

Response to Consultation Document issued by Defra

PLEASE HELP US PERSUADE THE GOVERNMENT NOT TO LICENSE THE KILLING OF BADGERS

How can you help?

- Read the consultation document at: <http://www.defra.gov.uk/corporate/consult/tb-control-measures/index.htm>
- Reply to its 8 questions (see **Response to Consultation document** below). This is the most important of the ways in which you can help.
- Write to your local MP at House of Commons, London SW1A 0AA and tell him/her of your views. You can find your MP at www.parliament.uk
- Write to your local newspaper and raise publicity about the futility of killing badgers as a means of combating bTB.

Response to Consultation document

- There are 8 questions.
- It is only Question 1 that requires comments.
- Questions 2 – 8 can be answered by simply replying either Yes or No but we recommend that you make a comment to at least one question.
- Obviously, you should and must express whatever views you have on the subject and are not bound to follow our position.
- Wherever a comment is entered it is extremely important to use your own words rather than repeating what is given here.
- ***However if you find responding to all 8 questions too daunting or time consuming, please simply reply to Question 1 of the Consultation stating whether or not you approve of the killing of badgers.***

Question 1 – Comments are invited on the options, costs and assumptions made in the Impact Assessment.

You may wish to answer this by saying in your own words either that:-

- you are against the unnecessary killing of all wildlife **or**
- the scientific evidence does not support the cull **or**
- killing badgers will not solve TB in cattle **or**

- it will make matters worse **or**
- the consultation document is too complex for the general public to understand **or**
- by making some of the above points or any others that occur to you, in your own words..

If you wish to expand your answer slightly, the perturbation issue could be mentioned. Culling has never previously been undertaken in the way suggested, therefore it is impossible to know whether it will replicate the results of the Randomised Badger Culling Trial (RBCT). There will be winners and losers and the negatives could outweigh the positives. Some farms in the core of the cull area may benefit whereas some outside and on the periphery will lose. Who will compensate them? The Government's preferred option 6 is not viable financially as it will cost more than it will save. The outcome cannot be measured and the cull cannot be effectively monitored. Why take such a huge risk when the use of vaccination is in sight?

If you have a depth of knowledge of the badger and its ecology, probably gained from many years' interest in the subject, you may wish to examine the document in detail. You will probably conclude that amongst other matters, the seven criteria for the licence to be issued present a major weakness. Question 1 provides an ideal opportunity to voice concerns on the criteria.

For Questions 2 – 8, you must answer either Yes or No to each question. You may make further comments in your own words. Please read the question and comments given below very carefully before answering.

Question 2 – Do you agree with the preferred option?

In the opinion of Badger Trust, the guidelines will not be followed and the preferred option is untenable.

Question 3 – Do you agree that this approach, of issuing licences to farmers/landowners, is the most appropriate way to operate a badger control policy?

It is the opinion of Badger Trust that this approach cannot be sustained or effectively monitored.

Question 4 – Do you agree with the proposed licensing criteria for culling and vaccination?

It follows from the comments already made that a cull is not supported by Badger Trust. It is impossible to fulfil the criteria and there is no feasible way in which this can be carried out in such a way as to prevent the spread of disease.

Question 5 – Do you agree that the proposed methods of culling are effective and humane?

Badger Trust cannot agree to this. It will be impossible to ensure a clean, humane kill with free shooting. Badgers will not stand still, they will run and will not present an easy target. Many may not be killed outright and will suffer needlessly before death. The safety of the general public is also a significant consideration as it will be impossible to guarantee their safety in and around the cull area.

Question 6 – Do you agree with the proposed use of vaccination, particularly its focus on mitigating the perturbation effects of culling?

Badger Trust is strongly opposed to this. The combination of vaccination and culling has not been demonstrated to be beneficial and is unlikely to mitigate the perturbation effects of culling. There is no evidence that it can negate the perturbation effect. Any culling causes perturbation, where badgers not killed will become stressed and are likely to move around, perhaps taking bTB with them.

Question 7 – Should anything further be done to encourage the use of vaccination?

It is the intention of Badger Trust to respond positively to this question. Vaccination on its own will be beneficial and has to be the sustainable option. The development of a badger vaccine to be orally delivered should remain a high priority.

Question 8 – Do you agree with the proposed monitoring?

Badger Trust considers that the proposed monitoring is clearly inadequate and cannot be expected to reveal inconsistencies or non-compliance with the licensing conditions. In most cases it is impossible to be sure how many badgers there are in

a sett. We question how the welfare issues can be monitored, e.g. how can the humane killing of badgers be ensured?

Responses which must arrive by 8th December 2010 can be sent by any of the following options:-

- By post to TBBC mailbox, c/o Nobel House, 17 Smith Square, London, SW1P 3JR (A pro-forma of the questions can be down-loaded from the Badger Trust website www.badgertrust.org.uk)
- E-mail tbbc@defra.gsi.gov.uk
- Fax 0207 238 6431

Do make it clear that you are responding to the Consultation and keep a copy of your response.