

To: TB Team
Office of the Chief Veterinary Officer
Department of Rural Affairs
Welsh Assembly Government
Cathays Park
CF10 3NQ

Please be sure to submit your response by **17 December 2010**, in either of the following ways:

Email bovinetbconsultations@wales.gsi.gov.uk

Post TB Team, Office of the Chief Veterinary Officer,
Department of Rural Affairs, Assembly Government, Cathays
Park, CF10 3NQ

Response to the Consultation on Badger Control in the Intensive Action Area

I am registering my opposition to the proposals to cull badgers in the IAA. Please accept my answers to your questions as detailed below.

Q1: Do you object to the culling of any wildlife for the purposes of controlling disease in farm animals? If yes, please explain why?

Yes, unless the disease carries an immediate life-threatening risk to humans and culling is the only solution. Bovine TB does not carry such a risk in this country and alternative measures are available. The right to life should be respected for all life – human, domesticated, and wild – and we should use our resources to find therapeutic solutions to such problems. I do not understand the relevance of this question, as the Order relates only to badgers, a protected species.

Q2: In view of the fact that a licence for an injectable vaccine for badgers is now available, do you think that vaccination of badgers in bovine TB endemic areas is a viable alternative to culling to prevent disease transmission? If yes, please explain why?

Yes, vaccination is a viable alternative, reducing the prevalence of TB in badgers without the negative effects of culling. Economically it makes more sense and modelling carried out by FERA indicated that vaccination would produce a reduction in TB incidence more quickly than culling.

Q3: Do you believe that culling badgers can achieve a reduction in bovine TB incidence in cattle, to justify its use? If no, please explain why?

No. I do not believe that the science proves culling to have enough benefits to justify either the wide scale killing of a native apex predator species or the significant breaches of civil liberties necessary to force access to land for a cull. Any reduction achieved through culling is at the expense of increased TB breakdowns in boundary areas and increased TB prevalence in badgers due to perturbation – increasing the risk of TB spread.

Q4: Do you agree that the Intensive Action Area has a high incidence of bovine TB in cattle which needs to be dealt with? If no, please explain why?

Yes, the IAA has a high incidence of TB for many reasons, including high cattle numbers, predominance of dairy herds and high number of cattle movements. The disease must first and foremost be dealt with in cattle, through testing, biosecurity measures and ultimately vaccination. It has been observed that reducing TB in cattle is mirrored by reductions in the badger population. There are other measures that could yet be applied, such as introducing a system akin to the accredited herd system. Legal systems to support cattle vaccination should also be prioritized.

Q5: Do you believe that access to land for culling badgers should be enforced? If not, why not? Please give reasons for your answer.

No. This infringes a basic human right to peaceful enjoyment of a home, chosen way of life and individual beliefs. The proposal to enforce access is not acceptable in a democratic society. Lots of people enjoy the badgers; many farmers oppose culling and for some operating in tourism badgers underpin their business success. People should be given the right to opt out of any cull and elect to vaccinate badgers instead.

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Q6: On balance, do you think the benefits of culling outweigh the harm caused to the badger population in the Intensive Action Area? Please give reasons for your answer. Would you include other factors in the balance of harm and benefits? If so why?

No. The harm caused to the badger population and long-term disruption to our communities, is not outweighed by the meagre benefits in herd breakdown reduction. Badgers are a native apex predator species with a significant role in the ecology and the effects of such a large cull are highly unpredictable. We should also consider the harm caused to landowners who disagree with this cull and will be severely distressed and affected for many years by this forcible intrusion onto their homes, as well as the distress caused to other residents and visitors.

Q7: Do you agree with the prohibitions under the draft Badger (Control Area) (Wales) Order 2010? If not, why not?

No. They constitute an excessive use of power. They are an infringement of civil liberties and will be very divisive in our communities. Communities that until this worked well together are already being put under huge pressure to take sides on a matter that science does not support, and for which the finances do not add up. They encourage the wrong attitude to wildlife in general giving licence to the very brutality that the Badger Act was implemented to stop.

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please report them separately below;

The possibility of shooting of badgers in the wild (not in a cage) is included. This is not acceptable due to both the risk this would present to all countryside users and the nature of attempting to shoot an animal that would not present an easy target allowing huge opportunity for injury and also shooting of non target animals. It is also suggested that unoccupied land will be accessed without attempting to contact the owners. This is likewise not acceptable and consent should be sought from all landowners within the IAA before attempting to access land.

Whilst TB breakdowns are distressing for farmers whose herds are under restriction the few this affects are only a very small percentage of a more diverse countryside population within any one area. This raises questions about why this element is receiving such uncompromising support at the expense of others rights and lifestyles.

The balancing exercise must address the impact of a decision to cull with the excessive powers regarding access and prohibitions on other elements of the community it will affect for many years. This action will deprive people of their privacy and basic right to use their land without interference. The proposed order makes it possible for firearms to be carried and used on land where individuals and families would normally expect to be able to live free from such activities. This is a serious civil liberty issue for many. Access to all Rights of Way in the IAA will not be free of risk

There are many hidden costs not already detailed in the £9 million price tag including policing costs, and the losses to tourism.

With a cattle vaccine so close now (2012) there is no mention of the need to expedite the necessary permissions and licences to bring this into the toolbox for dealing with bTB in cattle.

The questions in this consultation are skewed so that those respondents who agree with the actions as proposed by the Minister are only required to answer yes or no, whilst those who do not agree are required to explain why. This sets a much higher threshold for respondents who do not agree and may bar those who do not have sufficient time or background information from equal participation.

NAME: _____

ADDRESS: _____

Signed:

Date:

I do not want my name, address or email published. (Tick the box if so.)

Please send confirmation of receipt of this response to email: