

Consultation Response to the TB Strategic Partnership Group

Comments by

Northern Ireland Environment Link

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Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 62 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be happy to do so.

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NIEL welcomes the opportunity to send comments to the TB Strategic Partnership Group, and from the outset we would highlight the need to base policy on sound and appropriate scientific inquiry.

Culling badgers in response to bovine TB is an approach that is not based on clear evidence, and recent research demonstrates that increasing cattle testing would be a more effective measure in controlling bTB than attempting to eradicate badgers¹. A recent report published in the Journal of Stochastic Environmental Research and Risk Assessment suggests that, based on numerical computer modelling, investment in increasing the frequency of cattle testing would be a more effective strategy than badger culling in dealing with the spread of bTB².

There appears to be little confidence within the scientific community that culling will deliver lasting benefits (and hence an inefficient use of tax payer's money³). It is an over-simplistic approach to what is a complex problem.

AFBI research suggests that contact between cattle and badgers is limited – both at grass or when housed (although DNA strain typing does indicate the presence of comparable strains of bTB in both cattle and badger populations where TB is present). Research undertaken at QUB is pending, and will shed light on the potential for spread of bTB through urine and faeces. However, the opinion of many scientists throughout the UK is that if risk and probability analyses are applied, whilst the badger may be one route of transmission of the disease it is unlikely to be the primary pathway and there is likely to be a greater risk of spread through cattle movement and nose to nose contact within and between herds and inadequate biosecurity measures on farm⁴. In fact, there is good reason to believe that cattle-to-badger transmission is higher than badger-to-cattle (because badgers forage in cow dung) so presence of bTB in badgers does not prove badger-to-cattle transmission is significant. A grounded scientific study is crucial to finding an objective way forward that is acceptable to both the public and the farming community – research must continue to build on the limited understanding that we have.

Different approaches within the UK may provide useful information to inform future control strategies in NI. However, the various approaches are not all underpinned by a scientific methodology and therefore should not necessarily be given equal weight. Care should be taken that non-objective approaches to the problem do not cause further polarisation of views.

¹ <http://www.bbc.co.uk/news/science-environment-30820579>

² <http://www.theguardian.com/uk/bovine-tuberculosis> ,
<http://www.theguardian.com/environment/2015/jan/14/testing-cattle-better-than-culling-badgers-control-bovine-tb-study-suggests>

³ <http://www.bbc.co.uk/news/uk-england-25622644>

⁴ Natural England (2011) Consultation on guidance to Natural England on the implementation and enforcement of a badger control policy – Natural England's response. See http://www.naturalengland.org.uk/Images/1112019badgercontrol_tcm6-27539.pdf; Independent Scientific Group on Cattle TB (2007) Bovine TB: The Scientific Evidence. See http://archive.defra.gov.uk/foodfarm/farmanimal/diseases/atoz/tb/isg/report/final_report.pdf

NIEL would recommend exploration and development of:

- Badger vaccination;
- Cattle vaccination (though we acknowledge this is still some years away from being workable);
- 'Biosecurity' measures – it is important that biosecurity measures, in the fullest sense, are implemented throughout the industry;
- Test Vaccinate Remove Strategies.

NIEL, and its members who have specific interest in this problem, would be pleased to discuss any of the issues raised above further.