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The Rt Hon Owen Paterson MP
Secretary of State for Environment, Food and
Rural Affairs
House of Commons
London
SW1A 0AA

Bovine TB Licensing Unit
Natural England
BM 6283
London
WC1N 3XX

12th October 2012

Dear Sirs,

ANIMAL WELFARE CONCERNS RELATED TO BADGER CULLING

We the undersigned members of the veterinary profession are deeply concerned that the government's policy of licensing the culling of badgers as part of its efforts to control bovine tuberculosis in cattle will result in widespread animal suffering, and will not lead to a significant reduction in the incidence of bovine tuberculosis.

The shooting of free-roaming badgers at night with shotguns and rifles (which DEFRA refers to as 'controlled shooting'), even when carried out by trained individuals is, in our opinion, highly likely to result in suffering for a significant proportion of targeted animals. Badgers are shy, cryptic, nocturnal creatures. They are very low-slung and the 'heart and lung area of the chest' (the target area for shooters identified in DEFRA's Best Practice Guidelines published in August 2012) is well protected by the upper forelimb and associated musculature. It is, in our opinion, likely that many targeted badgers will not be killed outright; the natural behaviour of those that are injured will be to try to return to their underground setts where they will likely suffer a slow and very unpleasant death.

The two 'pilot culls' planned for Gloucestershire and Somerset are designed, according to DEFRA, to establish 'how safe, humane and effective controlled shooting is'. However, while the provisional licenses issued by Natural England for the two areas detail how badger carcasses are to be disposed of, there are no provisions explaining how the humaneness of the methodologies will be determined. Without a detailed protocol of how this is to be achieved - including the proportion of shooters that are to be directly observed, how badger carcasses are to be selected for examination, what observations/examinations will be carried out and recorded, and by whom - it is impossible to judge whether the pilot culls are likely to generate scientifically robust data which can be used to form an objective judgement on humaneness. Indeed it is our concern that the badger carcasses being assessed will likely be unrepresentative because wounded animals experiencing the greatest and most prolonged distress are highly unlikely to be retrieved for examination.

We are also very concerned that the open season stipulated in the licenses for 'controlled shooting' will inevitably result in the targeting of many pregnant sows and, if culling extends towards the end of the open season, could result in the shooting of lactating sows leading to the starvation of dependent cubs. While there are provisions within the licenses that require the release of any

lactating sows that are cage trapped, there are no provisions to spare heavily pregnant or lactating sows that are targeted by controlled shooting. In our opinion it will be extremely difficult for shooters in the dark to determine whether or not a badger is pregnant or lactating and therefore highly unlikely that these animals will be avoided.

The government's policy will not significantly reduce the burden of bovine tuberculosis. However, it will result in the decimation of local badger populations over wide areas of our countryside, and we believe it will also result in significant misery for many individual badgers. We urge the government to re-examine its policy before its actions result in widespread and unjustifiable animal suffering.

Sincerely,

Mark Jones BVSc MSc (Stir) MSc (UL) MRCVS

Marc Abraham BVM&S MRCVS CEVA Special Recognition Award for Animal Welfare 2012

Caroline Allen MA VetMB CertSAM MRCVS

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