Introduction
The Country Land and Business Association (CLA) represents more than 35,000 land managers and rural businesses in England and Wales who between them own and manage some 50% of the rural land. A considerable proportion of our members are involved with livestock and related business and all of them are concerned with (or about) the state of the rural economy.

Before responding to the specific question we make the following points:-

We are relieved that the government is at last willing to make the full range of measures to control badgers available in the areas most seriously affected by bovine TB. The problems resulting from the failure to control TB in recent years have been horrendous. We must work towards the disease being eradicated.

Equally, though, we are also relieved that culling is not being proposed as the only solution. Vaccination of both badgers and cattle also has a vital role to play and so we must also work to ensure that safe effective products available as a matter of urgency.

In essence we take the view that whilst bovine TB will never be eradicated by culling alone, it is also true that it will never be eradicated without it.

As with any policy that involves the destruction of wildlife, the welfare of the animals concerned must be a priority. The CLA will not support any policy that risks compromising welfare. We are therefore reassured to note that the methods of control proposed appear to be supported by the scientific community as being the most humane.

Finally we emphasise the importance of security. At the government’s various stakeholder meetings, we have been struck by the frequency with which we have been asked to refrain from recording the names of the officials involved in the exercise. Similarly we note that in recent years the ability of the relevant authorities, and indeed the courts, to protect the public from the activities of militant environmentalists and animal rights activists has been far from perfect.

In the light of this it is essential that those tasked with administering the licensing regime treat the personal details of applicants as securely as they do their own. The names and addresses of applicants must be kept absolutely confidential and not be disclosed either accidentally or intentionally.
Summary of Questions

Question 1: Comments are invited on the options, costs and assumptions made in the Impact Assessment

Whilst accepting that government has attempted to quantify matters, we note that certain ‘costs’ are for practical purposes unquantifiable, see for example “Stress and Loss, A report on the impact of bovine TB on farming families” produced by Farm Crisis Network. The failure to properly deal with the disease has had a horrendous emotional impact on a huge number farmers and their families. This is just as much a cost as the financial cost.

Question 2: Do you agree with the preferred option?

The option chosen seems to present the best way forward out of a difficult situation.

Question 3: Do you agree that this approach, of issuing licences to farmers/landowners, is the most appropriate way to operate a badger control policy?

Yes. Not merely because they are the people whose livelihoods are intimately involved but also because they are the people on the ground who know the situation locally. The CLA has discussed these issues with members for many years and we have been impressed with the depth of knowledge members have of badgers on their land, and also the lengths to which members will go, in an attempt to ensure their badgers remain healthy.

We want to stress that our objective is the eradication of bovine TB, not the eradication of badgers. The fact that achieving the objective requires an element of culling is simply a necessary evil.

Question 4: Do you agree with the proposed licensing criteria for culling and vaccination?

Bearing in mind the comments we made at the start about names being withheld we think that the criteria are workable. Whilst they are perhaps less than ideal we realise that it is necessary to carry as many reasonable members of the public with us as possible, and so the safeguards may have to be stronger than we consider necessary.

It must be kept in mind that much depends upon the implementation on the ground, and it must be remembered that bureaucratic inertia or simple determination to ‘block the cull’ could lead to plans being made too expensive or complicated to implement.

Question 5: Do you agree that the proposed methods of culling are effective and humane?

Yes. We would insist that free-shooting remains a vital part of the package. If only cage shooting were to be allowed we would almost certainly see the sort of destruction of traps that was seen during various trials in the past.
Ironically free shooting is necessary to make vaccination possible, if trapping became synonymous with culling, then vaccination would also become impossible due to the destruction of traps.

**Question 6: Do you agree with the proposed use of vaccination, particularly its focus on mitigating the perturbation effects of culling?**

Whilst we acknowledge that further research is needed, the CLA agrees that potentially vaccination has a vital role to play. We can see it being useful for those areas where there is not a hard boundary thus potentially mitigating perturbation. Within areas, we can see vaccination being preferred by some landowners who have healthy badgers. This we see as a positive thing as it means that these populations will be available to ‘restock’ other parts of the area being tackled.

**Question 7: Should anything further be done to encourage the use of vaccination?**

As mentioned above vaccination is unproven in the field and we can not rely on it at present. Yet it does have a place, and as the situation develops that place might well increase. Hence the CLA would support anything that encourages the use of vaccination in those situations in which it will be effective.

At an individual farm level we are aware that cost of vaccination could be a serious issue, especially given the low profitability of dairy farms at the moment. We would also encourage government to take steps to ensure that the development of vaccines for bovines is not hindered by the regulatory framework,

**Question 8: Do you agree with the proposed monitoring?**

We support the need for monitoring. Our concern is the way in which it is done. It is essential it is carried out in a manner that does not run the risk of individuals being targeted by militant activists. The outline suggested seems reasonable. Yet we would point out that the devil remains in the detail and the CLA would expect to be included on discussions on more detailed implementation in the future.