people whilst the Government continues to hide behind vague statements with a shocking lack of criteria, clarity and transparency.

6 (d). Your comments are invited on the principle of using culling or vaccination or a combination of the two to control risks from badgers with TB in the LRA.

Evidence shows that badger vaccination carries no risk of perturbation and figures from the Welsh IAA (though a small sample size) shows that there is a reduction in TB in badgers when more strict cattle testing and controls are used in tandem with badger vaccination. . Badger vaccination will get more public support and would demonstrate to the world that Britain takes its responsibilities to wildlife conservation seriously.

There is absolutely no evidence to show that a combination of culling and vaccination would be effective. In fact, since the badger population is disrupted by culling so any culling would reduce the chances of badger vaccination being effective. Worryingly, the consultation document dismisses the risk of perturbation with a breath-taking lack of understanding of badger behaviour and ecology.

6 (e). In relation to cases where culling is deployed, your comments are invited on the principle of lowering the badger population of the affected area sufficiently to reduce the risk of infection of cattle from badgers (whether through direct or indirect contact), and ideally substantially reduce or even eliminate it.

With the results of the RBCT and the recommendations of the ISG firmly in the public domain, we wonder why this question is asked. There is no evidence to show that localised badger culling will be effective in 'substantially reducing or even eliminating' the risk of infection from cattle by badgers. And the wording used, reminiscent of the Animal Health Act to authorise 'methods of destruction that would otherwise be unlawful' is extremely worrying (see our response to 6 (b) above)

6 (f). Your comments are invited on the proposed revisions to the Guidance to Natural England on licensed badger control. Draft revised Guidance can be found at Annex B of the consultation document: see the new section on 'Low Risk Area Badger Disease Control'. The new section header and other revisions to the Guidance have been highlighted in yellow for ease of reference.

The Draft revised Guidance is confusing and/or deliberately misleading. There is a lack of clarity and transparency within the document consistent with the Government's current approach to the implementation of such a controversial policy as the badger culls. Yet, despite previous consultations and refusal to issue data and information despite court rulings to the contrary, the Government appears intent on killing hundreds of thousands of badgers without any evidence to show that their badger cull policy is effective at reducing bTB within the national cattle herd.

6 (g). Do you have any additional comments or approaches which you feel are relevant but not captured by questions 6 (a) to 6 (f)?

Members of our group have considerable experience with badger culling over five years and we know that the Government is failing the farming industry – particularly small-scale beef and dairy farmers – by their focus on culling badgers. Such a policy makes their core voters such as some wealthy landowners happy but it fails to address the problem that is cattle-cattle transmission. FOI requests have shown that implementation of stronger biosecurity measures have not materialised and, as we have shown above ineffective testing regimes continue with cattle from HRAs traded, illegally, into LRAs.

The cost benefit analyses included in the Draft revised Guidelines are based on an understanding that small-scale badger culling will reduce cattle TB. This is unproven and demonstrates the lack of clarity referred to above. Such a consistent use of 'spin' destroys the public's faith in 'wise' governance that, instead, prefers to pander to prejudice.

Finally, the cull has opened the door to bullying and intimidation by powerful pro-cull lobbyists on vulnerable landowners who are not willing to be part of the cull. Turning a blind eye to such a divisive policy that has created much ill-feeling in small rural communities is a disgrace on the part of Government