



**HUMANE SOCIETY
INTERNATIONAL**
UNITED KINGDOM

HSI UK Response to Defra Consultation on 'Supplementary Culling'

Bovine TB: Supplementary badger disease control

<https://consult.defra.gov.uk/bovine-tb/supplementary-badger-disease-control/>

10 Feb 2017

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.

1. The Government cites the modest beneficial reduction in TB in cattle obtained during the RBCT to justify the current policy. However, the culls that are currently being licensed have deviated so far from the conditions which applied during that trial, that such extrapolation is invalid and meaningless.
2. Even after four years of culling in Gloucestershire and Somerset, there is no evidence, or indeed any suggestion of any beneficial effect on TB in cattle.
3. There is strong evidence that the Welsh Government is succeeding in reducing the level of TB in cattle using a policy that does not include the culling of badgers.
4. There is strong epidemiological and ecological evidence that the contribution of badgers to TB in cattle is very small. Conversely, evidence that the inadequacy of the current diagnostic regime in cattle resulting in infected cattle remaining in herds, evidence of prolonged incubation period of infected cattle, and evidence for the prolonged persistence of *M.bovis* in the farm environment.
5. There is no evidence whatsoever to suggest that extending the length of the culls will result in disease control benefits.
6. The Government claims to have shown that the culling policy will have a positive cost benefit. This is at odds with numerous independent economic analyses and relies on the reduction in TB in cattle shown by the RBCT, which is unlikely (bullet 1), and has not yet been demonstrated (bullet 2)
7. The Government draws conclusions from the culling of wildlife in other countries. This is misleading and inappropriate as the species involved, ecology and agricultural systems are totally different.

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.

1. The Government appointed Independent Expert Panel (IEP) reviewed the outcome of the first year of culling. They concluded that it was likely that a significant proportion of badgers shot by 'controlled shooting' were extremely likely to have suffered marked pain due to inaccurate shooting. The IEP urged that the accuracy of shooting must be improved if the policy were to be considered humane and the Government committed to ensuring this. Analysis of all culls carried out subsequently has shown almost identical levels of shooting inaccuracy and hence it is likely that the culls still do not meet the IEP's criteria for humaneness.

2. The IEP recommended that it was essential that a high level of independent monitoring and oversight was maintained in future culls. However, this level of monitoring through direct observation and examination of carcasses has been markedly reduced. The number of shooting events observed by Natural England (NE) monitors represented less than 2% of the total, with virtually no observation of shooting in the original cull areas. This level of independent monitoring is entirely inadequate to assure adequate levels of humaneness during any supplementary culls. The increased reliance on self-reporting by culling contractors is inappropriate and liable to lead to erroneous data, for example in 2016 contractors reported a level of missed shots one tenth of that observed by NE monitors.

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.

1. The ultimate aim of the badger culling policy is to reduce the level of TB in cattle and therefore, this should be the measure that should be evaluated. Therefore, the sole measure of the success of any supplementary culling should be to demonstrate a reduction in the number of newly infected cattle herds compared to paired comparison areas. There is too much uncertainty in the assumption that simply estimating the reduction in the badger population will mean that the disease in cattle will reduce, for the reasons set out above.
2. Over successive culling seasons, Natural England has used a number of different methods to estimate starting and resulting badger populations. This has resulted in widely differing population estimates each with wide confidence intervals. The IEP recommended that Cull Sample Matching as the most reliable method, but this was only used in the first year of culling.

Additional Comments

1. There is overwhelming evidence that the increase in the incidence of TB in cattle is largely due to the poor performance of the current diagnostic regime, including test insensitivity and poorly applied biosecurity measures. This is supported by the success of the Welsh Government in reducing disease incidence using strictly applied cattle measures and in the absence of badger culling.
2. The proposal to issue supplementary licences, in the complete absence of any evidence that culls conducted over four years has yet resulted in any benefit and without any evidence from the RBCT or elsewhere that culling beyond four years is warranted is completely at odds with Government commitments to evidence-based policy making.
3. HSI/UK is opposed to the mass killing of badgers as a means of controlling bovine TB. We are deeply concerned about the poor welfare of many badgers injured and killed during the cull. We are alarmed at the scaling back of the monitoring of contractors by Natural England in order to ascertain the accuracy of shooting, which it believes has not improved since culling began in 2013. Based on available evidence, and expert opinion, HSI/UK believes the cull to be both inhumane and ineffective. There is no evidence that the existing culls have reduced bovine TB, and no evidence to support any extension of culling. HSI/UK does not support the continuation of badger cull, the additional roll out of culling to new areas or any type "supplementary culling".