

Tuesday 1<sup>st</sup> September 2020

## **Open letter to the Prime Minister regarding badger cull licences**

Dear Prime Minister

We write to you today concerning your upcoming decision of whether or not to issue new licences for the killing of badgers in 2020.

We note that your Government responded to the Godfray review in March 2020 by stating that it would “phase out” intensive culling of badgers and instead move to badger vaccination.

However, in spite of these promises, on 15th May 2020 the Government published supplementary badger control licences for all seven cull zones which had completed four years of culling under their original licences in 2019 (areas 4-10 inclusive). Indications suggest that your Government intends to initiate a huge expansion of killing by issuing as many as 11 new licences this Autumn. For 2020 this would bring the total number of cull zones to 54, covering an area of approximately 28,000 square kilometres, with in excess of 65,000 badgers being targeted.

There are a number of factors which call the current strategy into question:

1. Badger killing is ineffective: Downs and others<sup>1</sup> used mathematical modeling to claim that, up until September 2017, the bovine tuberculosis (bTB) situation in cattle in their studied areas of the Gloucestershire pilot cull zone had improved after four years of culling – and this was much trumpeted as a success story by ministers. However, analysis of subsequent data released by APHA<sup>2</sup> demonstrated that both the prevalence and incidence of disease in cattle herds in the Gloucestershire pilot cull zone were higher following five full years of culling than before culling began<sup>3</sup>. While incidence had fallen in the Somerset pilot cull zone, prevalence among cattle herds remained static over this period, and in the Dorset pilot cull zone the prevalence increased by 20% over three years of culling. If the analysis performed by Downs and others were to be repeated to include the more recent data, very different conclusions would ensue.

2. Badgers are not heavily infected: In spite of consistent calls for killed badgers to be tested for bovine TB, very little such testing has taken place. The results of the long awaited Badger Found Dead survey, conducted in 2016 by the universities of Surrey, Nottingham and Liverpool and covering Edge area counties, remain unpublished. However, in Cumbria in 2019, 317 badgers were culled in the “minimum infected area” and an outer buffer zone, 313 of which were tested postmortem. Only

three badgers tested positive and one of these was infected with a strain unrelated to herd breakdowns, indicating that the prevalence of infection in badgers in this area is below 1%.

3. The attribution of sources of infection for cattle is not rigorous: No formal disease risk analysis (DRA) for the bTB policy has ever been conducted, contrary to best practice. The manner in which Veterinary Disease Report Forms have been used to identify Risk Pathways has been called into question<sup>4</sup>. This process has been used to attribute a high proportion of cattle herd breakdowns to badgers - vastly greater than is supported by published epidemiological evidence. Nevertheless, these unscientific and subjective reports are being used as “evidence” that badgers present a high risk to cattle in order to justify the continued killing of badgers.

4. The routine skin test in cattle is ineffective: The main reason for Defra’s failure to control bTB is the dire sensitivity of the single intradermal comparative cervical tuberculin (SICCT) test when used to identify individual infected cattle, which according to Government scientists is approximately 50%<sup>5,6</sup>. The failure of this standard skin test leaves a huge occult burden of tens of thousands of infected cattle in the high risk area (HRA) alone<sup>7</sup>. If Defra were serious about getting bTB under control, it would immediately introduce appropriate testing methodology - most urgently to enable effective pre and post-movement screening for cattle. Its failure to do so ensures that bTB continues to spread throughout the UK by the movements of infected cattle that have not been effectively screened, coupled with a lack of risk-based trading practices, inadequate on-farm biosecurity and ineffective slurry control.

The poor sensitivity of the current skin test renders the “Officially TB free (OTF)” nomenclature used for herds that have recovered from bTB extremely suspect, for undetected bTB infected cattle will be present within many herds. APHA admit that the majority of new herd incidents of bTB in the HRA occur in herds that have “recovered” from bTB in the previous three years<sup>8</sup>. Whilst these “recovered” herds may be provisionally TB free, the appellation “Officially TB free (OTF)” leaves the Government open to legal action from farmers as a result of such misclassifications by APHA. Unless the hidden reservoir of infection is brought under control, the eradication of bTB in cattle is entirely unachievable by 2038, and badger culling a mere smokescreen for policy failure.

If a testing system with a sensitivity of only 50% were to be used to diagnose Covid-19, the disease would be impossible to control and there would be public outrage.

The Government has the power to direct Natural England not to issue licences for killing badgers under Section 16 of the Natural Environment and Rural

Communities Act 2006. This situation transpired in September 2019 for Derbyshire, partly as a result of the recommendation of the Chief Veterinary Officer (CVO), partly due to the ongoing work of badger vaccination in Derbyshire, and partly over concerns of public disquiet were a cull in Derbyshire to be announced (High Court Judgement 13/05/20 Case No: CO/4817/2019). Nevertheless, as the judgement in this case made clear, this was not a scientific but a political decision, made at the behest of the Prime Minister. You are the only person who has ever intervened to revoke a licence to kill badgers.

We applaud your Government's stated aim of phasing out badger culling, but this appears to be in stark contrast to your apparent intention.

We urge you Prime Minister to honour those words and intervene to prevent the huge expansion in badger killing currently slated for September – which includes, like Derbyshire, areas with well established badger vaccination programmes. If you instruct your Secretary of State to revoke licences and explore in short order the alternative methods for disease control that we describe, public opinion and sentiment will be with you. If, however, your Government chooses to continue the discredited and ineffective badger culling policy, you will be remembered as the Prime Minister who presided over the greatest slaughter of a protected animal in living memory.

We stand ready to discuss these important issues with you and look forward to hearing back at your earliest convenience.

Kind Regards

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## References

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