

## Response ID ANON-622Z-CZ5E-B

Submitted to Bovine TB: Consultation on proposals to evolve badger control policy and introduce additional cattle measures  
Submitted on 2024-04-15 10:56:12

### Introduction

1 Would you like your response to be confidential?

No

If you answered Yes to this question, please give your reason.:

2 What is your name?

Name:  
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3 What is your email address?

Email:  
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4 What is your organisation?

Organisation:

Agricultural and Horticultural Development Board (AHDB) is a statutory levy board funded by farmers and others in the supply chain. Our purpose is to be a critical enabler, to positively influence outcomes, allowing farmers and others in the supply chain to be competitive, successful and share good practice. We equip levy payers with easy-to-use products, tools and services to help them make informed decisions and improve business performance. Established in 2008 and classified as a Non-Departmental Public Body, AHDB supports the following industries: meat and livestock (Beef, Lamb and Pork) in England; Dairy in Great Britain; and Cereals and Oilseeds in the UK.

### Proposal 1: To introduce a targeted badger intervention policy

5 To what extent do you agree or disagree with the stated objective of a targeted badger intervention policy?

Strongly agree

6 Do you agree with the requirement that badger culling under the proposed targeted badger intervention policy be allowed in clusters of cattle infection with high herd incidence, after removing cattle movement related breakdowns?

Yes

7 Should there be an annual cap on the number of clusters that can be licensed to undertake badger culling?

No

8 What other factors should be taken into consideration in defining a cluster under the targeted badger intervention policy? (optional)

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There should be no minimum or maximum number of farm units that can be included in a cluster.

There should be a mechanism where local stakeholders (vets, farmers, auctioneers, land agents for example) can inform APHA of concerns they have locally. Often these individuals will have evidence of badger involvement in local TB spread, before there is evidence in the data at APHA level. This network of stakeholders will also give APHA a communication route into areas to share epidemiological data and to support in a cluster based deliverable control plan.

9 Please give reasons for your answers to this section (optional).

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Bovine TB is the most challenging infectious disease affecting the UK cattle industry. Farmers, when dealing with a TB breakdown, struggle to have the financial, physical or mental capacity to deal with anything else. Farmers who would like to proactively manage their farm business, reduce endemic disease, or invest in infrastructure for example are unable to do so.

The mental health impacts of TB are well documented, the stress and anxiety around testing alone can be debilitating. A recent Farm Community Network Survey (August 2023) stated over 90% of farms had been impacted financially by the threat of TB (over 50% significantly). And over 90% reported TB having an impact on their own and their family's mental health, over 50% stated a significant impact.

There is strong evidence as set out in the accompanying consultation document from peer reviewed papers that the reduction of badger numbers in England has significantly reduced the level of bovine TB breakdowns. Most recent statistics show the levels of TB in some areas of England are at the

lowest they have been for more than 20 years and fewer than 20,000 cattle were slaughtered for the first time in 15 years. The most recent paper published in the journal Nature in March 2024 showed a 56% reduction in new herd breakdowns, attributed to badger culling. Many industry organisations such as the British Cattle Veterinary Association (BCVA) have called for the wider more accessible use of TB tests that are more sensitive than the current TB skin test. In order for more severe cattle measures to be acceptable to farmers, there needs to be provision within TB policy to manage any reservoir of disease in the badger population through culling. TB costs taxpayers over £100 million per year. The intensive badger culls have delivered value for money, the overall net benefit being £52 million (evidenced in the 2022 VFM analysis)

The reduction of badger numbers in an area where TB is spread through cattle movements into and within an area will have no impact on reducing the level of new herd breakdowns. These areas however would benefit from target interventions and support to understand knowledge-based trading through better understanding of the moderate sensitivity of the current skin test and what impact this has on interpreting test results from potential sellers. More information and advice from the Animal and Plant Health Agency (APHA) on setting up TB units such as Approved Finishing Units (AFU) in the High Risk and Edge areas and Licensed Finishing Units (LFU) in the Low-Risk area to reduce the risk from higher risk animals being traded. Where badgers have been implicated in the spread of disease to cattle in a specific area (through APHA epidemiological investigations and whole genome sequencing), then culling badgers should be allowed.

Limiting the number of clusters that can be licensed could delay badger culling occurring where it is needed, making TB levels increase unnecessarily. At the current time there are over 52 areas that have been licensed to cull badgers. These were granted over the last 11 years, more recently limited to 10 licenses per year. This has meant areas that could have benefited from badger culling have had to wait, often many years to be granted permission to cull. This delay will have allowed TB to spread re-infecting cattle herds and causing new breakdowns increasing the cost financially and mentally on farmers. Removing more cattle than necessary from the national herd, with subsequent impacts on the sustainability of those businesses both financially and environmentally, as well as increasing the cost of TB control to taxpayers.

There is a need to act swiftly as badger numbers increase in areas post intensive culling and similarly in areas that have not yet had the opportunity to cull due to limits on the number of intensive cull licenses that were granted pre-2022. To delay culling because of caps on the number of licenses that can be issued each year would mean more farmers and farm businesses are unnecessarily impacted and this could have grave consequences on farm finances but more importantly on farmer (and veterinary) mental health.

Potential clusters should be identified based on APHA evidence but confirmed using local stakeholder knowledge.

Many local stakeholders will know the cattle movement history of an area for example auctioneers will know purchasing behaviour. Land agents will know where cattle from different holding numbers are grazed and housed at different times of the year, or land that has changed hands recently. Local farmers, game keepers and private vets should have a good understanding of the level of badger activity in the area of concern and a knowledge of the number of TB breakdowns, this information should be invaluable to APHA. Cluster TB control level interventions will only work if they have local engagement, and they need to be timely. In the Oxford Cluster Pilot local engagement took time to establish. Trust needs to be developed between government agencies and local farmers. If local networks or TB groups are already established as a knowledge exchange group for example, TB levels should be well controlled as vets and farmers have a good understanding of TB biosecurity measures including knowledge-based trading and reducing badger and cattle contact using government and industry initiatives such as the TB Advisory Service and CHECS TB. Where TB becomes an issue in specific areas these groups can be utilised by APHA and Defra to form the basis of local stakeholder groups to help manage identified clusters.

## Proposal 2: Licence and associated conditions for badger culling under a targeted badger intervention policy

10 To what extent do you agree or disagree there should be a separation of Natural England's statutory conservation advice from licensing decisions?

Strongly agree

11 Do you agree that the Secretary of State should assume the role of licensing authority for culling under a targeted badger intervention policy?

Yes

12 Please give reasons for your answers to this section (optional).

Please give reasons for your answers to this section (optional):

There is a public and industry perception of a potential conflict between Natural England's role as an adviser to the government on aspects of wildlife conservation whilst also having to execute licensing of badger culls on behalf of the government. Natural England can only issue licenses based on rules and guidance which is pre-determined. Moving the licensing authority to the Secretary of State means they can issue licenses based on science and evidence provided by the Chief Veterinary Officer (CVO), Animal Plant Health Agency (APHA) and other experts such as the bTB Partnership. The Secretary of State can then consult with Natural England and take conservation advice without any conflict of interest.

TB is a disease that affects cattle, and it is a notifiable disease due to the threat to public health. There is also the need for statutory control to enable access for international trade. Unfortunately, as one of the reservoirs of the disease is an iconic British mammal and although not rare is listed as a protected species, routine control is therefore not within the ability of the industry. The culling of badgers will always be an emotive topic and we do believe ultimate authority to grant permission to cull badgers should be sat with the Secretary of State and ultimately under government control.

13 Do you have any comments on the Information for Applicants at Annex B for carrying out the culling part of a targeted badger intervention policy? (optional)

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No other comments.

14 Do you have any other comments on the proposals for a targeted badger intervention policy? (optional)

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Concerns are raised regarding APHA resources to deliver a cluster approach to wildlife control. In the past APHA resource has not been sufficient to maintain TB control when other notifiable disease outbreaks occur. For example, Avian Influenza (AI) has led to interferon gamma testing paused with considerable impacts on farmers; increasing time under movement restrictions and the requirement for further skin testing once the interferon gamma test was finally carried out.

Also, of concern were delays in mapping radial zones in the Low-Risk areas due to staff prioritising AI outbreaks. This has led to a delay in testing in some areas and increased confusion and mistrust of government officials. Defra and APHA would need to reassure industry that APHA resources would not limit the time taken to identify clusters nor delay communication and implementation of these policies. In post cull areas especially, any time delay would undermine the benefit from the previous intensive and/ or supplementary culling as badger numbers rise over time.

The move to non-lethal control in the form of badger vaccination in new areas and in post-cull areas, has proved slow. Engaging farmers has been hard because of the lack of evidence that vaccination of badgers will reduce TB levels in cattle. Badger vaccination has also been used by an anti-culling group as a way of preventing badger culling leading to negative attitudes within the farming industry towards it.

AHDB applauds this approach of allowing culling where appropriate but including an exit strategy of badger vaccination will ensure farmers engage in a badger vaccination programme . This means when badger numbers start to increase again there is healthier protected population that doesn't pose a TB risk to the cattle. It has been shown in the farmer led Vaccination of East Sussex Badgers (VESBA) project that a large number of badgers can be vaccinated. The VESBA project allowed farmers to control when and who can access their land, this is important for engagement.

Defra is proposing to fund the badger vaccination part of the proposed target intervention policy , we believe that the cluster area once identified should be allocated a fund that the delivery group (rather than cull company) should be able to incorporate into the overall budget.

So far individual farmers have provided large amounts of money, as well as a vast amount of voluntary time to deliver a successful policy for the government. Badger culling has now been proven to significantly reduce the level of TB in cattle and long term will save the government millions of pounds just in the reduced number of reactors compensated for. There remains a reliance on farmers to fund evidence-based policy whereas badger vaccination which should have some impact on reducing the risk of TB in badger populations has no evidence it will impact the levels of TB in cattle.

Proposal 3: Support cattle purchasers by publishing bTB risk information on ibTB

15 Should animal level bTB risk information be published on ibTB?

Yes

16 Please give reasons for your answer (optional).

Please give reasons for your answer (optional):

If the government is to encourage knowledge-based trading (KBT) it must provide the information farmers and vets need to know to help make appropriate risk-based decision for their business. Therefore, any information regarding an animal or herd TB status should be available.

The caveat being that vets and farmers must be able to interpret what the information being provide means. There needs to be clear communication message via trusted partners to explain the skin test specificity and more importantly the sensitivity and how this impacts the risk from purchased cattle, to allow the information proposed to be shared on ibTB to be used effectively.

As well as providing the information to allow the TB risk from purchases/ movements to be assessed on a farm and animal level, government must also support the industry on how better to manage the risk from the trade of higher risk cattle. For example, supporting the licensing of new Licensed Finishing Units in the Low-Risk Area and Approved Finishing Units in the High Risk and Edge areas. We can manage higher risk cattle in a way as to minimise the risk to other units. Similarly providing continued funding for tools like the TB Advisory Service and CHECS and training for vets through initiatives like the BCVA Accredited TB Veterinary Adviser training so vets and farmers can work together to minimise risk from enhancing their biosecurity including knowledge-based trading.

Proposal 4: Support responsible cattle movements by publishing bTB risk information on 'supplier' herds on the ibTB mapping application

17 To what extent do you agree or disagree it would be helpful to share information on where herd owners source their stock from?

Strongly agree

18 Please give reasons for your answer (optional).

Please give reasons for your answer (optional):

The more information that can be provided to farmers and their private vets to allow better management decisions to be made on farm based on risk can only be a positive step.

Farmers along with their private vets make risk based biosecurity decision regularly and infectious disease information forms the basis of farm routine health planning.

More information available through ibTB regarding where a herd sources stock from, in the context of infectious disease control, means more transparency across the industry and will encourage cattle to be managed in more appropriate ways to reduce the risk of a TB breakdown for individual farms and also neighboring businesses.

## Additional comments

19 Do you have any other comments? (optional)

Do you have any other comments? (optional):

No other comments

## Consultee Feedback on the Online Survey

20 Overall, how satisfied are you with our online consultation tool? Please give us any comments you have on the tool, including suggestions on how we could improve it.

Very satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it. :