Consultation on Potential Wildlife Intervention Options as part of the Bovine Tuberculosis in Northern Ireland: Blueprint for Eradication

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 natural and built environment of Northern Ireland. Its 63 Full Members represent 190,000 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.

A number of our member organisations are submitting detailed responses addressing the questions within the Consultation on Potential Wildlife Intervention Options as part of the Bovine Tuberculosis in Northern Ireland. This submission is intended as a high-level statement of NIEL's overall position and should be read alongside those responses. In particular, NIEL notes and broadly supports the concerns and recommendations raised by Ulster Wildlife and Northern Ireland Badger Group. Please note that our response is not made on behalf of the entirety of our members.

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Introduction

NIEL recognises that bovine tuberculosis (bTB) remains a significant challenge for Northern Ireland, imposing substantial economic, social and emotional costs on farmers, rural communities and the public purse. The agriculture sector has a legitimate interest in seeing effective action taken to reduce disease incidence and move towards eventual eradication. NIEL therefore supports the overall objective of the Blueprint and agrees that bTB must be addressed through a coordinated, evidence-led and long-term strategy.

However, we believe that any intervention must be proportionate, scientifically robust, publicly accountable and consistent with Northern Ireland's biodiversity, animal welfare and environmental obligations. Wildlife interventions should not be considered in isolation and must be assessed as one component of a wider eradication programme in which cattle-based measures remain central.

Preferred Wildlife Intervention Option

NIEL's clear preference is for **vaccination-only using baited cage trapping** as the preferred wildlife intervention option among those presented in the consultation. This position reflects our commitment to the use of the least harmful effective measures available, while recognising the need to address disease within a broader eradication framework.

We oppose non-selective culling, regardless of the method used. We are not persuaded that the consultation demonstrates a sufficiently strong case for the large-scale removal of healthy as well as infected badgers. We are concerned about the ecological, ethical, animal welfare and public confidence implications of such an approach, particularly given continuing scientific uncertainties regarding effectiveness, perturbation effects and wider ecosystem consequences.

NIEL acknowledges that some stakeholders regard Test and Vaccinate or Remove (TVR) as a possible compromise approach. Consistent with the position taken by Ulster Wildlife, we do not support TVR as the preferred option but recognise that it represents a more proportionate intervention than non-selective culling. If considered at all, it should only be within a tightly constrained, time-limited, independently monitored framework and alongside significantly strengthened cattle measures.

Cattle Measures Must Remain the Priority

A recurring theme from across our members who are responding to this consultation is the importance of ensuring that wildlife measures do not divert attention from cattle-based controls. NIEL supports stronger implementation of measures relating to

enhanced testing, movement controls, farm biosecurity, risk-based trading, disease surveillance and other cattle-focused interventions identified within the Blueprint.

Biodiversity, Welfare and Environmental Safeguards

NIEL believes that biodiversity protection, ecological integrity and animal welfare should be given substantial weight in the Department's final decision-making.

We support calls for:

- A precautionary approach where significant scientific uncertainty remains
- Stronger assessment of ecological impacts associated with wildlife interventions
- Site-specific ecological appraisal and Habitats Regulations Assessment where interventions are proposed
- Independent monitoring of animal welfare outcomes
- Transparent reporting of captures, vaccinations, removals, injuries and non-target impacts
- A clear plan for the termination of the programme with milestones and exit points included in this

We also share member concerns regarding the use of stopped restraints (snares). NIEL does not support their routine use and considers baited cage trapping to be the preferred capture method for any vaccination programme.

Governance, Delivery and Funding

NIEL does not support a model in which the Department's role is reduced solely to oversight and regulation. Wildlife intervention involving a protected native species raises significant issues of public interest, environmental protection and animal welfare. DAERA should retain a central role in programme design, governance, scientific oversight, monitoring and accountability.

Similarly, funding arrangements should be determined according to public benefit, effectiveness and accountability rather than through a presumption that wildlife interventions should be wholly privately funded. Any future programme should include adequate provision for independent scientific evaluation, ecological monitoring and welfare oversight.

Lay Vaccination

NIEL supports extending the Veterinary Surgery (Vaccination of Badgers Against Tuberculosis) Order 2010 to Northern Ireland to permit licensed lay vaccination under appropriate veterinary supervision. This would improve capacity, reduce costs and

increase the viability of vaccination-led approaches while maintaining appropriate safeguards.

Conclusion

NIEL supports the objective of reducing and ultimately eradicating bovine tuberculosis in Northern Ireland through a genuinely whole-system approach. However, we believe the evidence currently favours a strategy centred on strengthened cattle measures, improved biosecurity, future cattle vaccination preparedness, and non-lethal wildlife management.

Accordingly, among the wildlife intervention options presented, NIEL's preferred position is vaccination-only using baited cage trapping, supported by the introduction of licensed lay vaccinators and delivered within a framework of robust environmental safeguards, independent oversight and transparent monitoring.

NIEL opposes non-selective badger culling and does not support the routine use of stopped restraints. Any wildlife intervention should be proportionate, evidence-led, regularly reviewed and clearly integrated within a broader cattle-focused eradication strategy that commands public confidence and respects Northern Ireland's biodiversity and animal welfare obligations.