

Northern Ireland Badger Group



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Northern Ireland Badger Group submission to the Northern Ireland Assembly Agriculture Committee review into bovine TB

1 Introduction

The Northern Ireland Badger Group is a voluntary organisation working for the protection, conservation and welfare of badgers in Northern Ireland. We are a member group of the Badger Trust, the only charity dedicated to the conservation of badgers throughout England, Wales and all Ireland.

The Badger Trust's objectives are to promote the welfare, conservation and protection of badgers, their setts and their habitats for the public benefit. The Trust provides expert advice on all badger issues and works closely with Government, the police and other conservation and welfare organisations.

It is well known across sectors for its thorough and incisive research. As a result, the Trust's campaigns are well respected and have resulted in policy changes which have had a direct benefit for badgers and the environment. The Badger Trust campaigns on a wide range of badger protection issues, not solely those relating to bovine TB.

The Trust uses all lawful means to campaign for the improved protection of badgers. The Trust is a member of the Partnership for Action Against Wildlife Crime (PAW) and Wildlife and Countryside Link. It absolutely does not condone any non-lawful, intimidating methods of campaigning and it strongly discourages such behaviour.

The Northern Ireland Badger Group welcomes this opportunity to contribute to the Agriculture Committee review on bovine TB.

Our members recognise the economic and personal hardship that bovine TB brings to the farming industry as well as the cost to the taxpayer. Based on a robust scientific rationale, we advocate a coordinated, inclusive and cooperative approach to tackling bovine TB throughout Ireland. We are committed, and will do all we can, to make a positive contribution to Northern Ireland's bovine TB strategy.

2 Bio-security measures, testing and cattle movement

We commend the Department of Agriculture and Rural Development for the success of its evidence-based cattle management approach to reducing bovine TB in the Northern Ireland herd.

Cattle form the primary reservoir of bovine TB in Ireland and there is conclusive evidence linking cattle movement to the spread of bovine TB. (*Gilbert et al, 2005*)

Consequently we believe that existing bio-security and movement control measures should be consolidated and action taken to maximise compliance within the industry.

We understand that the current testing method (the *skin test*) fails to detect approximately 25% of infected cattle. It follows that the shortcomings of this test contribute significantly to the difficulties experienced in eradicating the disease in cattle.

In its final report to the Westminster Government of the time, the Independent Science Group¹ concluded that cattle testing, monitoring and movement controls should form the primary tools for mitigating the geographical spread of the disease.

We believe that particular attention should be given to animals coming in to Northern Ireland and that everything possible should be done to eliminate the threat of unauthorised traffic, especially across the Irish border.

There is reliable primary and anecdotal evidence that a minority of individuals ignore, flaunt or exploit existing guidelines and regulations. These cases pose a serious threat to disease control and must be taken seriously by the authorities.

Therefore adequately resourced structures for effective detection of malpractice along with enforcement of regulations should be implemented to support the wider bovine TB strategy.

It is our experience - and we are constantly surprised by it - that some long-established large animal veterinary practitioners have a very poor understanding of bovine TB beyond the testing regimen. The implications of this are very worrying, not least because stock keepers may receive misleading or factually incorrect information or advice.

We propose that the comprehensive TB policy produced by DARDNI in 2002 be reviewed and actions taken in relation to this policy since its release be audited openly and transparently. It is our assessment that many of the pertinent issues raised in this document by the department are not as frequently or publicly discussed as the proposed wildlife reservoir in badgers alone.

Note that whilst we applaud the far reaching remit of the 2002 policy document, we do not view it as exhaustive and actions should be taken to describe other aspects of the disease that must be investigated in order for a true and scientific assessment of the epidemiological question.

¹ In 1998, the Independent Scientific Group on Cattle TB (ISG), a group of independent scientists, was commissioned by the Westminster Government to conduct a Randomised Badger Culling Trial (RBCT) in order to establish the effects of badger culling on the incidence of bovine TB in herds. In 2007 the ISG final report <http://archive.defra.gov.uk/foodfarm/farmanimal/diseases/atoz/tb/isg/index.htm> was presented to the Secretary of State for DEFRA. Based on almost a decade of research costing over £50 million and 11,000 culled badgers, the report concluded that: *"The ISG's work – most of which has already been published in peer-reviewed scientific journals - has reached two key conclusions. First, while badgers are clearly a source of cattle TB, **careful evaluation of our own and others' data indicates that badger culling can make no meaningful contribution to cattle TB control in Britain. Indeed, some policies under consideration are likely to make matters worse rather than better.** Second, weaknesses in cattle testing regimes mean that cattle themselves contribute significantly to the persistence and spread of disease in all areas where TB occurs, and in some parts of Britain are likely to be the main source of infection. Scientific findings indicate that the rising incidence of disease can be reversed, and geographical spread contained, by the rigid application of cattle-based control measures alone."* [emphasis added]. These findings have not been rebutted and even putting the case at its highest, DEFRA only anticipates a net slowdown in new incidents of bovine TB of between 12-16% after 9 years, and at a net loss in cost-benefit terms according to its own Economic Impact Assessments.

3 Compensation

The Northern Ireland Badger Group holds the view that adequate compensation for cattle lost to bovine TB is an important component of any bovine TB strategy.

Therefore, we believe that individual farmers that have met the requirements of existing guidelines and regulations should not be penalised financially in the event of suffering a herd breakdown.

Neither should the honest and compliant majority of farmers be penalised by the actions of the minority who fraudulently, negligently or opportunely fail to meet industry or regulatory expectations.

We believe that herd keepers who can demonstrate high standards of animal husbandry, best farm practice and robust infection control should receive compensation equal to the value of the animal(s) concerned.

Financial incentives for compliance should be balanced with punitive measures for non-compliance or fraud.

In our view, it would be prudent to link compensation payments to the claimant's compliance with current guidelines and regulation. This should be balanced with effective enforcement measures, such as spot checks, and penalties for those individuals whose actions pose a threat to the health of the herds and livelihoods of others, and who jeopardise assurance of value-for-money on the Departmental spend of tax-payer public funds in this area.

Department resources might be effectively used to aid and incentivise farmers in terms of bio-security compliance, especially in terms of lateral spread of the disease (i.e. herd to herd transmission).

4 Vaccination

Bovine TB vaccines for cattle (and associated tests which can distinguish infected from vaccinated cattle) are being developed.

The Northern Ireland Badger Group believes that, ideally, vaccination of cattle offers the most direct and robust method of dealing with bovine TB in the herd.

Cattle vaccination can be implemented using existing structures.

We also support vaccination of badgers as a cheaper, viable alternative to culling². Vaccination offers a means of controlling bovine TB in badgers without affecting population dynamics. Disruption to social groups of badgers increases stress levels and compromises their immune system, leaving them more susceptible to infection.

² The Northern Ireland Assembly will no doubt be aware of its international legal obligations under the Bern Convention on the Conservation of European Wildlife and Natural Habitats and that it may only permit culling of badgers as part of a bovine TB strategy if there is no satisfactory alternative. The Bern Committee is currently considering a complaint against the Westminster Government on this point. Given the rapidly evolving science in this area, it is quite possible they will consider the cull breaches the Convention.

There is no doubt that vaccination (an option which the Welsh Government has chosen based on the anticipated results and more favourable cost-benefit analysis) can prevent badgers from becoming infected with bovine TB.

Field trials on the use of the badger bovine TB vaccines are currently being undertaken at a number of locations around England and Wales. Meanwhile oral bait bovine TB vaccines for badgers are being developed.

A further point is that vaccination of any species is unlikely to devalue the existing herd and wildlife data held by DARDNI.

5 Dealing with bovine TB in wildlife

The role of badgers and other wildlife in the transmission of bovine TB is poorly understood.

It is commonly considered that a small proportion of wild badgers are infected with *Mycobacterium bovis*, the causative agent of bovine tuberculosis. However, cattle to cattle transmission is a major contributory factor to the incidence of bovine TB.

Eight years of intensive badger culling (40,000 badgers culled) in the Republic of Ireland has failed to make any significant contribution to lowering levels of infection in the Republic's national herd. By contrast, cattle-based measures alone have reduced bovine TB in Northern Ireland by around 50%.

Against this background, we urge you to take on board the Independent Scientific Group's conclusion that "*badger culling cannot meaningfully contribute to the control of cattle TB.....*" Culling badgers would be nothing more than a costly, counterproductive and deeply unpopular distraction from tackling the real issue of cattle-cattle spread.

In our view, the disproportionate focus on badger culling has polarised thinking and inhibited a more progressive approach to solving the bovine TB problem.

6 Research into bovine TB

Bovine TB is a complex disease, and many aspects of it remain unclear. Much of the research to-date has been conflicting, insufficient or inconclusive. and it is important that any bovine TB strategy is evidence-based.

Currently much of the debate in the public domain in favour of badger culling appears to rest on hearsay, misinformation and a genuine lack of understanding of the core issues.

The Northern Ireland Badger Group believes that Northern Ireland has a unique opportunity to research, develop and implement an effective, progressive bovine TB strategy:

- Structures for monitoring and testing the Northern Ireland herd are well established.
- DARDNI possesses a wealth of data from herd monitoring and research studies.
- Significantly, the badger population in Northern Ireland remains stable, both in terms of numbers (2008 Northern Ireland mean population estimate = 33,500), as well minimal disruption of the badger population to-date.

We propose a cooperative approach whereby industry, veterinary and badger interests can contribute to a coherent and validated research programme.

7 Illegal badger removal and persecution

We believe that calls for a badger cull encourage a minority of individuals to engage in the illegal removal or persecution of badgers. This is known as the *green light effect*.

The number of reported badger persecution incidents in Northern Ireland increased significantly following the announcement in December 2008 of DARDNI's intention to progress a 'badger prevalence study'. This proposal included killing up to 1000 badgers and was referred to as a 'pilot cull' in some quarters. Spring 2009 saw the greatest number of badger persecution reports than any other season. (*National Wildlife Crime Unit Tactical Assessment February 2010*)

There is primary and anecdotal evidence of illegal badger killing (gassing, digging, shooting) throughout the province. We believe this is tacitly encouraged by the anti-badger hysteria generated in some quarters.

We would implore individuals with strong views on badgers to consider the possible consequences of their statements or emotive language in respect of the bovine TB question.

8 Concluding comments

We believe that TB-free status in Northern Ireland is possible but can only be achieved by adopting a fresh perspective on the problem.

The unsubstantiated perception that badgers are central - rather than peripheral - to the bovine TB problem must be replaced with a more pragmatic, evidence-based approach. Indeed, the failure to appreciate a wider and more objective view of the elements involved can only work to delay a fuller and more robust assessment of the epidemiology of this disease. Any such delay, as most would agree, will only result in: continued hardship for individual farmers; a sump of public-funds on tax-payer investment (with associated lost opportunity costs due to misdirected resourcing); animal welfare issues in terms of cattle husbandry, and encouragement of wildlife crime in terms of badger persecution.

As well as the specific issues addressed above, all possible factors that might contribute to the persistence of bovine TB in the NI herd should be investigated. These should include open, transparent and non-biased investigation of genetic composition of herds, livestock management, herd health and welfare, waste disposal etc.

The Northern Ireland Badger Group will do all it can to contribute to this challenge alongside other stakeholders

We are committed to progress and we look forward to discussing this submission with the Agriculture Committee.

On behalf of the Northern Ireland Badger Group,

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