

## **THE WILDLIFE TRUST'S RESPONSE TO GOVERNMENT BOVINE TB CONSULTATION**

### **TB Testing**

**1. Do you support the proposal to introduce mandatory post-movement testing of cattle moving from higher TB risk regions of Great Britain (the HRA, Edge Areas on six-monthly surveillance testing and Wales) into those parts of the Edge Area where herds are on annual surveillance testing?**

Yes

**Please give reasons for your answer. Where available, please provide supporting evidence. :**

Cattle to cattle transmission is the principle cause of infection and spread of bovine TB making the movement of cattle around the country a significant factor in the spread of the disease.

We welcome a strengthened testing regime, and the acknowledgement of the role that cattle movement plays in passing on the bovine TB. Measures that reduce cattle to cattle transmission are critical to disease control and eradication.

**2. Do you agree with the assumptions and the assessment of costs and benefits in the Regulatory Triage Assessment on introducing post-movement testing to parts of the Edge Area?**

Don't know

**Please give reasons for your answer:**

**3. Do you agree that Defra should revise the current policy for using the more sensitive IFN-g test in the HRA and Edge Area, so that in addition to persistent breakdowns, use of the test is mandatory where the below criterion is met?**

Yes

**Please give reasons for your answer. Where available, please provide supporting evidence:**

As cattle to cattle transmission is the primary cause of bovine TB infection, more mandatory testing is vital. The movement of cattle that may be infected with bovine TB must be brought to an end as quickly as possible.

It is right that the primary focus of action on bovine TB is targeted at cattle infection, transmission and testing.

### **Wildlife Control**

**4 Do you agree with the proposal to cease the issuing of new Badger Disease Control (intensive cull) licences beyond 2022?**

No

**Please give reasons for your answer:**

The Wildlife Trusts want an immediate end to the issuing of Badger Disease Control licenses. Culling does not address the primary cause of outbreaks of bTB which is cattle-to-cattle transmission.

We believe the science used to justify the killing of thousands of badgers every year in the UK is flawed. Since the cull began in 2013 over 140,000 badgers have been killed, approximately 35% of the UK badger population.

Allowing new licenses to be issued means badgers will continue to be shot for at least another four years, in an expanded area. This could lead to a further 130,000 badgers killed by some estimates, meaning the majority of the population of this protected species will have been wiped out.

It is disingenuous of the government to announce a wave of killing that could exceed all culling to date as an end to culling.

**5. Do you agree with the proposal that new Badger Disease Control (intensive cull) licences issued in 2021 and 2022, could, after 2 years of culling, be revoked after a progress evaluation by the CVO?**

No

**Please give reasons for your answer:**

The Wildlife Trusts want an immediate end to the issuing of Badger Disease Control licences. If no new licenses are issued there will be no need for the CVO to revoke new licenses.

We further urge the Government to end the intensive culling of badgers.

The continuation of the cull, whether through existing or new licences is unscientific, inhumane and will lead to local extinctions of badger populations across England.

Ongoing intensive culling of badgers is not compatible with the Government's stated aim in the Consultation paper of "enhancing the environment and biodiversity" and is opposed by the majority of England residents.

**6. Do you agree with the proposal to reduce the initial financial commitment required from the companies prior to application for a Badger Disease Control licence to the cost of three years of culling?**

No

**Please give reasons for your answer:**

The taxpayer should not be expected to pick up the costs of a Badger Cull policy which is ineffective, inhumane and to which the majority are opposed.

We do not agree that Badger Control licences should continue to be issued in 2021 and 2022 as the Government is proposing. The Government should phase out all current Badger Control Licences as quickly as possible

**7 Do you agree with the proposal to restrict Supplementary Badger Cull (SBC) licences to a maximum of two years, prohibit the issuing of SBC licences for previously licensed areas or areas licensed for Badger Disease Control after 2020?**

No

**Please give reasons for your answer:**

The Wildlife Trusts want an immediate end to the issuing of Supplementary Badger Cull licences. All ongoing Supplementary Badger Cull licences should be rapidly phased out.

**Comments on the Guidance to Natural England**

**8. Do you have any comments on the proposed revisions to the Guidance (Annex D in the consultation PDF)?**

None

**Do you have any comments on the proposed revisions to the Guidance (Annex D in the consultation PDF)?**

None

**9. Do you have any other comments?**

The Wildlife Trusts oppose culling and believe the science used to justify the killing of thousands of badgers every year in the UK is flawed. Evidence shows that bTB is primarily a cattle problem, not a wildlife one. The main route of bTB transmission in cattle is between cattle. The cull should be ended now.

**ENDS**