

Response ID ANON-3ZED-79SB-U

Submitted to **Bovine tuberculosis: consultation on proposals to help eradicate the disease in England.**

Submitted on **2021-03-19 16:03:54**

Introduction

(i) What is your name?

Name:

somerset against the badger cull

(ii) What is your email address?

Email address:

somersetagainstthebadgercull@gmail.com

(iii) What is your organisation?

Please enter "none" if you are an individual who is not representing the views of an organisation.:

Somerset Against the Badger Cull

(iv) Do you want your response to be confidential?

No

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

TB Testing

1 Do you support the proposal to introduce mandatory post-movement testing of cattle moving from higher TB risk regions of Great Britain (the HRA, Edge Areas on six-monthly surveillance testing and Wales) into those parts of the Edge Area where herds are on annual surveillance testing?

Yes

Please give reasons for your answer. Where available, please provide supporting evidence. :

Cattle movements have increased dramatically in the last few decades whilst testing within the national cattle herd has fallen short. The SICCT test leaves between 20% to 50% of bTB infected animals undetected in herds. Thus the combined use of the IFN- γ (Gamma Interferon) and the SICCT test will increase sensitivity and accuracy to between 96.4-98.6%. As we have learnt in recent months from the Covid-19 pandemic, accurate testing is key to success in stopping disease spiralling out of control.

However, as we have also learnt from Covid-19, some people do not adhere to regulations. Farmers are occasionally prosecuted for not adhering to the testing and movement regime already in place but they are the tip of an iceberg. More regulation – and strict enforcement - is needed.

2 Do you agree with the assumptions and the assessment of costs and benefits in the Regulatory Triage Assessment on introducing post-movement testing to parts of the Edge Area?

I don't know/I don't have enough information

Please give reasons for your answer. :

It is impossible to answer with a simple 'yes' or 'no'. There is not sufficient information provided in the costs and benefits assessment to effectively answer this question. Maybe this could be forthcoming?

3 Do you agree that Defra should revise the current policy for using the more sensitive IFN- γ test in the HRA and Edge Area, so that in addition to persistent breakdowns, use of the test is mandatory where the below criterion is met?

Yes

Please give reasons for your answer. Where available, please provide supporting evidence.:

As stated in our response to Q1a, improvements in the accuracy of the current bTB testing regime is vital. Cattle-cattle transmission is the principal driver of bTB breakdowns and biosecurity measures on many farms is not fit for purpose. No longer are double fences maintained on boundaries between farms; slurry is moved between farms under bTB restrictions and those that are not; there is little regulation over the keeping of slurry or cattle bedding and the indoor provisions to ensure cattle are kept safe from each other over-winter are lacking. And, added to this are the numerous movements of cattle in a year or one season.

Wildlife Control

4 Do you agree with the proposal to cease the issuing of new Badger Disease Control (intensive cull) licences beyond 2022?

Yes

Please give reasons for your answer. :

SABC wants to point out that, although phrased as a simple yes/no answer, this question is deceptive. SABC does not condone the licencing of ANY further badger culls starting from NOW (March 2021). In rolling out the badger culls to 51 areas during 2020, the Government has simply pandered to the prejudice of some of its rural base. Some core donors to the Tory party who own large tracts of land do not want to be told by conservationists or scientists what species they can 'control' and which they cannot. The Protection of Badgers Act irked many of these and the so-called 'Badger Control Licences' are simply a removal of badger protection by the back door.

The international scientific community holds the RBCT in high regard and any Government professing to follow the 'science' should uphold the recommendations of the ISG which state that badger culling should play no meaningful part to play in future (or present) bTB policy. In addition, claims by this Government that there is a biodiversity crisis ring hollow when a native species is under threat of local extinctions across the country thanks to the badger culls.

The cost benefit analysis of the badger cull policy urgently needs reviewing for many reasons not least the departure in methodology from the RBCT and the value of a badger assessed at £0. SABC's work alone during the last nine years shows this assessment is derisory and bears no relation to the 'natural capital' of the species and its role within the ecology of this country's natural heritage.

5 Do you agree with the proposal that new Badger Disease Control (intensive cull) licences issued in 2021 and 2022, could, after 2 years of culling, be revoked after a progress evaluation by the CVO?

Yes

Please give reasons for your answer.:

As with Q4a, it seems disingenuous to frame this question as a simple yes/no answer. SABC would like to point out that the format of this consultation seems to indicate a wish to compile data based on simple 'yes' or 'no' answers yet, in places, there are no simple 'yes or no' answers so surely such a format defeats the objective of a public consultation?

As stated before, members of SABC don't want ANY form of intensive badger cull licences including supplementary culling issued in 2021 or 2022. Let alone 2023 onwards.

Furthermore, supplementary culling is additionally inhumane since many dependent cubs will die when/if their mother is killed. Killing badgers for eight months during a single year is simply removing the Protection of Badgers Act without a vote in Parliament and makes a mockery of it's 'protected' status. There is absolutely no guarantee that there won't be a considerable number of local extinctions throughout the country and no guarantee that (a) only licenced cull operatives are killing badgers and (b) that badgers are not being killed by either licenced or un-licenced people outside the Licence period.

Based on evidence, SABC isn't convinced that the CVO is best placed to carry out a 'progress evaluation'. At the moment, the current published PME reports carried out on culled badgers in the HRA and LRA show that the prevalence of bTB in badgers is extremely low. Yet Ministers continue to claim the opposite, as does the farming industry.

6 Do you agree with the proposal to reduce the initial financial commitment required from the companies prior to application for a badger Disease Control licence to the cost of three years of culling?

No

Please give reasons for your answer. :

Taxpayers are already paying for a large percentage of the badger cull costs. The scientific evidence shows that the current focus and expense on the badger culls is misplaced. Therefore the badger culls are not in the public interest and should not be supported by public finance. Numerous petitions and previous public consultations as well as the Link reports on the State of Nature in Britain reveal how many NGOs, charities, scientists, vets and individuals understand that culling badgers is not underpinned by sound independent scientific evidence and, furthermore, is both inhumane and immoral.

7 Do you agree with the proposal to restrict Supplementary Badger Cull (SBC) licences to a maximum of two years, prohibit the issuing of SBC licences for previously licensed areas or areas licensed for Badger Disease Control after 2020?

Yes

Please give reasons for your answer. :

Yes to the last half of the question. SABC does not support the issuing of SBC licences for previously licenced areas or areas licenced for Badger Disease Control after 2020. But, once again, this question appears to be framed as a simple 'yes' or 'no' answer though the issues raised demand a far more complex than this and why combine two questions that require different answers? To answer the first part of the question, five years of SBC culling is appalling but so is two years of SBC. To answer the first half of the question: No. from March 2021, badger culling should not form any part of future bTB strategy. Instead, focus should be given to the cattle-cattle transmission.

For those who wish to protect badgers from bTB transmitted to them by cattle or infected slurry sprayed on their setts, badger vaccination will best protect badgers until such time as cattle-cattle transmission is greatly reduced. The current Train the Trainer initiative will help to upscale badger vaccination and, at the same time encourage more farmers to deliver badger vaccination. At the moment, the farming industry and cull companies portray badger vaccination as a waste of a time but the scientific evidence shows that future generations of badgers are protected by badger vaccination programmes whereas the culling strategy shows culls increase bTB in badger populations.

Comments on the Guidance to Natural England

8 Do you have any comments on the proposed revisions to the Guidance (Annex D in the consultation PDF)?

Do you have any comments on the proposed revisions to the Guidance (Annex D in the consultation PDF)?:

NO

9 Do you have any other comments?

Do you have any other comments?:

As stated previously, this consultation is erroneously based on the assumption that industry-led badger culling is 'working' in reducing bTB incidents in the national cattle herd. Using information gleaned from the farming industry, we have discovered that veterinary assessment forms play a large part in this assumption. These forms are used to attempt to attribute a cause for cattle TB breakdowns. We have discovered over the years that when no other source of infection can easily be identified, vets are too often ready to attribute the cause to badgers. Yet they have no evidence except hearsay on which to base this assumption. It is rural mythology masquerading as fact.

Independent assessments show that in many places bTB cases are rising not falling. Biosecurity on farms is often lax or non-existent and much more focus needs to be given to cattle-cattle transmission.

Unlike badgers, the cattle industry adds to the problem of cattle change and, amongst the public, there is a big move to reduce meat and dairy consumption in this country which should be welcomed by a Government is about to host COP 26 in Glasgow later this year.

Finally, how can the public have confidence in a government that consistently parades misleading information as 'fact', has demonised a much-loved native species, has torn families and communities apart and piles insult onto injury by spending much time and money on framing a biased consultation that appears to be obsessed with leading questions?

In 2012, a small group of people formed Somerset Against the Badger Cull (SABC) in response to the news that an area within West Somerset would form one of the trial zones for a trial badger cull.

Ignoring the data from the Randomised Badger Culling Trial (RBCT) and recommendations of the Independent Scientific Group (ISG) in 2007 that future badger-culling should have no meaningful part to play in future bovine TB policy, the Coalition Government pressed ahead with a manifesto pledge made by the Conservative Party to assess if an industry-led badger cull would be safe (to the public), humane (to the badgers) and effective (in terms of killing either a minimum or maximum number of badgers).

Since 2012, the numbers within our group have increased as badger culling rolls out across the county. Driven by the cull companies and the NFU, the Government is complicit in a lack of clarity and transparency that is unparalleled in this country. No-one outside the cull companies and the Licencing Team within Natural England has any idea what percentage of Somerset is under a badger cull since a Licence can be issued to a cull company operating purely within Somerset or a cull company operating across county lines. And so we don't know how many badgers have been killed in Somerset so far. Added to this, no one has any idea whether publicly owned land eg Forestry Commission or National Nature Reserves are under culling licences. Non-participating landowners have no idea if their neighbours are culling badgers on their boundaries or not; when the cull starts or ends; or, indeed, have direct access to Operation Cobb which is the national police operation designed to ensure public safety as well as fair and impartial policing.

Despite the Government's own independent panel's assessment that free shooting badgers is inhumane and the withdrawal of the British Veterinary Association's support for badgers in May 2015, the Government and farming industry has ignored this. Independent monitoring of the humaneness of the cull has reduced exponentially during the last eight years whilst badger persecution both in terms of illegal killing and deliberate damage/destruction of setts within Somerset has increased dramatically both during and after the cull periods.

Since members of SABC do their best to minimise the damage to the badger population as a result of the demonization of the species created by this draconian policy and to ensure badgers within non-participating land are protected, we are self-appointed badger protectors and recognised as such by Operation Cobb, the national police operation for the cull.

Driven by an understanding of the science, the ethics of conserving our biodiversity and the morality of the proven inhumaneness of the cull, our members can see no foreseeable end to our role. We are deeply concerned that this particular consultation is biased in its structure and predicated on a false premise that the industry-led badger cull is working in reducing the cases of bovine TB within the national cattle herd. As independent scientists and leading conservation charities consistently state there is absolutely no scientific justification to turn the simple assumption that the badger cull is 'working' into fact since there's no evidence and that statement is purely based on prejudice and confirmation bias against badgers.

Consultee Feedback on the Online Survey

10 Overall, how satisfied are you with our online consultation tool?

Very dissatisfied

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

Get rid of simple 'yes', 'no' and 'I don't know' answers to complex questions that require more than such simplicity.

Don't combine two issues in one question with a simple 'yes', 'no', and 'I don't know' answers when the two issues require different answers