

# Public Consultation on Controlling the Spread of Bovine Tuberculosis in Cattle in High Incidence Areas in England: Badger Culling

## Summary of Responses

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## 1 Executive Summary

- 1.1 This report has been prepared by PKF to provide the Department for Environment, Food and Rural Affairs (Defra) with an analysis of responses to the consultation on “*Controlling the Spread of Bovine Tuberculosis in Cattle in High Incidence Areas in England: Badger Culling*” (15 December 2005 – 10 March 2006). The report does not seek to offer an opinion on the comments provided but rather summarises the views that have emerged from the consultation exercise.
- 1.2 The *Government Strategic Framework for the Sustainable Control of Bovine TB in Great Britain* (2005) recognised the importance of the views of stakeholders and wider society in reaching decisions on bovine TB controls and on badger culling in particular. Significant results from the proactive element of the Randomised Badger Culling Trial, combined with other scientific evidence (incl. Irish Four Areas Trial), led the Government to conclude that a consultation was needed to inform a decision.

### Aim and Scope of the Consultation

- 1.3 The twelve week consultation (15 December 2005 – 10 March 2006) aimed to explain the complexities and involve the wider public in the decision making process on badger culling as part of the overall approach to control the spread and achieve a sustained reduction of bovine TB in cattle in England. The purpose of the consultation was to ask for specific views on:
- **The principle:** whether, in light of all available evidence, to cull badgers to help control the spread of bovine TB; and
  - **The delivery options:** the possible ways that a proposed policy to cull badgers could be implemented.
- 1.4 Animal health and welfare is a devolved responsibility and the consultation was specific to the management of bovine TB in England only.

### Analysing the Responses

- 1.5 There were 47,472 responses to the consultation via letter and e-mail. 13 petitions against a cull were also submitted containing 12,100 signatures and 10,000 text messages.
- 1.6 The responses have not been given any weighting and the analysis has been approached by categorising the letters and e-mails into four groups:
- Stakeholder responses from organisations such as charities and businesses (a list of the national stakeholders who responded is at Annex A);
  - Substantive public responses which were lengthy replies answering the majority of the questions in the consultation document;

- Other public responses were short replies mainly focused on the principle; and
  - Campaign responses from members of the public that sent in a letter or e-mail based on a standard letter from one of seven campaigns.
- 1.7 A high proportion of responses (33,129 / 68%) were from campaigns run by wildlife and farming groups. 225 (0.01%) responses were received from stakeholders; 348 (0.01%) were lengthy responses from the public ('substantive public'); and there were 13,770 (29%) 'other public' responses. The majority of responses were from the South West and South East Regions of England.

### The Principle

- 1.8 4% (1,893) of the total number of responses received were in support of using a cull of badgers as part of the approach to cull bovine TB in cattle. The vast majority, 95.6% (45,415) were opposed to a cull and 0.4% (164) of responses were neutral to the proposals. This was reflected in the balance of opinion in the campaign and non-substantive public responses. However, there was a more even split of opinion in both the stakeholder (41% for; 50% against) and substantive public responses (51% for; 44% against).
- 1.9 The main focus of comments whether for or against a cull were focused on the scientific evidence; cattle controls and other measures; addressing disease in cattle and wildlife; and the protected status of the badger.
- 1.10 **Scientific evidence:** 57% of respondents stated that current scientific evidence is inconclusive on the effectiveness of culling in reducing the incidence of bovine TB. 23% of total responses did not believe that the majority of badgers carry bovine TB. However, 22% of responses were concerned that culling badgers locally would lead to an increase in the incidence of bovine TB in cattle due to the effects of badger perturbation.
- 1.11 **Cattle and other measures:** 83% of responses were of the view more effort should be put into controlling the spread of the disease through improving controls on cattle-to-cattle transmissions and biosecurity measures and a further 42% highlighted that efforts could be better directed on such measures. The production of a vaccination for cattle and badgers was seen as important to 53% of respondents. A proportion of responses (30%) were concerned that bovine TB in cattle was due to modern farming methods.
- 1.12 **Cattle and wildlife:** 5% of respondents believed that in order for bovine TB to be eradicated it needs to be addressed in both the cattle and the wildlife reservoir. Some commented on a perceived growth in badger numbers and a connection with the increase in bovine TB.
- 1.13 **Protected status of the badger:** 30% of respondents argued that badgers are protected by law and that therefore a cull would be illegal and a further 26% noted concerns over animal welfare issues.
- 1.14 A detailed breakdown of opinion is given in section 5 of this report.

## Considering the Options for a Culling Policy

- 1.15 In general limited views were provided on the options for a culling policy and, therefore it is not possible to provide meaningful figures to show the balance of opinion. The points below illustrate the varied opinion where comments were provided.
- 1.16 **Delivery:** some responses were of the view that Defra should carry out a cull, not farmers and landowners, while others preferred that state training for culling should be provided by Defra. Some felt that farmers are capable of protecting their own land and should be allowed to do so as they consider appropriate.
- 1.17 **Licensing:** individual licences were considered by some respondents to present a potential significant administrative and bureaucratic burden for Defra and licensees. There was also concern that applicants should be required to provide proof that they have the necessary skills to implement the culling method.
- 1.18 **Area:** there was general concern about potential problems associated with ensuring a high level of participation of landowners/farmers (equally alternative views suggested that participation would not be a problem).
- 1.19 **Disease history:** respondents who commented were keen that if the decision was to cull then there should be supporting evidence from the State Veterinary Service that there exists a connection between herd breakdown and the local badger population.
- 1.20 **Method of culling:** cage trapping and shooting were highlighted by some respondents as the most humane methods of undertaking a cull. Gassing was considered by some to be the most efficient and effective method of culling. Views generally suggested that snares were not an acceptable means of achieving badger capture.
- 1.21 **Disposal:** the opinion from those who commented was that the favoured methods of disposal would be either incineration or burial (but that there are issues in relation to the application of either of these methods).
- 1.22 **Monitoring:** some responses were of the view that the importance of testing as many badgers as possible was particularly important to ensure that a cull is not undertaken of healthy badgers but is targeted.
- 1.23 A detailed breakdown of opinion is given in section 6 of this report.

## 2 Introduction

### The Consultation

- 2.1 From 15 December 2005 to 10 March 2006 the Government held a consultation “*Controlling the Spread of Bovine Tuberculosis in Cattle in High Incidence Areas in England: Badger Culling*”. The consultation sought views on whether or not, in light of all available evidence, to cull badgers to help control bovine TB in cattle in England. In addition to consulting on the Principle, views were also sought on possible ways that a proposed policy to cull badgers could be implemented. Citizens’ Panels were also held as part of the consultation and the conclusions from these are the subject of a separate report.
- 2.2 Badgers are considered to be the main wildlife reservoir for bovine TB in Britain. Results for the proactive part of the Government’s Randomised Badger Culling Trial (RBCT), combined with other scientific evidence, led the Government to conclude that an open consultation was needed to inform a decision on whether or not to introduce badger culling as a measure to control the spread of bovine TB.
- 2.3 The Consultation Document highlighted that Bovine Tuberculosis (bovine TB) is endemic in some parts of Great Britain and is increasing at a rate of 18% a year. The disease has implications for the farming industry, for wildlife, animals and for public health. The Government has introduced cattle measures to reduce the incidence of bovine TB, however the question remains of whether to cull badgers to bring the disease fully under control.
- 2.4 The Government recognises that cattle-to-cattle transmission and badger-to-cattle transmission are both contributors to the high incidence of bovine TB in cattle. The Consultation was launched alongside an announcement of increased measures to control bovine TB and supplement the major programme of cattle controls already in place. The new measures were:
- Pre-movement testing to reduce the spread of bovine TB through cattle movements (introduced on 27 March 2006 for cattle over 15 months old); and
  - Compensation: replacing individual valuations for infected cattle with a table valuation system (introduced from February 2006 and covering 4 cattle diseases including bovine TB).
- 2.5 The Government is also urgently pursuing scientific research into measures to combat bovine TB. This includes continuing research into improved diagnostics, vaccine development and the epidemiology of the disease.

## 3 Methodology

### Respondent Type

3.1 The consultation was open to anyone who wished to respond although within the Consultation Document, Defra identified a number of key stakeholder organisations who were directly invited to give their views. In order to analyse the responses received they have been classified into four categories:

- Stakeholder responses from organisations such as charities and businesses (a list of the national stakeholders who responded is at Appendix I);
- Substantive public responses which were lengthy replies answering the majority of the questions in the consultation document;
- Other public responses were short replies mainly focused on the principle; and
- Campaign responses from members of the public that sent in a letter or e-mail based on a standard letter from one of seven campaigns. Those campaigns identified were:
  - The Royal Society for the Protection of Cruelty to Animals (RSPCA);
  - Secret World Wildlife Rescue;
  - The Coalition of Badger Groups;
  - The Woodland Trust;
  - The Wildlife Trusts;
  - The National Farmers Union; and
  - The National Beef Association.

3.2 Responses were received in a number of formats including letter, e-mail, and petition.

### Approach to Analysis

3.3 The approach to the analysis has been to:

- Identify whether the response is for, against or is neutral to the question of whether a cull of badgers to control bovine TB is an appropriate action;
- Identify the key themes used to support a respondent's position in relation to whether a cull should or should not be undertaken;

- Identify the views of organisations and occupations (where provided) in relation to the question of whether a cull should or should not be undertaken;
  - Identify the respondent's position in relation to the delivery options presented in the Consultation Document should a cull be undertaken;
  - Analyse the responses to all further questions on the practicalities of undertaking a cull; and
  - Identify the geographic location of respondents, where provided, according to Government Office Region.
- 3.4 The content of responses has differed greatly ranging from very detailed, reasoned arguments covering all of the questions in the Consultation Document through to a single sentence stating support for, or opposition to, a cull. It should be noted that responses have been summarised in this report and that the report does not seek to attempt to document each and every view. The report records the key themes arising from consolidation and analysis of the returns. It does not seek to judge, comment or interpret on the key themes arising.
- 3.5 Whilst 47,472 responses have been received the vast majority responded to question 1 only. The responses to questions 2 to 21 are provided mainly by 'stakeholder' (of which 225 have been received) and "substantive public" responses (of which 348 have been received).
- 3.6 There have been a number of submissions provided by the same respondent, for example where an individual sent a campaign response, a more substantive response and added their name to a petition. It was not possible to identify all such multiple responses so these have not been removed from the final figures. There was also some element of duplication, for example e-mails sent twice by the same respondent, which have been removed where possible.
- 3.7 There were also a number of requests by respondents for confidentiality, therefore, all quotes used in this report have been anonymised.

### **Scope of Consultation**

- 3.8 The proposals contained with the Consultation Document apply to England only.
- 3.9 Where views have been provided from Scotland, Wales and Northern Ireland or overseas these have been included within the overall analysis but excluded from the regional analysis presented in Section 4.

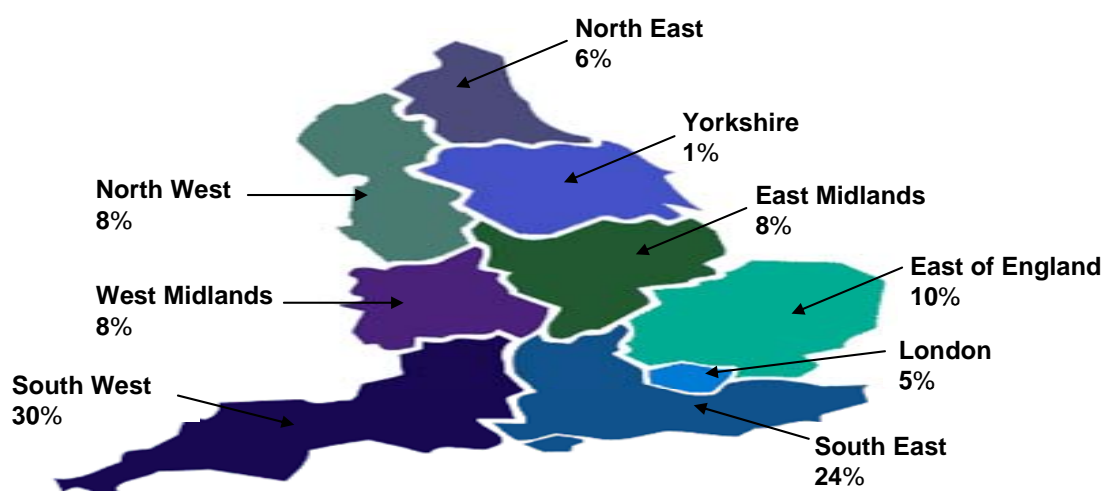
## 4 Overall Analysis

4.1 Public interest in the consultation exercise has been considerable. At the close of the consultation exercise 47,472 responses had been received. Responses were disaggregated according to the identified categories such that:

- 225 'stakeholder' responses were received;
- 348 'substantive public' responses were received;
- 13,770 'other public' responses were received; and
- 33,129 'campaign' responses were received.

4.2 In addition to the above, 13 petitions with approximately 12,100 signatures and 10,000 text messages have been received recording their opposition to the Principle.

4.3 Where responses provided postal addresses (34,024 England only) they were disaggregated into regions for England to illustrate the balance of responses (figure 1):



4.4 Figure 1: Analysis of responses in England where a postal address has been provided

4.5 As can be seen from Figure 1 responses have been received predominantly from the southern regions.

4.6 The above does not represent those responses which did not provide postal addresses or were identified as outside of England (i.e. 13,448 or 28% of responses). These have, however, been included in the overall analysis.

## 5 The Principle

- 5.1 This section of the report summarises the responses received to the primary question of whether a cull should be considered to help control bovine TB in cattle.

**Question 1: In light of the evidence presented as part of this 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?**

- 5.2 The majority of responses sought to answer this question only. Of the total number of responses received only **4%** expressed views in favour of a cull whereas **95.6%** expressed opposition and **0.4%** did not give a view (Table 1)

Table 1: Summary of Views on Principle

Response Category	For		Against		Not Stated	
	Number	%	Number	%	Number	%
Stakeholder (total number of responses: 225)	93	41	113	50	19	9
Substantive public (total number of responses: 348)	178	51	152	44	18	5
Other public (total number of responses: 13,770)	872	6	12,771	93	127	1
Campaign (total number of responses: 33,129)	750	2	32,379	98	-	-
<b>Total</b>	<b>1,893</b>	<b>4</b>	<b>45,415</b>	<b>95.6</b>	<b>164</b>	<b>0.4</b>
<b>Excluding Campaign</b>	<b>1,143</b>	<b>8</b>	<b>13,036</b>	<b>91</b>	<b>164</b>	<b>1</b>

- 5.3 Table 2 provides analysis by Government Office Region of the responses received which provided personal information in relation to the Principle:

Table 2: Summary of Views on Principle (By Government Office Region: England Only)

Government Office Region	For		Against	
	Number	%	Number	%
East Midlands (Total Number of Responses: 2,748)	93	3	2,655	97
East of England (Total Number of Responses: 3,296)	72	2	3,224	98
London (Total Number of Responses: 1,577)	10	1	1,567	99
North East (Total Number of Responses: 530)	14	3	516	97
North West (Total Number of Responses: 2,578)	79	3	2,499	97
South East (Total Number of Responses: 8,250)	250	3	8,000	97
South West (Total Number of Responses: 10,106)	541	5	9,563	95
West Midlands (Total Number of Responses: 2,873)	289	10	2,584	90
Yorkshire and the Humber (Total Number of Responses: 2,068)	52	3	2,016	97
<b>TOTAL (34,026)</b>	<b>1,400</b>	<b>4.1</b>	<b>32,624</b>	<b>95.9</b>

- 5.4 In summary 96% of combined 'campaign' and 'other public' responses were opposed to a cull. Substantive responses, as represented by 'stakeholder' and 'substantive public' responses were more balanced with 47% in favour, 46% opposed to the cull, and 7% neutral to the proposal.
- 5.5 The main themes raised on the principle were in relation to the scientific evidence of the basis for any cull, the role of cattle and badgers in the spread of bovine TB, the transmission of the disease and views on where government's efforts should be focused, for example, vaccines and investigating cattle-to-cattle contact.

### ***Stakeholder Responses***

- 5.6 Of the 'stakeholder' responses received 50% have expressed views opposing a cull. The issues are discussed below.
- 5.7 37% of total stakeholder responses believe that more effort needs to be put into controlling the spread of bovine TB by **improving controls over cattle-to-cattle transmissions and bio-security measures** and that an assessment should first be undertaken of the effectiveness of such measures prior to any cull. Key issues raised were:

- Concerns in relation to Defra's intention of introducing compulsory pre-movement testing of cattle and that if this were to go ahead at the same time as a cull then it would make it impossible to assess the effectiveness of either option. It was considered that only if pre-movement testing is shown to be ineffective should a cull be considered;
- It is noted by Defra's Scientific Advisory Council and others that large scale culling is "*unlikely to be an effective control measure until further control methods to reduce bovine TB have been implemented*". Different views therefore exist on whether the Government should consider isolated measures or a package of measures;
- That the effect of improved bovine TB testing of cattle in Northern Ireland has reduced bovine TB breakdowns by 40% since November 2004;
- That research undertaken by Oxford University and published in 2005, stated that cattle movements "*substantially and consistently outweigh*" all other factors, including badgers, for predicting bovine TB outbreaks. It had also been stated in the House of Commons that 80% of bovine TB outbreaks are caused by cattle; and
- That the current skin test used for the detection of bovine TB in cattle currently misses up to one third of infected animals. Consequently it is argued that there should be more widespread use of the gamma interferon test.

5.8 35% of total stakeholder responses believe the **current scientific evidence is inconclusive on the effectiveness of culling** in reducing the incidence of bovine TB. In particular that:

- The Randomised Badger Culling Trial needs to be completed and analysed prior to any decision being made;
- If the Government's own independent advisory group is not convinced that culling is an effective method, and has stated that the Consultation Document was inaccurate in important aspects, then it is premature to be putting proposals out for consultation that would result in the culling of badgers. This follows the statement made by the Chairman of the Independent Scientific Group which stated that "*I would not be planning a cull at the moment. There is no indication that it might make the situation better, in fact it will almost certainly make it worse*";
- That there is no scientific justification for the assertion that badgers are the main vector for the disease and that the Defra Scientific Advisory Council supports the hypothesis that a substantial proportion of bovine TB in cattle in Great Britain is at present not due to badgers, but is due to other factors such as cattle-to-cattle transmissions. In particular it is noted that the Government is committed to ensuring that its policies are soundly based on scientific evidence;

- That the Krebs Report in 1997 concluded that previous attempts to control bovine TB by culling badgers had not resulted in a significant impact upon the incidence of the disease in cattle; and
  - That the Consultation Document presents a very selective and misleading position in relation to the scientific evidence especially that international experience shows that it is not possible to contain and eradicate bovine TB if its background presence is unaddressed.
- 5.9 32% of total stakeholder responses believed that culling badgers locally would lead to an **increase in the incidences of bovine TB due to the effects of badger perturbation**, including that scientific evidence from the Randomised Badger Culling Trial has shown that culling badgers locally may increase bovine TB in surrounding areas due to perturbation. Whilst proactive culling results in a drop in bovine TB of 19% this reduction is offset by a 29% increase in bovine TB outside of the culling area.
- 5.10 17% of total stakeholder responses expressed the importance of efforts being focused on **producing a vaccination that could be administered to both cattle and badgers** whilst 9% of total stakeholder responses were of the view that culling badgers would be illegal (recognising that there is no test for bovine TB in live badgers) and 8% considered that time and money could be used better in investigating cattle-to-cattle transmission.
- 5.11 9% of total stakeholder responses were concerned that the spread of bovine TB in cattle is not caused by badgers but was **due to modern farming methods**. In particular the process of housing cattle in enclosed barns during the winter months was considered as creating the perfect environment in which bovine TB could survive and spread. Further points included:
- The proposals were compared to the handling of the foot-and-mouth disease crisis and the extensive cattle movements associated with restocking farms;
  - A range of animal welfare issues associated with a cull, including rejection of the claim that it would be in the interests of maintaining a healthy badger population; and
  - That attention should be targeted at measures to improve cattle controls including tighter bovine TB testing regimes, the isolation of bought-in-cattle and the introduction of the gamma interferon testing for large and multiple reactor herds.
- 5.12 Of the 'stakeholder' responses received 41% have expressed views in favour of a cull. The issues are summarised below.
- 5.13 21% of total stakeholder responses believed that in order for bovine TB to be eradicated it needs to be addressed in both cattle and the wildlife reservoir and if culling is needed and advised by experts then it must be done. *"Only by tackling the disease in the main reservoirs (cattle and badger) will effective control of TB be achieved. Without culling, the combined weight of increased cattle controls and an uncontrolled wildlife reservoir of bovine TB*

could potentially destroy the very industries which government policies are trying to protect". Key points made included that:

- Both the **Government and Defra are required by law to control and eliminate bovine TB** and if it remains unchecked, then it is considered that taxpayers will face an estimated £2 billion bovine TB bill over the next 10 years. The Government and Defra should take the lead in implementing a programme of controlling diseased populations as soon as possible;
- Whilst related to delivery, a number of views on the Principle considered that a **farmer's identity should remain confidential** and should not be made available under the Freedom of Information Act. This would allow them protection from any actions undertaken by extreme animal welfare groups;
- **Pre-movement testing is considered to be very expensive** and farmers will only be willing to continue to co-operate with measures that involve testing if action is taken to address the existence of bovine TB in the wildlife reservoir. Further views called into question the effectiveness of the proposed regime of pre-movement testing noting that *"In essence we remain unconvinced of the merits of pre-movement testing in reducing the incidence of bovine TB. We would prefer to see post-movement testing introduced in line with the recommendations of the TB forum and the re-introduction of annual bovine TB testing across the UK"*. Further views suggested that the Government should fund all pre-movement testing; and
- Badger numbers have grown considerably in recent years increasing the number of infected badgers. Consequently badgers **can no longer be considered an endangered species** and legislative protection should be removed that similar legislation, as for deer (including arrangements for closed season) should be introduced to enable local landowners and farmers to take appropriate measures to control their local badger populations.

### **Substantive Public Responses**

5.14 Of the 'substantive public' responses received 44% have expressed views opposing a cull. The key issues raised are described below:

- 30% of total 'substantive public' responses believed that **current scientific evidence is inconclusive on the effectiveness of culling** in reducing the incidence of bovine TB. Views highlighted the absence of definitive outcomes from previous research activity undertaken
- 28% of total 'substantive public' responses believe that **more effort needs to be put into controlling the spread of bovine TB** by improving controls over cattle-to-cattle transmissions and the introduction of bio-security measures. It is highlighted that prior to embarking on a cull an assessment should be made to establish the effectiveness of the introduction of cattle-to-cattle controls and that a cull by itself would be an

ineffectual measure in the control of bovine TB. The current trials taking place in Ireland and the perceived effectiveness of cattle controls in reducing bovine TB were often cited measures;

- 19% of total 'substantive public' responses believe that culling badgers locally would lead to an increase in the incidences of bovine TB due to the effects of **badger perturbation**;
- 15% of total 'substantive public' responses expressed the importance of efforts being focused on **producing a vaccination** that could be administered to both cattle and badgers;
- 8% of total 'substantive public' responses expressed concerns in relation to **animal welfare issues** associated with the cull and the methods of culling used. In particular many respondents noted that: *"there is no established method of culling badgers which could be successfully and humanely used on a large scale"*;
- 7% of total 'substantive public' responses believe that the **time and money invested in investigating the relationship between badgers and the spread of bovine TB has been wasted** and would be better deployed investigating the main cause of the spread which is from cattle-to-cattle: *"The Government has already spent some £34million of taxpayers money over more than 5 years performing 'research' which involved killing some 12,000 badgers. This whole exercise will have been a total waste of money and badgers lives if, having proved that badger culling is not the answer, the Government allows such a cull anyway"*;
- 7% of total 'substantive public' responses **questioned the legality of a cull** as badgers are a protected species under the Badger Protection Act and that a cull would contravene the Bern Convention. *"Badgers have been subject to legal protection for many years and it is illogical for the Government now to propose a course of action which runs directly counter to the original reasons for such protective legislation, unless it is accompanied with clear, unambiguous evidence that the proposed action is in the wider interest of all sections of community"*;
- 9% of total 'substantive public' responses suggested that the spread of bovine TB was **not linked to badgers but due to modern farming methods**. *"All this intense farming, keeping animals in during the winter months, is hardly healthy for the animals.....Maybe animals should not be transported all over the country as frequently as they are."* Similar points were made in relation to the housing of cattle during winter months creating the perfect environment for the spread of bovine TB; and
- 5% of total 'substantive public' responses **issued opinions on the Government and Defra**, mainly in relation to the requirement for the Government/Defra to base their decision on robust evidence and *"sound science"*. It was suggested the Government needed to take a firm line with the farmers lobby: *"If the Government does not take a firm stand*

*against the farmers, and make the above policies based on their commitments to 'sound science' and the results of their RBCT research".*

- Other issues raised included:
  - a. Analogies to the foot-and-mouth crisis and that this exacerbates the scale of the current bovine TB problem;
  - b. That badgers are not the only wild species carrying bovine TB and questions over whether the entire wildlife reservoir would need to be targeted if a cull of badgers proves ineffective;
  - c. That the majority of badgers have been shown not to carry bovine TB; and
  - d. That the implementation of a cull could encourage illegal badger baiting.

5.15 Of the 'substantive public' responses received 51% have expressed views in favour of a cull. Key issues include:

- 25% of total 'substantive public' responses believe that **badger culling is required alongside improved cattle-to-cattle controls and bio security methods**. It was considered that without tackling the wildlife reservoir it was unacceptable to expect farmers to test cattle before movement: *"..what is the point in culling cows every summer when they become infected after a turn out and not tackling the problem on both fronts"*, and also that there is: *"..no other way than to mount a badger cull alongside TB testing and culling of cattle."*
- 12% of total 'substantive public' responses issued **opinions on both the Government and Defra, in particular that it is the responsibility of the Government and Defra** to take actions to ensure the control of bovine TB. One respondent was of the view that *"the Government has a duty to do what is required to control this dreadful disease, it is tragic for the farmers and their cattle as well as badgers"* It was also considered that Defra should fund any actions necessary and that difficulty in funding the research programmes should not be considered an excuse for inaction;
- 5% of total 'substantive public' responses believed a **badger cull would be of benefit to the badger population by ensuring a healthy population** and would prevent the suffering of those badgers infected with bovine TB. It was considered that if bovine TB is not tackled within badgers it leaves them to *"...suffer a slow and debilitating death."*; and
- 2% of total 'substantive public' responses make a **comparison between the bovine TB problem and the foot-and-mouth crisis**: *"This (bovine TB) is in some ways little different, in terms of stress levels, to foot-and-mouth disease except the stress from the bovine TB threat will last much longer"* and *"..this is a slow burning foot-and-mouth with more devastating effects taking its toll."* It was suggested that action should be taken as a

priority to ensure that controls of bovine TB are established as soon as possible.

- Other issues raised included:
  - a. The need to work towards finding a vaccine to prevent the disease in cattle and badgers;
  - b. Criticisms of the effectiveness of the current skin test detection method;
  - c. The belief that badgers are more highly valued than cattle;
  - d. Concerns over farmers becoming targets for animal welfare activists and the need for exemptions from the Freedom of Information Act; and
  - e. A range of opinions on the actions taken by animal welfare groups lobbying against a cull.

### ***Other Public Responses***

5.16 Of the 'other public' responses received 93% have expressed views opposing a cull. The key issues raised include:

- 45% of total 'other public' responses suggested that efforts should be **focused on improving cattle controls and bio-security methods** before a cull is introduced;
- 37% of total 'other public' responses raised **the issue of lack of scientific evidence** proving the effectiveness, or otherwise, of a badger cull in preventing the spread of bovine TB amongst cattle. Most responses did not seek to highlight specific examples;
- 15% of total 'other public' responses raised concerns over **animal welfare issues** associated with the cull and the methods proposed;
- 14% of total 'other public' responses noted the importance of efforts focused on **producing a vaccination** that could be administered to cattle and badgers;
- 13% of total 'other public' responses believed that culling badgers locally would lead to an increase in the incidences of bovine TB due to the effects of **badger perturbation**;
- 8% of total 'other public' responses questioned the **legality of a cull** in light of the Badger Protection Act and the Bern Convention;
- 8% of total 'other public' responses questioned **the role of intensive modern farming methods** in encouraging the spread of bovine TB, in particular, the practice of keeping cattle enclosed for long periods of time which fostered an environment which was ideal for the spread of bovine TB;

- 8% of total 'other public' responses made **reference to the foot-and-mouth crisis and noted analogies to the previous crisis**. Comments made by the veterinary profession noted that increased cattle movements resulting from the restocking of farms had led to an increase in the spread of bovine TB to previously uninfected areas. It was suggested that the Government response to foot-and-mouth, involving the culling of thousands of cattle, was an overreaction and that similar actions should not be repeated with badgers;
- 7% of total 'other public' responses believed that the time and money invested in investigating the relationship between badgers and the spread of bovine TB may have been better deployed in investigating the main cause of the spread which is thought to be through transmission from cattle-to-cattle;
- 6% of total 'other public' responses expressed **opinions on farmers and the farming community**, in particular that the farmers community appeared to be unwilling to accept responsibility for the problem of bovine TB incidence in cattle;
- 6% of total 'other public' responses stated that **badgers catch tuberculosis from cattle** and that therefore a cull would persecute the victim;
- 5% of total 'other public' responses **criticised the current skin test used for the detection method for bovine TB** and a belief that greater use should be made of the gamma interferon test;
- 4% of total 'other public' responses expressed views on the Government and Defra noting that both were being **unduly influenced by the excessive pressure from farmers lobby** groups;
- 4% of total 'other public' responses believed that **badgers were being treated as a "scapegoat"** for the spread of bovine TB and that the problem was with the treatment of cattle and that the badger was being unfairly targeted as they were not the only animal known to carry bovine TB; and
- 3% of total 'other public' responses stated that **most badgers do not carry bovine TB** and that it was therefore inappropriate to carry out a cull resulting in large numbers of healthy badgers being culled.
- Other issues raised included:
  - a. Concerns over the spread of human TB in the UK due to the high levels of immigration;
  - b. That the cull will encourage illegal badger baiting and that the badger is an important native species; and
  - c. That badgers are not the only wildlife reservoir of tuberculosis.

- 5.17 Of the 'other public' responses received 6% have expressed views in favour of a cull. Key issues raised include:
- 3% of total 'other public' responses believe that for measures to be effective **then controls need to be implemented to address the problem in both the cattle and wildlife populations** as the introduction of cattle controls alone would be ineffective;
  - 1% of total 'other public' responses raised the issue of the **costs involved in controlling bovine TB** for farmers in relation to cattle controls and loss of income;
  - 1% of total 'other public' responses believed that the cull needs to be **controlled and administered by Defra or agents of Defra** in order for it to be effective; and
  - 1% of total 'other public' responses believed that a cull would also be beneficial on **animal welfare grounds** as it would reduce the suffering of the infected badger population.
  - Other issues raised included:
    - a. Comparison was made with the foot and mouth crisis;
    - b. That animal rights groups are ignoring the suffering caused to cattle by bovine TB and have a "*utopian idea of the world*"; and
    - c. That there are high financial and emotional costs to farmers that are affected by a bovine TB herd breakdown.

### ***Campaign Responses***

- 5.18 Campaign responses did not generally comment on issues relating to the options for a culling policy but rather focused on the principle question of whether or not a cull should be undertaken. Copies of the standard campaign responses are included at Appendix II.
- 5.19 Of the campaign responses received 98% have expressed views opposing a cull. The key points covered in campaign letters were:
- That efforts should be focused on improving cattle controls and bio-security methods before a cull is introduced;
  - The importance of efforts being focused on **producing a vaccination** that could be administered to both cattle and badgers;
  - The **lack of scientific evidence** proving the effectiveness, or otherwise, of a badger cull in preventing the spread of bovine TB amongst cattle. Most responses did not seek to highlight specific examples;
  - That the time and money invested in investigating the relationship between badgers and the spread of bovine TB may have been better deployed in investigating the main cause of the spread which is thought to be through transmission from cattle-to-cattle;

- Questions over the **legality of a cull** in light of the Badger Protection Act and the Bern Convention;
  - The **role of intensive modern farming methods** in encouraging the spread of bovine TB, in particular, the practice of keeping cattle enclosed for long periods of time which fostered an environment which was ideal for the spread of bovine TB;
  - Reference to the **foot-and-mouth crisis**, in particular it was suggested that the Government response to foot-and-mouth involving the culling of thousands of cattle, was an overreaction and that similar actions should not be repeated with badgers;
  - It was noted that **most badgers do not carry bovine TB** and that it was therefore inappropriate to carry out a cull resulting in large numbers of healthy badgers being culled;
  - The **current skin test used for the detection method for bovine TB** was criticised and a view expressed that greater use should be made of the gamma interferon test;
  - Concerns were raised over **animal welfare issues** associated with the cull and the methods proposed;
  - It was believed that culling badgers locally would lead to an increase in the incidences of bovine TB due to the effects of **badger perturbation**; and
  - That **badgers were being treated as a “scapegoat”** for the spread of bovine TB and that the problem was with the treatment of cattle and that the badger was being unfairly targeted as they were not the only animal known to carry bovine TB.
- 5.20 In addition to the above, 13 petitions were received opposing the cull. In total there were approximately 12,100 signatures and 10,000 text messages.
- 5.21 Of the ‘campaign’ responses received 2% have expressed views in favour of a cull. Key issues were:
- A fear of a backlash from animal welfare activists; and
  - Culling should not be the farmers’ responsibility.

## 6 Considering the Options for a Culling Policy

6.1 This section of the report summarises the views expressed during the consultation on the specific delivery options.

### *Partial Regulatory Impact Assessment*

**Q2. Comments are invited on the options considered and the costs and assumptions made in the Partial Regulatory Impact Assessment.**

6.2 Annex B of the Consultation Document was a Partial Regulatory Impact Assessment (RIA) was included setting out the costs and benefits of badger management as a component of bovine TB control in England.

6.3 Respondents were also asked for their views on the assumptions underpinning the Partial RIA and the costs and benefits associated with the options. In particular it was questioned **why so much work had been undertaken on a Cost Benefit Analysis and Partial RIA** without the benefit of the results of the proactive culling trial.

6.4 Specific comments and challenges to the assumptions in the Partial RIA were that:

- **50% of all confirmed bovine TB** incidents arise from badger-to-cattle transmission. In particular it was considered this **assumption contradicts scientific evidence**;
- Assumptions regarding the **efficiency of the proposed culling methods** were challenged, in particular that the RBCT cages were less than half as efficient as Defra's proposed option of restraints. The ISG has cited that the reference to 20%-60% culling efficiency is totally misleading as reflected in the following quote: *"We feel that the costs described in the RIA are in some cases inaccurate, and based on nothing more than misinformed assumptions. In view of the fact that the only costs associated with the RBCT cage trapping have been established, we would question other aspects of the RIA which apparently use hypothetical costs....Therefore we consider it unnecessary to comment further on the RIA until such a time as it has been reviewed and more accurate set of data used."*;
- That transmissions **can be reduced in proportion to a reduction in badger populations**. In particular it is quoted that the **findings of the Wilmore Review** provide evidence to the contrary, in that: *"there is evidence that prevalence of bovine TB in the badger population is not related to the density of the badgers and culling them leads to social perturbation"*; and
- A number of **concerns were expressed in relation to paragraphs 13 and 22 of the Partial RIA** which noted that a decision about a badger culling policy may be introduced because of *"the need to win cooperation with farmers on introducing movement testing and compensation, and the*

*wider objective of industry over time bearing a progressively greater share of the costs of bovine TB controls". It was questioned whether a cull would be introduced merely as a quid-pro-quo to the farming industry rather than relying on objective scientific grounds.*

### **Delivery Options**

- 6.5 With regard to the options proposed in the Consultation Document were a cull to be undertaken the following views were provided (summarised in Table 3 below).

Table 3: Views on Options Presented in the Consultation Document

Response Category	Individual Licensing		General Cull		Targeted Cull	
	Number	%	Number	%	Number	%
Key Stakeholder (total number of responses: 225)	0	0	11	5	2	1
Substantive public (total number of responses: 348)	8	2	7	2	11	3
Other public (total number of responses: 13,770)	7	0.0005	6	0.0005	6	0.0005
TOTAL (14,343)	15	0.1	24	0.17	19	0.13

### **Stakeholder Responses**

- 6.6 From the 51% 'stakeholder' responses received expressing views on the issues associated with introducing a cull, the following comments were made:
- Were a general cull to be considered the most favourable option would be for a State controlled cull with Defra taking a central co-ordinating role;
  - The **option of no badger management** should be considered. The rationale provided for no badger management is that there is a lack of scientific evidence to validate the effectiveness of a cull and that until this was better understood it would be advantageous to concentrate on cattle-to-cattle controls;
  - There is **criticism of the outcome from the RBCT and the approach adopted**. It was suggested that a more balanced approach should have been adopted that dealt equally critically with other relevant evidence that would influence outcomes. It is also considered that the results of the RBCT receive interpretation beyond its capacity;

- Throughout the Consultation Document and previous papers on the subject of bovine TB and badgers, **the potential problems that are associated with culling** (in particular the likelihood of perturbation, the effect of non compliance of landowners and potential for saboteurs) are treated with ‘suspicion’ and **all but disregarded in assessing** the practicalities of implementing a cull;
- **10 years is a suitable period** over which to **evaluate costs** enabling the possibilities and uncertainties set out in the RIA to be assessed. However, it was **unacceptable to assume that benefits will accrue over 10 years** when strategies have been implemented for, at most, only 5 years;
- There was a range of **issues associated with farmer/landowner participation** and that access to their land would be refused were a cull to be attempted. It would therefore be problematic to gain access to land to carry out a cull with a coverage considered effective;
- There was a belief that in order for the cull to be effective **Defra would have to play a central role in coordinating and administering the process** and it was not appropriate to devolve responsibility to farmers/landowners; and
- With regard to the options proposed, the ISG claim that two of the proposals (notably the issue of licences and a targeted cull) would “seriously worsen” the bovine TB situation in England and that the third option (a general cull) had massively underestimated the scale of culling required to take effective bovine TB action.

### ***Substantive Public Responses***

6.7 From the 39% ‘substantive public’ responses received that commented on this question, the following themes were raised:

- It was believed that the **cull should be coordinated and controlled by Defra officials**: “It is clear that without substantial help from the Government, farmers will not on their own, be able to sustain the organisation or momentum to cull the number of badgers necessary to achieve a satisfactory result”, and that: “The culling should be the responsibility of Defra and complete anonymity of the farmers concerned should be maintained to protect them from attacks from the terrorists in the animal rights groups”;
- It was considered that culling should not be the responsibility of farmers with a number of reasons cited, including a fear of backlash from animal welfare activists through to the impracticalities of monitoring a cull;
- The belief that a targeted cull would be ineffective due to the effects of badger perturbation; and
- That a general cull would be unpopular as it would result in a complete extermination of badgers in a given area.

### Other Public Responses

- 6.8 Very few 'other public' responses sought to answer this question. Where comments were made they noted that farmers should not be given responsibility for undertaking a cull but that the cull should be undertaken by a professional organisation.

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

### Q3. Under what circumstances should the Government grant licences to cull badgers for the purpose of preventing the spread of bovine TB under the Protection of Badgers Act 1992?

- 6.9 The comments in relation to the circumstances in which the Government should consider granting licences to cull badgers are highlighted below.

### Stakeholder Responses

- 6.10 From the 47% 'stakeholder' responses received that commented on this question, the following comments were made:

- That until it has been scientifically proven that badger culling will aid the eradication of bovine TB, then the **support for the granting of general licences will not be achieved** as there will be insufficient evidence on which to reach conclusions. If culling is to be introduced and licences issued they should not be granted unless there is conclusive proof that the herd breakdown has been caused by the cattle associating with infected badgers;
- A general cull is **not considered to be a viable option, unacceptable** and contrary to considered obligations under the Bern Convention;
- That the **granting of licences would mark a change in government policy** as to date it has been the policy of successive governments since 1975 not to issue licences to farmers and landowners. It was highlighted that the issue of licences would compromise the ability to enforce the Protection of Badgers Act 1992;
- That the **Protection of Badgers Act allows badgers to be killed only for the purposes of disease control** and that, therefore, Defra only has the right to issue licences so that individual infected badgers can be killed;
- A number of responses were received that **registered general objection to the issuing of individual licences**. Specific points included that "*We are opposed to the concept of issuing individual licences to farmers to cull badgers. The process of administering large numbers of licence applications would add to significant bureaucratic stress. Defra must be involved, to assist with the planning, organisation and administration of culling, as disease control is not solely the responsibility of farmers and landowners, but the responsibility of all stakeholders including Defra*"; and

- A number of responses believed that **area licences over hotspot areas** would be the most appropriate proposal and that the process should be **administered and controlled by Defra**.

### ***Substantive Public Responses***

6.11 From the 39% 'substantive public' responses that commented on this question, the following key issues were raised:

- **That licences should not be granted under any circumstances** and that such a policy would lead to badger perturbation and a worsening of the problem;
- Licences should only be granted for the culling of badgers where the farm has **supporting evidence from the State Veterinary Service** that badgers are implicated in the breakdown in their farm and that the farmer (or contractor) has received training in humane methods of badger control;
- If **badgers in the area are found to have bovine TB they should be culled** and the cattle tested for bovine TB also culled if they are reactors.
- Badger culling should only be for the purpose of preventing the spread of disease and that **only positively infected farms should be included** in any cull;
- A number of responses believed that **area licences over hotspot areas** would be the most appropriate proposal and that the process should be **administered and controlled by Defra**; and
- It was considered that there is **data held by farms on the record of bovine TB infection** within a herd and consequently a request from a farm manager should be enough to grant permission to cull badgers.

### ***Other Public Responses***

6.12 Of the 0.3% 'other public' responses that addressed this issue, the predominant theme was that area licences would be appropriate and the importance of protecting farmers identities was emphasised.

### ***General cull***

#### **Q4. What qualifying geographic criteria would be appropriate, achievable and reasonably likely to be an effective disease control measure?**

6.13 As with other questions the majority of responses were received from stakeholders and substantive public comment in relation to this question. The key issues raised are summarised below.

### ***Stakeholder Responses***

6.14 From the 47% 'stakeholder' responses that commented on this question the following comments were made:

- The **issue of badger perturbation is central to any assessment of the appropriate geographic area**, in particular that without natural boundaries to prevent movement it would be problematic to cover a sufficient area and that the effect of any cull would lead to other non-infected areas becoming infected;
- Any cull would need to be state controlled and require all landowners and farmers to participate;
- The general killing of badgers over a designated area, which would lead to the extermination of the species in that area, would be furthermore totally unacceptable to the public on both a moral and conservation basis. It was considered that it would be grossly uneconomical, impossible to apply, contravene the Bern Convention, and would not solve the problem of bovine TB; and
- The **ISG has stated that badgers would need to be culled over a very large geographically isolated area** (in excess of 300sq km) and that this criterion is unlikely to be met due to issues of landowner cooperation.

### ***Substantive Public Responses***

6.15 From the 34% ‘substantive public’ responses that commented on this question, the following comments were made:

- For the cull to have the desired effects, and prevent badger perturbation, **the required area would have to be very large** and that it is very difficult to ensure co-operation of all necessary landowners and farmers; and
- That **the cull should be focused on infected farms** and that to limit the effects of perturbation gassing should be used as the method of culling.

### **Q5. How could farmers ensure sufficient coverage to deliver a sustained cull over a large area?**

6.16 As with other questions the majority of responses were received from key stakeholders and substantive public comment in relation to this question. The key issues raised are summarised below.

### ***Stakeholder Responses***

6.17 From the 42% ‘stakeholder’ responses that commented on this question, the following comments were made:

- Achieving the **full compliance by all landowners within a sufficient area to enable a cull to be effective is considered unlikely**. It was noted that this would render farmer led landscape attempts to cull badgers to control bovine TB in cattle unworkable due to the effects of badger perturbation. There was also no indication within the Consultation Document that farmers would be willing to undertake a large scale and repeated exercise and that, although the ISG have stated that during the RBCT full compliance was achieved over approximately 55% to 95% of

land, if this was considered indicative of attitudes it would be unlikely to achieve sufficient compliance;

- **Culling should not be the responsibility of farmers** but undertaken by properly trained Defra operatives;
- It was considered doubtful as to whether one farmer or landowner would be able to persuade 75% of the surrounding landowners to allow culling to take place on their land. This would also expose farmers as potential targets for animal rights activists. It was noted that the National Farmers Union (NFU) has recently undertaken a survey of members in the South West and West Midlands to ascertain what level of involvement farmers would be prepared to accept if different culling methods were employed. Results show that 45% of respondents were prepared to be part of a management group, 32% were definitely prepared to personally engage in a cull on their land and a further 33% would probably participate; and
- For there to be effective farmer co-operation and involvement then the only option that would be acceptable would be if gassing were to be employed in an area under licence.

### **Substantive Public Responses**

6.18 From the 36% 'substantive public' responses that commented on this question the following comments were made:

- That the issues associated with large scale cooperation to make a licensed cull effective would present a barrier to effective implementation of measures and that even where implemented this could still be ineffective due to the effects of badger perturbation. In particular it was noted that: *"I cannot see cooperation, which would need to be continuous over a long period of time, between farmers with differing views on the seriousness of bovine TB to their particular enterprise. I believe that perturbation would be a serious consequence of this option"*. It was also noted that: *"Farmers are not constrained by working hours or travelling time, so will be efficient in their methods of badger control. However, problems could arise if the implicated sett(s) is/are located on land where the consent of the landowner could not be achieved."*; and
- It should be **left to the local farmers' judgement** on the actions appropriate to eliminate bovine TB and that in particular, the Government and Defra should: *"Let the common sense of farmers dictate, they know where the trouble lies let them deal with it."*

### **Targeted cull**

## **Q6. What qualifying disease history would be appropriate?**

6.19 As with other questions the majority of responses were received from key stakeholders and substantive public comment in relation to this question. The key issues raised are summarised below.

### *Stakeholder Responses*

6.20 From the 39% 'stakeholder' responses that commented on this question, the following comments were made:

- That given the poor sensitivity of the skin (tuberculin) test in cattle, and knowledge that a significant proportion of persistent herd breakdowns are due to cattle based factors, **herd disease history can only be considered an ambiguous and arbitrary variable on which to base the decision to cull badgers**. There does not, therefore, exist an appropriate qualifying disease history upon which to justify a cull;
- **Supporting evidence from the State Veterinary Service (SVS)** that badgers are implicated in the breakdown of their area should be required;
- That there **existed no disease history that would justify culling badgers** until improved surveillance for, and control of, the disease in cattle is implemented; and
- That **issuing licences to kill badgers would be the wrong policy altogether** and would need to be tightly controlled and monitored in order to prevent increased badger baiting.

### *Substantive Public Responses*

6.21 From the 33% "substantive public" responses that commented on this question, the following points were made:

- That those farms on **short interval tests** at the time of the commencement of the cull, and for **farms subsequently found with a reactor with visible lesions**, should form the basis of the necessary qualifying disease history;
- Where a **farm has had a bovine TB breakdown, then it would be appropriate for badger culling**. For example: "One strike and the badger is out", and: "The vets probably know best but I would think that if cattle had been brought onto a holding, once six months had elapsed if there is a TB breakdown, the cause would be fairly obvious"; and
- **Supporting evidence from the State Veterinary Service** that badgers are implicated in the breakdown of their area should be required.

## **Q7. What could be included in the criteria to define those farmers eligible for a licence to cull badgers?**

6.22 As with other questions the majority of responses that commented on this question were received from key stakeholders and substantive public comment in relation to this question. The key issues raised are summarised below.

### *Stakeholder Responses*

6.23 From the 39% of 'stakeholder' responses that commented on this question, the following comments were made:

- That if individual licences were to be issued then there **would need to be identity cards issued so that it was able to be verified** that the licensee was acting on behalf of Defra; and
- That applicants must be required to provide scientific proof that badgers have resulted in herd breakdown and that the applicants were able to demonstrate the necessary skills to implement the chosen method of culling. It was considered unlikely that many of the applicants would be able to satisfy the criteria required (whatever these may be) and that consequently a **State controlled cull would prove to be the only viable option.**

6.24 The majority of 'stakeholder' responses on this question made more general comments around the issue of licensing rather than the criteria. The key themes are highlighted below:

- Until it has been scientifically proven that badger culling will aid in the eradication of bovine TB then **support for the granting of general licences would not be achievable;**
- The suggestion of 1km to 3km of land from the boundary, the requirement for five years of culling and the need for 75% of land to **be under compliance were considered to be completely arbitrary** and did not have a reasonable basis in science or indeed any other valid source of support. It was noted that the adoption of the criteria as illustrated, without a rational basis, would run contrary to the Government's desire for an evidence based policy;
- Any **culling should not be carried out by individual farmers** but should be controlled and co-ordinated by Defra officials and their agents;
- **Area licences would be preferable to individual licences** to avoid the need for the naming of individuals. Licences over specific areas could be granted after consultation between Defra and local farmers and landowners;
- Defra should not leave the implementation and administration of a cull to farmers/landowners and it was considered **essential that Defra plays an active role** in any cull undertaken; and
- Placing the responsibility on farmers to manage badger populations would lead to **culling being used as an alternative to the establishment of improved bio security measures.** A consequence of this would be the inhumane eradication of badgers.

### ***Substantive Public Responses***

6.25 From the 32% 'substantive public' responses that gave a view on this question the following comments were made:

- A **general licence** should be issued to all farmers in one or two year testing parishes in order to reduce bureaucracy associated with the issuing of individual licences;
- **Financial loss alone was sufficient criteria** to form the basis of the award of licences; and
- An assessment of all individuals undertaking the cull would be required to ensure they have the necessary competences or, alternatively, that they should be licensed professional pest control operatives.

**Q8. 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 the holding? If not, what might be achievable and reasonable?**

6.26 As with other questions the majority of responses were received from key stakeholders and substantive public comment in relation to this question. The key issues raised are summarised below.

### ***Stakeholder Responses***

6.27 From the 35% 'stakeholder' responses that commented on this question the following key points were made:

- That **answers to this question can only be conjecture**. It was highlighted that criteria of 75% compliance of land, 1km from holdings boundary is arbitrary and unsubstantiated. It was noted that without evidence to support the defined coverage it is impossible to assess its reasonableness;
- That it would rarely be possible, and indeed **extremely difficult to monitor the effectiveness of the coverage proposed** and consequently that the use of farmers to carry out culling should be discounted;
- It was emphasised that the **NFU is currently undertaking a survey to establish farmer participation numbers** and the results of this will provide a good indicator;
- For a cull to be effective, and for the coverage areas to be successful, the process of planning, implementing and monitoring a cull **would require Defra involvement**; and
- **Not all farmers and landowners would wish to participate** and that consequently the necessary coverage would not be able to be achieved.

### ***Substantive Public Responses***

6.28 From the 33% 'substantive public' responses that commented on this question, the following comments were made:

- That the recruitment of neighbours and gamekeepers would not be a problem;

- That the 75% coverage would not be enough to stop the effects of badger perturbation; and
- That it would be completely impractical to believe that cooperation would be achieved on a wide scale due to the contentious nature of culling and the differing views of farmers and landowners.

**Q9. 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?**

6.29 As with other questions the majority of responses were received from key stakeholders and substantive public comment in relation to this question. The key issues raised are summarised below.

### ***Stakeholder responses***

6.30 From the 32% 'stakeholder' responses that commented on this question the following opinions were given:

- That small groups in a local area being managed by an area group would be an effective means of undertaking any cull;
- That there were **problems of ensuring co-ordination**. In particular it was noted that: "...some individual farmers would be very able to do this but a co-operative arrangement over a large area of land for this length of time is most unlikely to be achieved. Ineffective culling will spread disease and make the situation worse";
- If farmers were to be given responsibility for any cull then there would be **a range of administration difficulties** both for Defra and those participating that would need to be overcome. Examples include where a farmer is taken ill, retires or has a change of heart over the effectiveness of a cull or alternatively neighbouring landowners change with the new owners expressing different views to the previous incumbents;
- It is not possible to set a given area for a cull **as every situation must be evaluated individually to ascertain the coverage** required. It was considered that local knowledge should be used as a basis upon which to establish an appropriate area; and
- The **area would need to be in excess of 300sq km** and that this size of area would not be possible due to issues of participation.

### ***Substantive Public Responses***

6.31 From the 32% 'substantive public' responses that commented on this question the following comments were made:

- That in relation to the coverage: "the area covered consistently would be small, **typically neighbouring beef/diary enterprises would be keen whilst arable and sheep farms may be unwilling to participate**". The

nature of farming undertaken could therefore affect the willingness of participants and level of co-operation;

- That irrespective of the definitions that are applied there is **no area that can be considered to be a manageable size** because it is neither practical or feasible; and
- That **farmers are more than capable of protecting their own land** due to it being crucial for their livelihood. As such farmers would co-ordinate, or not, where measures were identified as being necessary.

### *Methods of culling*

#### **Q10. Are there other methods of culling which should be considered?**

6.32 As with other questions the majority of responses were received from key stakeholders and substantive public comment in relation to this question. The key issues raised are summarised below,.

### *Stakeholder Responses*

6.33 'Stakeholder' responses did not suggest other culling methods. Comments from the 36% 'stakeholder' responses that gave an opinion on the question focused on the suitability of methods proposed in the Consultation Document, upon which the following comments were made:

- Views expressed a **wide range of animal welfare issues** associated with the method of culling, noting that should it be necessary to undertake a cull then it should be undertaken in a humane manner. Cage trapping and shooting were considered the most humane method;
- That **all methods being considered by the consultation are impractical** and likely to be ineffective due to problems of landowner participation and the efficiency of the culling methods;
- Whilst cage trapping and shooting were considered to be the most humane means of undertaking a cull, **gassing was the most effective means** of ensuring a successful cull as it would ensure that all of the badgers within a sett were destroyed; and
- That there was a requirement for a closed season on culling.

### *Substantive Public Responses*

6.34 From the 36% 'substantive public' responses that commented on this question the following comments were made:

- Gassing would be the most efficient method of undertaking a cull;
- There was no established method of culling badgers which could be successfully and humanely used on such a large scale; and
- The use of poison as a potential culling method was raised.

### Other Public Responses

- 6.35 Unlike prior questions in relation to the delivery options, discussion on the alternative methods of undertaking a cull raised a number of views from 'other public' respondents (although still very few in relation to the overall volume of responses received). Of those 'other public' responses received the majority considered that **all of the proposed methods of undertaking a cull are cruel and not suitable due to animal welfare issues.**

#### Q11. Is gassing appropriate for use under licence by groups of farmers, landowners and their agents?

- 6.36 As this question was a closed question, and can be quantified, responses to this question are shown in Table 4 below.

Table 4: Views on the Appropriateness of Gassing

Response Category	Yes		No		Not Stated	
	Number	%	Number	%	Number	%
Key Stakeholder (total number of responses: 225)	46	23	30	13	149	67
Substantive public (total number of responses: 348)	91	26	34	10	223	64
Other public (total number of responses: 13,770)	69	0.01	1	0	13,700	99.9
TOTAL (14,343)	206	1.44	65	0.45	14,072	98.1

- 6.37 The comments regarding the appropriateness of gassing as a method of culling are summarised below.

### Stakeholder Responses

- 6.38 From the 40% 'stakeholder responses' that commented on this question, 60% considered gassing an appropriate method of culling. It was argued that it is the most efficient means of undertaking a cull. Of the 40% of stakeholders stating views against the use of gas the following key points were highlighted:

- That **gassing was incapable of being used to cull badgers in their setts without causing distress or injury to the badger.** It was noted that the use of gas was banned in 1982 due to it being considered both inhumane and ineffective as it was not guaranteed to kill all of the inhabitants of setts; and
- With regard to the views of those that supported the use of **gas as a means of undertaking a cull it was suggested that this was the only effective method** as it was easier for farmers to implement, could be

undertaken during the day when badgers are asleep in setts, that it enables large areas to be culled quickly and that it avoids any issues associated with disposal.

### **Substantive Public Responses**

6.39 From the 37% 'substantive public' responses that commented on this question the following points were made:

- **Gassing would be the most efficient and effective method of culling** as farmers have the equipment readily available to carry out a cull and that there is no need for disposal costs as best practice would suggest leaving the badger in the sett; and
- An alternative view was that the **effectiveness of gas as a method of culling is doubtful** and that the skills required to administer gas in a safe and effective manner are not readily available to enable a cull on the scale that would be necessary. It was also suggested that **gassing is not a humane method** of undertaking a cull.

### **Other Public Responses**

6.40 Of the 0.6% 'other public' responses that commented on this question, the vast majority were opposed to the use of gas as a method of culling due to its inhumane nature.

### **Q12. Would there be a need for training of licensees? If so, what form should this take?**

6.41 As this question, again, enables specific yes/no answers to be provided, responses have been quantified and are shown in Table 5 below.

Table 5: Training of Licensees

Response Category	Yes		No		Not Stated	
	Number	%	Number	%	Number	%
Key Stakeholder (total number of responses: 225)	69	30	2	1	154	69
Substantive public (total number of responses: 348)	65	19	10	3	273	78
Other public (total number of responses: 13,770)	15	0.01	1	0	13,754	99.9
TOTAL (14,343 responses)	149	1.1	13	0.09	14,181	98.9

6.42 Comments regarding the need for training of licensees and what form this training should take are summarised below.

### *Stakeholder Responses*

- 6.43 Of the responses received **almost all felt that mandatory State training was necessary** due to the health and safety issues associated with gassing and highlighted the need to ensure that any **cull was undertaken in a humane and effective manner** so as to reduce negative public perception on the use of gas.

### *Substantive Public Responses*

- 6.44 Of those responses received almost all expressed the view that it would be essential for some form of health and safety training to be provided and that it would be most appropriate for this to be provided by Defra.
- 6.45 However, some responses considered that **there was no training required** as farmers would be more than capable of administering the gas effectively.

#### **Q13. How could this training be best provided?**

- 6.46 As with other questions, few respondents sought to answer the question of alternative methods of undertaking a cull. The key issues raised are summarised below.

### *Stakeholder Responses*

- 6.47 Of the 30% 'stakeholders' that responded to this question, almost all considered that **training would have to be provided by Defra or another government agency**. One suggestion was that Defra field teams would be an effective means of providing training.

### *Substantive Public Responses*

- 6.48 Almost all responses of the 21% 'substantive public' responses that commented on this question, considered that **training should be provided by Defra**. Recommended approaches to the delivery of the training included the delivery of on-site practical training through to web-based learning with a test of competence.

#### **Q14. Would permitting the shooting of free running badgers (under licence) be practical and acceptable?**

- 6.49 As this question enabled specific yes/no answers to be provided, responses have been quantified and are shown in Table 6 below.

Table 6: Practicality and Acceptability of Shooting Free Running Badgers

Response Category	Yes		No		Not Stated	
	Number	%	Number	%	Number	%
Key Stakeholder (total number of responses: 225)	59	26	27	12	139	60
Substantive public (total number of responses: 348)	45	13	49	14	254	73
Other public (total number of responses: 13,770)	15	0.01	7	0	13,748	99.9
TOTAL (14,343 responses)	119	0.8	83	0.6	14,141	98.6

- 6.50 Views offered by respondents on whether it should be permitted to allow the shooting of free running badgers (under licence) and whether it would be practical and acceptable are summarised below.

### *Stakeholder Responses*

- 6.51 The majority of the 42% 'stakeholder' responses to this question considered that shooting should be considered a viable option in those circumstances where the preferred method of gassing was not considered practical. However, it was also noted that shooting was not ideal as it may lead to the potential for badger perturbation issues to arise and would be impractical. Particular points of note included:

- That the Protection of Badgers Act 1992 specifies requirements in relation to the type of shotgun or rifle that can be used and that this is presumably based on an assessment of the relative welfare benefits of different weapons. It was considered **necessary that evidence of research into the relative welfare benefits of different weapons would need to be provided** before comments on the suitability of shooting could be made;
- That if licences for shooting were to be issued then **guidance on best practice and training** would need to be provided;
- That due to the **level of skill** required in shooting the actual implementation of killing a free running badger would not represent a practical option; and
- That due to the nocturnal habits of badgers licensing the shooting of badgers would cause **significant health and safety issues** and would likely result in unnecessary suffering for the badgers as it is unlikely that a kill would be achieved in one shot.

### *Substantive Public Responses*

6.52 Of the 27% 'substantive public' responses received to this question, the majority did not express a view on whether or not shooting should be considered a practical method of culling. Of the views received approximately two thirds believed that shooting would not be a practical and acceptable method of culling badgers. Comments included similar views to 'stakeholders' with the following additional points:

- *"If farmers are capable of killing other vermin (such as foxes) then the badger is no different"*, and that it would be: *"probably easier than fox shooting"*. It was therefore considered that there should be **no differentiation in the treatment of the badger to other forms of 'considered' vermin**; and
- The **expert skill required to shoot a free running badger**, in the dark and to ensure a one shot kill is undertaken, would make it unlikely that such skills were available in sufficient numbers.

### **Other Public Responses**

6.53 Of the 0.3% responses received to this question, the opinion was split. Those in favour argued that shooting should be retained as an available culling method. Those opposed were concerned with the practicalities of shooting nocturnal creatures and the health and safety issues associated.

### **Q15. What features should be included in the design and use of the body snare? Are there particular features which should be avoided or included?**

6.54 As with other questions, few respondents sought to answer the question of alternative methods of undertaking a cull. The key issues raised are summarised below.

### **Stakeholder Responses**

6.55 The majority of the 42% 'stakeholders' that commented on this question expressed views opposing the use of body snares. Consequently few sought to offer a view on the features that might be included in its design and use. However a third of those answering the question also believed that snaring as an option for culling should not be ruled out and that Defra should consult with those involved in the Four Areas Trial in the Republic of Ireland where the method was successfully used. Key points are summarised below:

- That **snares were not considered an acceptable tool for badger capture** during previous culling policies and that no evidence has since been presented to change this position. If a policy of using snares was to be pursued at the very minimum they would be required to conform to standards laid out in the Humane Standards Directive;
- A number of respondents raised **questions over the effectiveness of snaring** and the need for supervision in relation to the use of snares. In particular it was noted that snares are only about 30% effective, are not species selective and require a great deal of skill to set correctly; and

- There were **animal welfare concerns** associated with the use of snares. It was argued that they would lead to unnecessary suffering not only of badgers but of other animals caught.

### **Substantive Public Responses**

- 6.56 Of the 38% 'substantive public' responses received that commented on this question 88% of these respondents expressed opposition to the use of snares as a method of culling. The key point raised concerned **animal welfare issues** with responses including the words: "barbaric", "unselective", and: "an ancient and distressing death". In particular it was suggested that "the very thought that Defra might authorise a return to snaring of any kind as a means of restraining animals awaiting slaughter is also unthinkable. It would mean returning to the barbarity, suffering and cruelty for which it was rightly banished years ago."

### **Other Public Responses**

- 6.57 Whilst only 0.2% of 'other public' responses received commented on this question, of those that expressed a view the majority were in opposition to the use of snares as a means of culling badgers due to animal welfare concerns. The counter argument was that snares had been successfully used in the trials undertaken in Ireland and guidance should be sought from them.

### **Q16. What inspection intervals for checking snares would meet welfare considerations and be practical?**

- 6.58 The views of those offering a view on the appropriate inspection intervals for checking snares so as to meet welfare considerations and be practical are set out below.

### **Stakeholder Responses**

- 6.59 Of the 39% 'stakeholder' responses received that felt snaring should be retained as an option, nearly two thirds considered that the **Defra Code of Practice on the use of snares in fox and rabbit control ought to be applied** to the snaring of badgers. The views of those against snaring noted particular concerns over the fact that snares are required to be checked by law every 24 hours and that this rarely happens and is **unenforceable**. It was considered that the only possibility of snares being used in a way which avoids suffering, injury or distress is when someone is watching the snare continuously to see whether an animal has been snared (which is considered to be impractical).

### **Substantive Public Responses**

- 6.60 The 20% of 'substantive public' responses received that made comments on this question raised similar points in relation to **animal welfare issues and the effectiveness of snaring**. Further points were also made in relation to the impracticality of enforcing inspection intervals and that the frequency of inspections required made snaring an unworkable option.

### Q17. What skills and competencies for culling are required to ensure body snares are safely and effectively deployed?

6.61 As with other questions, few respondents sought to answer the question of alternative methods of undertaking a cull. The key issues raised are summarised below.

#### *Stakeholder Responses*

6.62 It was noted that **training in the use of body snares was essential and would be a matter for Defra** and the organisations involved in the cull to determine the level of skills required. It was suggested that those individuals that had been used to undertake the RBCT would be an invaluable source of knowledge to ensure that any future resources for a cull were able to demonstrate the necessary competencies.

#### *Substantive Public Responses*

6.63 Substantive public responses to this question raised similar concerns to those identified in question 15 above.

### Q18. Is there a need for training for farmers or licensees? If so, what form should this take?

6.64 As this question was a closed question, and can be quantified, of the limited responses received the results are shown in Table 7 below.

Table 7: Training for farmers or licensees

Response Category	Yes		No		Not Stated	
	Number	%	Number	%	Number	%
Key Stakeholder (total number of responses: 225)	53	24	1	0.05	171	75.95
Substantive public (total number of responses: 348)	39	11	7	2	302	87
Other public (total number of responses: 13,770)	5	0.001	1	0	13,764	99.99
TOTAL (14,343 responses)	97	0.7	9	0.06	14,237	99.3

6.65 Views expressed in relation to the need for training for farmers or licensees noted across all categories of responses highlighted that **training would be a necessity** and should be provided by Defra.

### Q19. How could this training be best provided?

6.66 As with other questions, few respondents sought to answer the question or just reiterated what had already been stated in other questions. The vast

majority of all categories of response considered that **training would be a necessity** and should be provided by Defra. Additional comments included the need for training to be practical and on-site.

### *Disposal of Carcasses*

#### **Q20. What methods of disposal would be suitable to minimise risk of disease transmission, assist in monitoring a cull of badgers and be practical?**

6.67 As with other questions, few respondents sought to answer the question of alternative methods of undertaking a cull. The key issues raised are summarised below.

#### ***Stakeholder Responses***

6.68 From the 43% of 'stakeholders' responses which commented on this question, the following comments were made:

- That if gassing is used then **best practice would require** that the carcass is left in the sett thereby avoiding the need for disposal. For those carcasses that remain above ground it is considered that they should be subject to testing and then disposed of;
- That **incineration and burial are considered to be the other viable options** for the disposal of a carcass with Defra taking responsibility;
- The Partial RIA states that badgers will be classed as category 1 waste and that they must thereby be disposed of accordingly, involving incineration; and
- **Burial was an inappropriate method** as it may allow for concealment of inhumane practices.

#### ***Substantive Public Responses***

6.69 Of the 30% "substantive public' responses received to this question, almost half believed that **burial or incineration after the badgers had been tested would be the most appropriate method** of disposal. Other responses added that if gassing is used then best practice was to leave the badger in sett.

### *Monitoring*

#### **Q21. Do the proposals for monitoring the impact on wildlife look at the right issues? If not, what else do you think should be monitored?**

6.70 As with other questions, few respondents sought to answer the question of alternative methods of undertaking a cull. The key issues raised are summarised below

#### ***Stakeholder Responses***

6.71 From the 36% 'stakeholders' responses which commented on this question, the following comments were made:

- It was believed that there had been **little consideration given within the Consultation Document to determine the impact on wildlife** that a **widespread** cull without evidence on the impact on the biodiversity of the area, could lead to changes forever.
- There would be **positive effects from the culling of badgers** and the impact that this may have on other wildlife such as hedgehogs, bees and ground nesting birds;
- By simultaneously introducing badger culling and movement control on cattle, it will be impossible to assess the costs and benefits of controls on cattle compared with the control on badgers; and
- It was considered **that bovine TB in deer needs to be monitored** along with other animals through disease reporting procedures; and

### ***Substantive Public Responses***

6.72 The views provided from the 0.1% 'substantive public' responses which commented on this question identified that there would be a need to monitor the impact of the removal of badgers from the local eco-system, that there would be a need for testing of culled badgers to monitor prevalence of bovine TB and further points on the need to do more to improve farming bio-security measures.

# Appendix I: Key Stakeholders

## Key Stakeholders

Key stakeholders listed here are defined as national organisations. The wider group of stakeholders categorised within the consultation document were, for example, regional organisations or local businesses.

Where organisations have published their response a link to the relevant webpage is provided.

- Advocates for Animals  
<http://www.advocatesforanimals.org.uk/campaigns/political/badgersubmission.html>
- Animal Aid
- Animal Concern
- Association of Meat Inspectors GB Ltd
- Association of Show & Agricultural Organisations
- Badger Trust  
[http://www.badger.org.uk/tb/Badger Trust TB Consultation Response.pdf](http://www.badger.org.uk/tb/Badger%20Trust%20TB%20Consultation%20Response.pdf)
- British Association for Shooting and Conservation  
[http://www.basc.org.uk/media/final\\_to\\_defra.pdf](http://www.basc.org.uk/media/final_to_defra.pdf)
- British Brown Hare Preservation Society
- British Cattle Veterinary Association
- British Veterinary Association
- British Wildlife Management  
<http://www.foxhunters.net/bwm/bovinesubmission/bovine.pdf>
- Country Land and Business Association
- Countryside Alliance
- Countryside Council for Wales
- Dairy UK
- Deer Initiative, The
- Department for Culture Media and Sport – Leisure & Tourism Department
- Department of Health

- Devon Cattle Breeders Society
- English Nature  
[http://www.english-nature.org.uk/citation/citation\\_photo/05-06-110.pdf](http://www.english-nature.org.uk/citation/citation_photo/05-06-110.pdf)
- Expert Meeting on Badger Perturbation and the Possible Impact on Bovine Tuberculosis (bTB) Control Policies held by Defra's Chief Scientific Adviser on 24 January 2006  
<http://www.defra.gov.uk/science/documents/publications/OutcomeOfExpertsMeetingOnBovineTBAndPerturbation.pdf>
- Farm Crisis Network
- Farmers Union of Scotland
- Farmers Union of Wales
- Food Standards Agency
- Friends of the Earth
- Game Conservancy Trust  
[http://www.gct.org.uk/uploads/PDF19-gct\\_response\\_defra\\_badger\\_culling\\_consultation.pdf](http://www.gct.org.uk/uploads/PDF19-gct_response_defra_badger_culling_consultation.pdf)
- Independent Scientific Group on Cattle TB (ISG)  
<http://www.defra.gov.uk/animalh/tb/isg/pdf/consresponse090306.pdf>
- Institute of Ecology & Environmental Management
- Jersey Cattle Society
- Joint Nature Conservation Committee
- League Against Cruel Sports  
<http://www.league.uk.com/Consultation%20on%20badgers%20and%20bovine%20tb%20-%20League%20response.pdf>
- Livestock Auctioneers Association, The
- Longhorn Cattle Society
- Meat & Livestock Commission
- Mammal Society, The  
[http://www.abdn.ac.uk/mammal/badgers\\_tb\\_consultation.shtml](http://www.abdn.ac.uk/mammal/badgers_tb_consultation.shtml)
- National Anti Snaring Campaign
- National Association for Areas of Outstanding Natural Beauty

- National Beef Association
- National Council of Women
- National Farmers Union  
<http://www.nfu.org.uk/documents/PS06%20057%20Badger%20culling%20consultation%20FINAL%20v1.pdf>
- National Trust, The  
[http://www.nationaltrust.org.uk/main/w-chl/w-countryside\\_environment/w-food\\_farming/w-food\\_farming-agriculture\\_overview/w-food\\_farming-bovine\\_tb.htm](http://www.nationaltrust.org.uk/main/w-chl/w-countryside_environment/w-food_farming/w-food_farming-agriculture_overview/w-food_farming-bovine_tb.htm)
- Naturewatch
- Organic Milk Suppliers Co-operative (OMSCO), The
- People's Trust for Endangered Species  
<http://www.ptes.org/documents/responsetoDefrabovineTBbadgersconsultationFeb06.pdf>
- Public and Commercial Services Union
- Rare Breeds Survival Trust  
[http://www.rbst.org.uk/pdf/reports/badger\\_report.pdf](http://www.rbst.org.uk/pdf/reports/badger_report.pdf)
- Royal Agricultural Society of England
- Royal College of Veterinary Surgeons
- Royal Veterinary College
- RSPB
- RSPCA  
<http://www.rspca.org.uk/servlet/BlobServer?blobtable=RSPCABlob&blobcol=urloblob&blobkey=id&blobwhere=1142240329112&blobheader=application/pdf>
- Secret World Wildlife Rescue
- Small Farms Association
- Society for Eradication of Tuberculosis Transmission
- Specialist Cheesemakers
- South West Tourism
- Royal Association of British Dairy Farmers, The  
[http://www.rabdf.co.uk/mainnavigationpage/humane\\_badger\\_culling.htm](http://www.rabdf.co.uk/mainnavigationpage/humane_badger_culling.htm)

- Royal Society, The  
<http://www.royalsoc.ac.uk/document.asp?id=4290>
- Urban Wildlife Network
- Vegaresearch
- Veterinary Association for Wildlife Management  
<http://www.vets-for-hunting.co.uk/pdf/RespCullconsult2-06c.pdf>
- Veterinary Laboratories Agency
- Wildlife Aid
- Wildlife and Countryside Link  
[http://www.wcl.org.uk/downloads/2006/Link\\_response\\_Badger\\_Cull\\_10Mar06.pdf](http://www.wcl.org.uk/downloads/2006/Link_response_Badger_Cull_10Mar06.pdf)
- Wildlife Conservation Research Unit, University of Oxford
- Wildlife and Wetlands Trust, The
- Wildlife Trusts, The
- Woodland Trust  
<http://www.woodland-trust.org.uk/campaigns/consultationmore/badgersbovinetbresponse090306.doc>

## Appendix II: Campaign Responses

*Royal Society for the Prevention of Cruelty to Animals (RSPCA)*

**Defra consultation on controlling the spread of bovine tuberculosis in cattle in high incidence areas in England**

I am writing to register my strong objection to a badger cull. Based on the latest scientific evidence – from the Government’s own research into bovine TB – it is clear that killing badgers may actually increase bovine TB in cattle. A whole range of scientific studies show that infected cattle are the main source of infection in other cattle. The best way to tackle this would be more, routine TB testing of cattle - including before and after they are moved around the country – and strict quarantining of new animals NOT culling badgers.

It has also been claimed that culling badgers would be for the badgers’ own good, to save them from a horrible death from TB. However, most badgers don’t have TB and even those with TB often show no symptoms at all, living and breeding normally. Also, as there is no test for TB in live badgers - only dead ones - many healthy badgers would be killed to find the few that are infected! This slaughter cannot be justified.

In addition, I believe that the various methods of catching and killing badgers could cause unnecessary suffering.

The Government has already spent £34 million of taxpayers’ money performing research, which took more than five years to complete and involved killing about 12,000 badgers. This whole exercise will have been a complete waste of money (and badgers’ lives) if – having proved that badger culling is not the answer – the Government allows a cull anyway. A badger cull must not be allowed.

*Secret World Wildlife Rescue*

I am writing to register my comments to your consultation document – Controlling the Spread of Bovine Tuberculosis in Cattle in High Incidence Areas in England: Badger Culling.

The first consideration in answering this question must be a sober examination of the arguments put forward to justify a badger cull. As the DEFRA's appointed Independent Scientific Group has shown, culling badgers would not only fail to reduce Bovine TB but could in fact increase it. I am therefore fundamentally opposed to any form of badger culling.

With regard to culling methods, I believe the use of lethal gas could prove disastrous for the British Countryside. Since gas cannot distinguish between target animals in a sett, gassing animals underground will cause untold deaths and immense suffering amongst countless wild animals besides badgers. You will recall that the Government stopped the use of gas as a culling agent in 1982, following experiments which showed that it is both inhumane and unworkable. Furthermore, with 13 million recorded cattle movements each year, cattle to cattle transmission is clearly the primary cause behind Bovine TB infections. If the problem is to be tackled successfully, it is this primary source of infection that must be addressed first and as a matter of urgency.

Large scale culling of badgers is neither ethical nor manageable, and would not be cost effective or sustainable. I therefore urge you to deploy limited government funds in a manner that will maximise the environmental health benefits for the country. Instead of killing thousands of badgers, funds should instead be spent on research to identify a vaccine to protect our cattle as well as more reliable diagnostic tools.

*Coalition of Badger Groups*

I wish to register my response to your consultation document - Controlling the Spread of Bovine Tuberculosis in Cattle in High Incidence Areas in England: Badger Culling.

With regard to Question 1 - In light of the evidence presented as part of this 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?

I am **TOTALLY OPPOSED** to any form of badger culling at least until such time as all other possibilities for the minimization of bovine TB in cattle have been fully proven to be ineffective.

In view of my response to question one, the remaining 20 questions are irrelevant.

*Wildlife Trusts*

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

I am writing to strongly object to a badger cull. I firmly believe that killing badgers will not solve the cattle TB problem.

The main source of the problem is cattle to cattle infection which is considered to cause 80% of the problem.

Cattle TB testing methods are inaccurate with many cattle being killed unnecessarily, whilst leaving infected cattle not detected to pass the disease to other cattle.

Millions of cattle are moved around the country each year without a control or test. This spreads TB both locally and nationally.

The vast majority of badgers that have been killed by the Government have been found not to be infected with TB.

Many badgers are already persecuted. Even more will suffer an agonising death if the methods of killing proposed are used.

No one has confirmed what will happen to our environment if large numbers of badgers are removed.

Over £34 million of taxpayers' money has been spent on research proving that killing badgers is not the answer to resolving the cattle TB problem. It is foolhardy, and at least negligent, to ignore this and allow badgers to be culled to placate political pressure.

There is no justification to sanction the slaughter of badgers in these circumstances. A badger cull must not be allowed.

*Woodland Trust*

I am deeply concerned about the proposals in the "Consultation on controlling the spread of bovine tuberculosis in cattle in high incidence areas in England: badger culling". As well as the animal welfare implications, I do not believe the effect the proposals would have on nature conservation have been adequately considered.

Three options for culling badgers are set out in the consultation:

- I. individual licensing to help control bovine TB,
- II. general culling over large areas.
- III. targeted culling over specific areas linked herd incidence,

I do not believe a policy to cull badgers should be part of the approach to help control the disease in cattle in high incidence areas, as set out in question 1, for the following reasons:

The Independent Scientific Group on cattle TB (ISG), state that results "indicate that culling on localised scales - as envisaged in two of the three candidate policies included in the current public consultation - will almost certainly exacerbate the problem of cattle TB rather than remedying it. In principle, culling badgers could reduce TB risks to cattle, but only if performed on very large spatial scales. This would entail substantial logistical, legal and economic complications, and represents a major challenge for policymakers".

The scientific evidence does not support any localised culling as means of controlling Bovine TB.

The Randomised Badger Culling Trial was only research into localised culling, it did not look at implications of wide-scale culling. The ISG only refer to the large scale option "in principle". They also identified that such an approach would be problematic for a variety of reasons. I therefore believe large scale culling as an option is totally unacceptable as there is no scientific evidence for such an approach, nor has there been any assessment into the nature conservation implications.

Badgers are protected by law. While not endangered there has been no assessment made of the implications on the badger population of such a large scale cull across large areas. This approach would almost certainly see all badgers in south west England, and other areas, wiped out. It could in fact ultimately lead to badgers becoming scarce - no research has been done on this and no-one knows what the effects would be of removing a large woodland mammal from the ecosystem. This is not an adequate basis for pursuing a policy.

The RBCT showed an increase in foxes and hedgehogs, but a decrease in brown hare (a Biodiversity Action Plan species). The consultation states that consequences for these and other species would need to be monitored. That is simply not good enough.

Furthermore advice from the Governments own Chief Scientific Advisor's Science Advisory Council (SAC) TB sub-group does not seem to have been taken into account by Defra in drawing up the proposals. In a letter, dated 20th December 2005, to the Chief Scientific Adviser, the SAC – TB sub-group advised that a substantial proportion of infection of cattle in Britain at present is not due to infection by badgers, but is associated with other mechanisms such as cattle-to-cattle transmission. It went further to say that culling badgers is unlikely to be an effective control measure unless and until further cattle based measures have been implemented successfully.

I therefore object to all of the options for culling and urge Defra to think again. I believe it is total unacceptable to slaughter our native wildlife in an unproven bid to reduce bovine TB in cattle when evidence states clearly that it is cattle-to-cattle transmission that is the dominant factor.

In view of this, I believe the remaining 20 questions, in the consultation, are irrelevant.

*National Farmers Union***Controlling the spread of bovine TB in cattle in high incidence areas in England – badger culling consultation**

I am writing in response to Defra's consultation on badger culling. The incidence of bovine TB has increased alarmingly since the gassing of badgers was stopped in the 1980s. It is the biggest animal health problem the livestock industry currently faces. The number of cattle compulsorily slaughtered has risen from 638 in 1986 to 29,585 in 2005. The cost of bovine TB to farmers and the taxpayer has risen to £90.5m per year. This situation can not continue and I would like to remind you that it is the Government's statutory responsibility to eradicate bovine TB.

**The principle of culling badgers must be established and Defra must take the lead, and participate, in implementing a programme of controlling diseased populations of badgers as soon as possible.** Gassing is the most effective and viable method of culling, however, other methods must be kept as an alternative option for use where appropriate.

It is vitally important that farmers' identities are protected from extreme groups and I would like assurance that personal information is not made available under the Freedom of Information Act. Defra must ensure that both the public and other bodies are fully aware that it is the Government who are responsible for the eradication of bovine TB.

I fully support a programme of culling diseased badger populations to help control bovine TB in cattle within high incidence areas.

*National Beef Association (NBA)*

I am a beef farmer from \_\_\_\_\_. For the past \_\_\_\_\_ years bovine tuberculosis has restricted my ability to operate a profitable business.

In some years I have been unable to trade any cattle and compensation has been my only source of income. The detrimental effect on my business has been severe and I estimate the additional cost of living with TB to be £\_\_\_\_\_ over and above what I received in compensation. The emotional suffering endured by myself and my family of living with this terrible disease has been immeasurable.

I appreciate that this is a complex issue with strong beliefs on both sides, but at times I think the Government thinks more of badgers than it does of cattle. I am disappointed, offended and perplexed by this state of affairs. In 2005 nearly 30,000 cattle were compulsorily slaughtered, by 2010 this is predicted to reach 60,000. I believe that these live animal losses are avoidable.

I also wish to see a healthy badger population too. Vets confirm that kidneys and lungs are affected and before they die some badgers become so emaciated they weigh less than half their normal bodyweight. It is because of this that I think an effective badger cull in TB-affected areas is at least 10 years overdue.

I am relieved that DEFRA has acknowledged the need to cull badgers in infected areas as a necessary measure to tackle the problem, but I am also convinced that such a cull must be properly organised, intensive, conducted over a wide area and over an extended period of time – a minimum of 5 years.

I would also prefer a blitz-style attack with as much concentrated culling activity as possible being undertaken in all designated areas for at least the first two weeks of the approved culling period so that the culling policy has the earliest possible impact.

However, I have some concerns relating to the depth of DEFRA's commitment to an effective cull. One example is the lack of urgency in approving the use of carbon monoxide gas before a cull starts.

I am seriously of the view that without using this gas, which is available to large numbers of farmers like myself through petrol engines and catches the entire badger groups while they are underground during the day, it will be extremely difficult to conduct a satisfactory cull on the scale necessary to put TB on the retreat and then eliminate it.

Another concern is the apparent wish to commit only minimally to the conduct of the cull. It is difficult to believe DEFRA is enthusiastic about taking a lead position in helping organise, co-ordinate or part-fund a cull. Yet it is also clear that without substantial help from government, farmers will not be able to sustain the organisation or momentum necessary to cull out the large numbers of badgers required to achieve a satisfactory result.

Therefore I believe that the culling of badgers must be organised with a similar thoroughness and resolve as other difficult anti-disease tasks such as the elimination of foot-and-mouth.

I would like to see specially designated operations rooms set up in each county in which culling was to take place. These rooms should be permanently manned and staff should have telephones, computers, contact lists, maps and clear strategy targets. At least one full-time member of staff should be familiar with officials in DEFRA's TB department in Page Street.

With the cost predicted to reach £2bn over the next decade I am equally disappointed to learn that DEFRA is to release the members of the Wildlife Unit to save a mere £7m/year. Their experience and expertise would be invaluable in ensuring the success of a cull.

Sometimes I think there may be other reasons for DEFRA's apparent lack of interest in conducting a serious badger cull. It may think that by opening the way for a few farmers like myself to relieve their TB frustrations by having a pot-shot at a few badgers it will more easily persuade the farming lobby to accept the cost of cattle pre-movement testing in heavily infected areas and the newly released table valuations.

I would certainly hope this is not the case, especially as the badger perturbation such disorganised activity would create would compound the TB problem, and I look forward to being reassured that such thinking is wrong.

My understanding is that DEFRA is required by EU law to control and then eliminate bovine TB – which it has manifestly failed to do – and that it is under genuine pressure from the European Commission to introduce more urgency into its anti-TB activity now that the disease is doubling in intensity every four years and therefore posing an even greater risk to human and animal health.

I do hope my submission is given serious consideration and I am grateful for the opportunity to respond.