



"Embracing Innovation to Conserve the World's Animal Kingdom."

Bovine TB Programme
Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London
SW1P 3JR

12 March 2018

Dear DEFRA,

Responses to Bovine TB Consultation

Reference:

- A. *"Bovine TB: Consultation on revised guidance for licensing badger control areas"*
- B. *"Bovine TB: consultation on proposals to introduce licensed badger control to prevent the spread of bovine tuberculosis in the Low Risk Area (England)"*

Whenever a species is targeted for culling in the name of reducing bovine Tuberculosis (bTB) in cattle, then it should be based on grounded science – not the persecution of a species based upon poor science, understanding, skewed cost/benefit analysis and bias.

Sadly, the latter characteristics would seem more prevalent to any impartial observer when reviewing the Department for Environment, Food and Rural Affairs' (DEFRA's) record and proposals (at references A and B 'for consultation') going forward for badger culling in the United Kingdom:

- Since 2013, some 35,000 badgers (around 20,000 in 2017) have been culled across licensed zones in the United Kingdom (Gloucestershire, Somerset, Dorset, Cornwall, Devon, Herefordshire, Cheshire and Wiltshire) with no categorical, independent science that proves this slaughter has proportionally reduced incidents of bTB in cattle in the infected areas, and/or the spread of bTB. This includes the lack of evidence to support further culling/expansion from the original 'pilot zones' in Gloucestershire and Somerset for 'high-risk' areas in the west and south west of England:

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".....only 5.7% of all bTB outbreaks have been the direct result of transmission from badgers to cattle. This equally means that 94.3% of all bTB outbreaks come from alternate sources" - [Badger Trust](#)

"It's depressing that the government is pursuing badger culling over such huge areas when the benefits remain so uncertain. Data published today suggest that, after three years of culling, cattle TB in the first cull zones was still no lower than that in uncultured areas" - Prof Rosie Woodroffe, at the Zoological Society of London, "[Huge increase in badger culling will see up-to 33,500 animals shot](#)," The Guardian, 11 September 2017

- The majority of badgers thus far executed in the culling has been by shooting at random (ie. a targeted badger is executed regardless of being proven as a TB carrier, or not). So far, the many badgers thus killed within the licensed culling zones have proven to be TB free:

".....80% of the badgers being culled in England and Wales do not carry TB and vaccination programmes can effectively lower the risk and even prevent these badgers from ever carrying TB" - [Badger Trust](#)

So where is the humanity in continuing such a wanton persecution/execution of more badgers by shooting/culling when such actions lack any credible, scientific backing to continue, let alone expand such inhumane blood-shed?

"Shooting badgers has been condemned as 'inhumane' by both the government's own independent experts and the British Veterinary Association. "But it it's also a disaster for cattle, Britain's farmers and the taxpayer" - Peter Martin, chairman of the Badger Trust, "[Huge increase in badger culling will see up-to 33,500 animals shot](#)," The Guardian, 11 September 2017

- Where is the independent scientific correlation that hotspots for bTB are 'perpetuated' by badgers (which appears to be an unproven assumption behind the



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rationale for randomly targeting badgers for execution)? Therefore, any proposals to expand new licensed zones in the counties of Avon, Berkshire, Derbyshire, Hampshire, Oxfordshire, Shropshire, Staffordshire and Warwickshire (etc.) are currently without any independent scientific credibility. To the impartial observer, such proposals appear to be based upon nothing more than myth, speculation and a bigoted desire to persecute badgers as scape-goats for a cattle disease that could be controlled by other avenues (perhaps less palatable to those that profit from the cattle industry);

If there was a genuine desire to contain bTB in the 'high' and 'low-risk' areas of England, then any impartial observer would first seek to reduce the risk of spread/transfer by eliminating cattle movements that risk bTB transfer and enforce strict cattle herd bio-security measures; ie. more cattle tested for bTB, infected cattle herd quarantine being mandatory and rigorously enforced etc. Such policies should be enacted no matter the potential short-term negative impact and commercial inconvenience to those that seek to profit from unfettered cattle movements and sales into the human food chain (if the eradication of bTB is a genuine cattle industry mission):

"Of the available bovine tuberculosis control strategies, we believe that how frequently cattle are tested and whether or not farms utilise winter housing have the most significant effect on the number of infected cattle...Our modelling provides compelling evidence, for those charged with controlling bovine TB, that investment in increasing the frequency of cattle testing is a far more effective strategy than badger culling" - Professor Matthew Evans, from Queen Mary University of London - [Badger Trust](#)

Trying to continually blame (scapegoat) badgers is a deceit and a cattle industry appeasement/self-delusion of the real risks and range of prevention strategies available to that industry. But, it is far easier to persecute a soft target (badgers) than the industry itself facing hard realities and the potential dent to profiteering it would seem.

Taking the current DEFRA policy to its 'logical' conclusion, would persecuting all badger populations to the point of 100% eradication eliminate bTB? No, it would not – the assumption that targeting badgers will prevail over bTB in cattle herds is clearly flawed. bTB could continue to spread amongst cattle herds, when movements of inadequately tested cattle are permitted within a relatively unfettered environment:

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"It has already been shown in Wales that tighter control on cattle movements, regular and thorough testing has shown a drop of 30% in bTB incidents" - [Badger Trust](#)

"The movement of cattle is a major transmission route for the spread of bovine TB. A study on the role of cattle movements in bTB spread in France concluded that cattle movements were 'essential in the French bTB dynamics' - [Badger Trust](#)

If badgers are to be targeted by DEFRA as the main cause of spreading bTB in cattle, then why not vaccinate badgers (and advance cattle vaccination) in known infected badger populations?

"We want the government to instead prioritise work on vaccines for cattle and also for badgers, as well as on improving testing and supporting landowners to improve on-farm bio-security" – Dorset Wildlife Trust

"vaccination of wild badgers in a naturally infected population results in a statistically significant 73.8% reduction in the incidence of positive results to a badger antibody test for TB" - DEFRA

Of course, this pragmatic approach (and its effectiveness has been acknowledged by DEFRA) would take far more care, humanity, resources and dedication than just randomly executing badgers in large numbers and hoping for positive results with regard to bTB reduction in cattle – but the medium, to long-term gains of vaccination has far more potential scientific certainty than the current short-term (short-sighted) policy of wanton badger execution where the results could at best be described as scientifically 'disappointing.'

In fact, the results of the current badger execution policy could in fact prove to be negative, because of perturbation – where badgers move out of the culling area (due to the distress and alarm caused by inhumane culling) – potentially, any badger carrying TB then spreads TB to potentially disease free badger populations and so the problem is perpetuated and spread - the very opposite of the claimed DEFRA 'rationale' for the badger persecutions by random killings approach.



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In the end, the hard-reality is, that the perceived 'cost-saving' (sic) of a multi-million pound policy that persecutes badgers by indiscriminate culling (despite the licencing over-sight, it's still basically random) will potentially prove ineffective in the medium to long-term – by which point, unfettered cattle movements, lack of comprehensive cattle testing for bTB and the lack of strict bio-security will only prove potentially more difficult and expensive to implement (once the realisation of its necessity overrides the priority to maintain profiteering regardless of the risks).

I was under the hope/impression that the United Kingdom/DEFRA wanted to lead the world and 'enhance environmental and animal welfare standards.' I (naively perhaps) assumed this mission applied to the United Kingdom's wildlife. But clearly, under the current DEFRA policy and proposed expansion, badgers are excluded from such concerns, because the cost-benefit appears to be skewed towards scapegoating badgers regardless of any credible, independent scientific foundation – when other avenues/options clearly exist and offer far more humane alternatives.

Rather than the farming industry itself facing the hard realities of bTB risks and potentially more effective bTB prevention within cattle herds, these avenues of containment/eradication openly available to that industry appear to be continually ignored, seemingly with the complicit support of DEFRA's short-sighted policy and proposed expansion of the continued persecution of badgers.

Yours sincerely,

Stephen Alan Wiggins

Founder of International Wildlife Bond (IWB)

Bibliography

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1. ["Nine areas of England apply to join badger cull,"](#) BBC News, 8 March 2018
2. [Badger Trust](https://www.badger.org.uk/) - <https://www.badger.org.uk/>
3. ["Badger culls,"](#) Born Free Foundation
4. ["Huge increase in badger culling will see up-to 33,500 animals shot,"](#) The Guardian, 11 September 2017

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