BOVINE TB: CONSULTATION ON PROPOSALS TO EVOLVE BADGER CONTROL POLICY AND INTRODUCE ADDITIONAL CATTLE MEASURES

Defra Consultation

Date: 22nd April 2024

The Country Land and Business Association (CLA) is the membership organisation for owners of land, property and businesses in rural England and Wales. We help safeguard the interests of landowners, and those with an economic, social and environmental interest in rural land. Our members own or manage around half the rural land in England and Wales and more than 250 different types of businesses.

Consultation background

Bovine tuberculosis (bTB) is an infectious and contagious disease which can spread within and between cattle and badgers. The disease poses a significant threat to the livestock industry and dealing with the disease costs the taxpayer over £100 million per year. Though the statistics show an improving picture, the latest data showed that over 20,000 (20,243) cattle were slaughtered because of the disease in the 12-month period ending December 2023.

The government published a bTB strategy in 2014, which set out the goal of achieving officially Bovine Tuberculosis Free status for England by 2038. This consultation is part of that strategy and seeks views on the proposed introduction of a 'targeted badger intervention' policy. Under this policy, targeted farmer-led badger culls would be permitted where there is evidence that badgers are part of the local disease problem. Badger vaccination would then be deployed as an exit strategy which preserves the gains of culling and prevents the return of the disease.

There are additional proposals for the Secretary of State to assume the licencing authority role, rather than Natural England, and proposals for additional action to support responsible cattle movements, improving transparency through the use of the ibTB interactive map.

This consultation applies to England only.

Consultation proposals

The consultation puts forward 4 separate proposals:

1. Proposal 1- To introduce a targeted badger intervention policy

2. Proposal 2- Licence and associated conditions for badger culling under a targeted badger intervention policy

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

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

General remarks

The CLA supports the UK Government's 25-year strategy to eradicate bTB by 2038.

The CLA welcomes the proposal to introduce targeted badger culling. Particularly welcome is the government's acknowledgement of the effectiveness of culling as an intervention, as supported by the scientific data. The CLA strongly agrees that the hard-fought progress which has been made against this disease cannot be put in jeopardy. Effective control of bTB and realisation of the government's ambition to eradicate bTB by 2038 requires every effective tool, including culling, to be on the table.

Consultation questions

Question (1a): Would you like your response to be confidential?

No

Question (2): What is your name?

Cameron Hughes

Question (3): What is your email address?

Cameron.hughes@cla.org.uk

Question (4): What is your organisation?

The Country Land and Business Association (CLA)

Proposal 1

Q5: To what extent do you agree or disagree with the stated objective of a targeted badger intervention policy?

a. Strongly agree

Q6: 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?

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a. Yes

Q7: Should there be an annual cap on the number of clusters that can be licensed to undertake badger culling?

b. No

Q8: What other factors should be taken into consideration in defining a cluster under the targeted badger intervention policy? (optional)

No response.

Q9. Please give reasons for your answers to this section (optional).

Ref Q7, an arbitrary cap on the number of clusters could limit the scale of any necessary cull. This would be an unhelpful limitation that is not supported by scientific evidence and could be detrimental to future control efforts.

Proposal 2

Q10. To what extent do you agree or disagree there should be a separation of Natural England's statutory conservation advice from licensing decisions?

a. Strongly agree

Q11. Do you agree that the Secretary of State should assume the role of licensing authority for culling under a targeted badger intervention policy?

a. Yes.

Q12. Please give reasons for your answers to this section (optional).

The CLA is supportive of any initiative which reduces the administrative burden on those delivering the culls. CLA member feedback has been that any steps which simplify the process and reduce box ticking are supported. The consultation contains limited information on the detail of the revised process. More detail would give CLA members the reassurance that the new process will enable the prompt processing of licence applications.

Q13. 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)

None.

Q14. Do you have any other comments on the proposals for a targeted badger intervention policy? (optional)

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Given the destructive effects of bTB outbreaks on the financial and mental wellbeing of numerous farmers, the CLA believes that all effective control measures should be retained to reduce and prevent the spread of the disease. The deployment of the whole suite of evidence-based strategies will have the greatest impact in reducing the spread of bTB. Badger culling is one such valuable tool.

The CLA welcomes the proposal to introduce targeted badger culling and the government's acknowledgement of the effectiveness of this intervention, as supported by the scientific data. The CLA is supportive of the proposal to continue farmer-led culling, which the industry has demonstrated has been effective in combating bTB. The CLA agrees that the hard-fought progress which has been made against this disease cannot be put in jeopardy. Effective control of bTB and realisation of the government's ambition to eradicate bTB by 2038 requires every effective tool to be on the table.

Though supportive of effective badger vaccination, CLA members expressed concern regarding the practicalities and cost of delivering the required programme. Any successful badger vaccination programme will have to overcome the logistical hurdles of the widespread trapping and prompt vaccination of an animal which cannot be marked to identify those which have been vaccinated. The programme would also need a highly trained and sufficiently resourced workforce to deliver it, along with adequate funding.

Proposal 3

Q15. Should animal level bTB risk information be published on ibTB?

    a. Yes.

Q16. Please give reasons for your answer (optional).

The CLA is supportive of measures which increase the transparency in the cattle market, so buyers and sellers are armed with as much information as possible to minimise the spread of bTB.

Proposal 4

Q17. To what extent do you agree or disagree it would be helpful to share information on where herd owners source their stock from?

    a. Strongly agree

Q18. Please give reasons for your answer (optional).

The CLA is supportive of the principle. However, careful thought will need to be given to how this information is presented. For example, the consultation refers to a wish to identify 'those that regularly source stock from higher bTB risk herds', though there is no definition of 'regularly.' Does this mean every year or two years, or a set number of times in an given period? The meaning will need to be clearly communicated to users of the tool. It will also be important for

this information to be kept updated, as buying habits change, and historic cattle purchases become less relevant.

Additional comments

Q19. Do you have any other comments? (optional)

Regarding proposals 3 and 4, CLA members have expressed concerns regarding the speed at which information can be uploaded onto the ibTB site. In order for cattle traders to be as informed as possible, testing information needs to be rapidly uploaded, to support accurate decision making and avoiding misleading traders. The current information on the date the information was last updated and the next update could be made more visible on existing the ibTB page.

The CLA's discussions with members have shown variable awareness of the ibTB tool amongst cattle farmers. Therefore, our view is that more effort could be made to increase the visibility of the tool. The CLA would be happy to play a role in this, including promoting the current survey on the existing and future functionality of the tool.

Adding new features to the tool and extra information will increase the complexity of the tool and could make it harder to navigate. Therefore, the CLA would be happy to put forward members to participate in user testing of enhanced versions of the service. Our experience is that videos can provide helpful demonstrations of the functionality of online tools.

The consultation determines that there will not be economic impacts for the farming industry as a result of proposals 3 and 4. Whilst the positive aspects of the proposals are significant, there could be financial implications for those buying and selling stock, as a result of the proposed additional information. For example, if ibTB indicates particular farms are high risk in terms of their trading history, this could impact the market's view of the value of their stock. This could cause ill-feeling, particularly if no cases of bTB have recently been identified in a seller's herd.

It is important to acknowledge farmer sensitivities around the identification of bTB in herds. The ibTB should be presented as a tool to help the industry eradicate bTB, rather than a means of penalising farmers by placing them on what may be seen as a publicly available blacklist.

For further information please contact:

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