

# Response ID ANON-RX5M-1G7K-6

Submitted to **Bovine TB: Supplementary badger disease control**

Submitted on **2017-02-09 05:47:03**

## Introduction

### 1 What is your name?

**Name:**

Somerset Against The Badger Cull

### 2 What is your email address?

**Email:**

somersetagainstthebadgercull@gmail.com

### 3 What is your organisation?

**Organisation:**

Somerset Against The Badger Cull

### 4 What sector do you represent or have an interest in?

**Please provide a brief description.:**

Standing up for badgers, conservation and science

### 5 Would you like your response to be confidential?

No

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

## Questions

### 6 Please give us your views on the proposed approach to licensing: including the conditions of licensing, the discretion in Natural England's decision-taking and the licence period.

**Please provide further comments.:**

Conditions of licencing: The Government and its veterinary advisor, by their own admission, have produced absolutely NO credible evidence to show that badger culls carried out under the current policy have directly resulted in significant reductions in cattle TB. By contrast, all available data shows that the Welsh Government has enjoyed far greater success in reducing cattle TB in recent years without resorting to badger culling.

Thus there is no evidence on which to base the assumption that extending badger culls by issuing supplementary licenses will result in disease control benefits

Discretion in Natural England's decision-taking: The Government's proposals to issue 5-year 'supplementary licenses' amount to little more than the introduction of a general licensing system for the culling of a protected species without a specified 'end point'. By doing so it is abandoning any semblance of an 'evidence-based approach'; indeed in Paragraph 3.10 of the Consultation Document it admits that "There is no evidence on the effects of a longer-term control of badgers in areas that have completed a four-year culling period."

The present badger control policy is based on cherry-picking data from the RBCT and in this trial, the biggest benefits occurred AFTER culling had ended. The Government's own Cost Benefit Analysis (CBA) is based on this premise so moving away from it will reduce net benefits and further undermine the CBA.

The Government is effectively proposing to pass the buck for the management of a protected wildlife species to farmers, landowners and their contractors who may have vested interests that are incompatible with wildlife protection and species conservation.

Licence period - These extended culling periods render any reliance on : The Government's policy has allowed contractors to cull badgers for a period of up to six weeks within licensed zones during open seasons, and at times these periods have been extended. The cull periods are far longer than those employed during the trials on which assumptions about disease control benefits are based (typically culling was conducted over an average of 12 days during the Randomised Badger Culling Trial). Previous trial results INVALID and risk extending the disruption of badger communities over a longer period thereby increasing stress to surviving individuals and risking increased badger perturbation.

### 7 Please give us your views on the proposed plans to ensure that badger welfare is maintained, including views on the most appropriate time limit for badger control within the open season.

**Please provide further comments.:**

This question is misleading. So far badger welfare has NOT been maintained during culling. Thus continued licensing of controlled shooting is INHUMANE – both

the government's own Independent Expert Panel and the British Veterinary Association have rejected controlled shooting because of welfare concerns

There is no evidence to suggest that the accuracy of 'controlled shooting' and the associated welfare concerns have been addressed through the four years of badger culls conducted to date. Independent oversight of cull contractors to assess and evaluate welfare impacts has been markedly reduced. During the 2016 culls Natural England reported observations of less than a third of contractors, and of just 112 badgers being shot at which represents less than 2% of the total number killed by controlled shooting.

Only one of these shooting observations took place across the three pre-existing cull-zones. The remainder took place in newly licensed zones in 2016. Just one post-mortem was carried out on a shot badger. While these levels of independent observation are clearly wholly inadequate as a means of assessing potentially serious welfare concerns, nevertheless they demonstrated that 'controlled shooting' continues to fail to meet the humaneness criteria established by the Independent Expert Panel in 2013. The proposed levels of independent monitoring can give no confidence that welfare concerns can be allayed during any supplementary culls, and self-reporting by culling contractors who have a vested interest in achieving license conditions and target numbers cannot be relied upon.

The Government appears to be proceeding on the basis of its Chief Veterinary Officer's advice that "the likelihood of suffering in badgers culled by controlled shooting is comparable with the range of outcomes reported when other culling activities, currently accepted by society, have been assessed, such as deer shooting". This advice is highly subjective, and flies in the face of the conclusions reached by the Chief Veterinary Officer's veterinary peers on the Independent Expert Panel convened to assess the first year of pilot culls, and at the British Veterinary Association.

In conclusion: neither the Government nor the Chief Veterinary Officer have produced any evidence on which to base the assumption that trapping and shooting, as being conducted under license, is a humane method of killing badgers, nor do they appear to have taken any account of the long-term impact on the welfare of surviving badgers whose families and societies have been destroyed or disrupted by the culls.

**8 Please give us your views on how Natural England should evaluate the effectiveness of supplementary badger control over the five-year licence period to ensure that it meets the aim of keeping the population at the level required to ensure that effective disease control benefits are prolonged.**

**Please provide further comments.:**

This question shows no understanding of the RBCT results. It shows, in fact, a sloppy approach to the underlying science either for the purposes of political expediency or because of 'our' so-called 'post-truth' world.

In terms of keeping the badger population at the 'required level', Natural England's methods of evaluating badger populations and setting minimum and maximum cull quotas are deeply flawed and subject to huge margins of error.

The Independent Expert Panel identified 'Cull Sample Matching' as being the most accurate way of evaluating badger populations, and this was only used during the first year of pilot culls. Sett-based surveys will become increasingly unreliable within areas in which culling has taken place already over a number of years because of the disruption of badger societies and clans within those areas and the unpredictable nature of the perturbation that results.

With no knowledge of badger population and with no evidence that a reduced population will result in an 'effective disease control benefit' this question is misleading

**9 Consultee feedback on the online survey. Thank you for taking the time to participate in this online survey. It would be appreciated if you could provide us with an insight into how you view the tool and the area(s) you feel is in need of improvement, by completing our feedback questionnaire.**

Very dissatisfied

**Please provide further comments.:**

The questions are, generally, misleading. The badger control policy as it's been carried out so far represents a suppression of science and a wilful ignorance of the evidence base from the RBCT that clearly states that future badger culls should have 'no meaningful part' to play in bovine TB policy. Ignoring a world-class scientific trial in this way has set a dangerous precedent so we would have hoped the shambolic nature of the culls would have encouraged the Government to think again before pressing ahead.

However, the Government seems intent on targeting a much-loved, protected, native mammal species using erroneous information and bullying tactics. Slipped into the notes is a particularly worrying development that tenants may be able to sign up to the cull without the landlord's knowledge. This would be a particularly strange and extremely worrying departure for a Tory Government that generally puts landowner's interests high on the agenda. Is this targeted at the National Trust, perhaps?