

Bovine TB Consultation, bTB Branch  
Animal Health and Welfare Policy Division  
Department of Agriculture, Environment and Rural Affairs  
Room 714, Dundonald House  
Upper Newtownards Road  
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30 January 2018



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Dear Sir / Madam

**Re: Ulster Wildlife response to 'Consultation on the Department's Response to the TB Strategic Partnership Group's Recommendations to Eradicate Bovine Tuberculosis (bTB) in Northern Ireland'**

Ulster Wildlife is Northern Ireland's largest local nature conservation charity. We work with local people to secure space for nature in our countryside, towns, coastlines and seas. At the time of writing Ulster Wildlife has 12,898 Members supporting our work in Northern Ireland.

Ulster Wildlife recognises that Bovine TB is a complex and costly disease and we are very conscious of the hardship that it causes the farming community and the need to find the right mechanisms to control it.

We are in broad agreement with the proposals outlined in this consultation document - our more detailed answers to the consultation questions are enclosed with this letter.

We welcome the focus on cattle testing, biosecurity improvements and encouraging improved herd health. We also believe the new governance structures will be beneficial in tackling the disease at a regional and local level if the correct balance can be found within the groups between farmers and environmentalists.

Ulster Wildlife does not support the culling of healthy badgers as proposed in the consultation's wildlife intervention strategy. However, euthanizing badgers with confirmed, advanced TB is something we could accept as humane, responsible and a means of improving health within the badger population. The 'Test Vaccinate Remove' (TVR) intervention methodology offers a more balanced approach to controlling levels of TB in badgers and cattle than the 'blanket cull' proposed in the 'core areas' model in the TBSPG report and in this consultation.

Our position is that badgers should be afforded the same approach as that adopted for cattle – ie only test-positive cattle are culled and at the very least the same should be the case for badgers especially as they are a native species protected under the Wildlife NI Order 1985 and the Bern Convention.

Our view is that badgers are only a very minor part of the bTB infection chain. Biosecurity improvements, controls on cattle movements and improvements to herd health are much more important elements of the solution and we urge the Department to focus their resources into these areas.

Badgers already face illegal persecution in Northern Ireland as evidenced by a report and study released by QUB in August 2015 which found that circa 5% of badger setts in Northern Ireland had recent signs of illegal interference or persecution. A combination of Vaccination and 'Test Vaccinate Remove' methods would seem to offer the most ethical approach in terms of a wildlife intervention strategy. Badger culling is a very emotive issue for the general public and we are certain that the majority of our Members would support our view.

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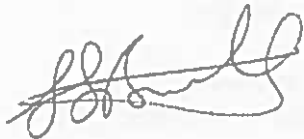
Ulster Wildlife is the operating name of Ulster Wildlife Trust, registered with the Charity Commission for Northern Ireland NIC101848. A company incorporated in Northern Ireland limited by guarantee NI12711

We understand that bTB levels are on the increase however care has to be taken in case this increase is an artifact of better or more comprehensive testing of cattle. It would be dangerous to set a policy on the basis of an artificial change in detection rates of bovine TB. With a 30% false negative in cattle, more testing will inevitably find more reactors - in the long term this will deliver a positive outcome but not if wildlife intervention policy is set on an artificial incidence increase.

Finally we support the need for further research to understand and better inform future policy. We urge the Department to prioritise and support any research into an oral bait vaccine for badgers and to keep pressure on DEFRA with regards to development of a usable Vaccination for cattle in medium to long term.

If you would like to discuss any aspects of our consultation response further please do not hesitate to contact us.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ken Brundle', written in a cursive style.

Ken Brundle  
Chair of Ulster Wildlife

## **Governance**

**G1. Do you agree with the proposal for new partnership structures to oversee the bTB Programme and to help both stakeholders and Government work together to eradicate the disease?**

Yes, Ulster Wildlife shares the view that greater involvement of stakeholders in the bTB Eradication Programme at all levels would be beneficial in achieving the result of eradication of bTB. Based on experiences to date, it is particularly important that the conservation is adequately represented as most of the other stakeholders may have a vested interest and a partner should be able to represent wildlife interests especially as the badger is a protected species locally and under the Berne Convention.

**G2. Do you agree with the three tiered approach at a national, regional and local level?**

Yes – provided that adequate representation and protocols are in place to ensure valid and balanced evidence based decisions are made and a quality assurance process is in place.

**G3. Do you agree with the membership of each tier as proposed?**

Ulster Wildlife is in broad agreement with the proposed membership of each tier however we believe there should be two scientists on the TBEP group rather than one. We propose the inclusion of one scientist from a veterinary science background and one from an ecology background with specific knowledge of badger ecology and population dynamics.

## **Tools and Processes**

**T1. Do you agree that there should be a mandatory requirement for herd-keepers to have their animals undergo gamma interferon testing where DAERA considers it necessary and that all animals which test positive to the gamma interferon test should be removed?**

Yes – any action which improves the rate/level of detection of bTB in cattle and which will reduce the risk of spread of bTB is welcomed.

**T2. Do you agree that 'chronic herds' should be recognised as a distinct entity for action and that there should be a renewed approach to dealing with chronic herds as outlined based on the likelihood that intervention will have a positive impact?**

Yes – we suggest that the Department adopts a robust approach similar to the Welsh Government in dealing chronic herds.

**T3. Do you agree that the Department should introduce measures to prevent restocking of breakdown herds through a phased approach?**

Yes – given that the primary transmission route is aerosol based and the limits on the efficacy of the cattle bTB skin test, this should help to reduce the spread of the disease. Careful consideration should given to how this would be implemented due the potential for serious hardship to a farm business and potential impact on important habitats that are currently grazed – where limiting herd numbers could lead to under-grazing.

T4. Do you agree that the Department should introduce an interim transition stage where no movements will be permitted following a bTB breakdown until at least one further full herd test has been completed (whether clear or not) and reactors have been removed?

Yes – again this should help to reduce the risk of spread, however where bTB is likely to result in prolonged closure of the herd, it is important that support is given to the farm family as this may significantly impact on their livelihood. Rural Support previously offered this service, however the charity may not exist in the future as a result of the budget consultation.

T5. Do you agree that, in the medium-term, the Department should prevent restocking of herds that do not test clear at the first retest (subject to epidemiological assessment)?

Yes – any actions that will limit the potential for cattle to cattle infection through undetected animals is welcomed. A targeted advisory programme by CAFRE to assist those affected by bTB to think through the options where medium to long term herd breakdowns occur would be worth considering. In such cases, in addition to advice from the vet, gamma interferon testing could be considered.

T6. Do you agree that, in the long-term, the Department should require a negative full herd test before allowing movement onto a farm following any disclosure episode?

Given the complex nature of bTB transmission, this would seem to be a sensible addition to the management tool kit to help reduce the spread of a disease that causes considerable hardship to the farming community. The actions of an individual farmer can have significant impact on his/her neighbours and incur considerable unnecessary cost for the tax payer. Any farmer trying to bypass the system should be penalised.

T7. Do you agree that moves should be permitted from bTB breakdown herds to approved rearing/finishing herds which are 100% housed and which meet defined, strict biosecurity conditions?

Ulster Wildlife is broadly supportive of this proposal provided the recipient farm and transporting equipment has adequate biosecurity practices in place both at the holding and during transport. The disposal of slurry from the approved unit needs to be carefully planned to minimise the risk of bTB transmission and treatment to the slurry considered to reduce the risk of spread.

T8. Do you agree that legislation should be introduced to authorise PVPs to apply DNA tags to reactors when reading the test?

Yes - any action which reduces the risk of error or fraud is welcomed.

T9. Do you agree that, in the event that the pilot scheme demonstrates that there is value in doing so, the Department should undertake reactor quality assurance checks as appropriate?

Yes - this would be worth implementing.

T10 Do you agree that the Department should expand the use of molecular techniques in order to support its strategy to eradicate bTB?

Yes – Ulster Wildlife would strongly support this research as it can provide evidence of the vectors of spread of the disease, give evidence of directional spread and indicate time-lines. Such evidence is crucial in underpinning options for / or decisions to be made in bTB intervention strategies. This research will go a long way to informing the dynamics of bTB and its spread.

## Wildlife

W1. Do you agree with the Department's proposals for wildlife intervention - that is, culling in a central zone, and complementary actions to mitigate perturbation or reinfection as appropriate?

No. Ulster Wildlife's position is that no healthy badgers should be culled as part of any wildlife intervention strategy. However, euthanizing badgers with confirmed, advanced TB is something we could accept as humane, responsible and a means of improving the health within the badger population. The 'Test Vaccinate Remove' (TVR) intervention methodology offers a more balanced approach to controlling levels of TB in badgers and cattle than the 'blanket cull' proposed in the 'core areas' model in the TBSPG and DAERA reports.

Badgers should be afforded the same approach as that adopted for cattle – i.e. only test-positive cattle are culled and the same should be the case for badgers particularly given the global importance of the species here and as a native species protected under the Wildlife NI Order 1985 and the Bern Convention.

A significant component of the global population of European badger in Northern Ireland, in fact it is estimated that over 40% of the global population of badgers (*Meles meles*) live in Sweden, the United Kingdom and Ireland (Roper 2010).<sup>1</sup> This places a significant onus on us as a society to look after a species for which we have a responsibility on a global scale. The objective is to achieve a population of healthy badgers to minimise any role in the disease transmission of bTB.

Badgers already face illegal persecution in Northern Ireland as evidenced by a report and study released by QUB in August 2015 which found that circa 5% of badger setts in Northern Ireland had recent signs of illegal interference or persecution.<sup>2</sup> A report in 2015 published by the NI Partnership for Action Against Wildlife Crime stated that the total number of reports made to the PSNI that may be potential wildlife-crime against badgers, was forty-one.<sup>3</sup> It is widely accepted that only a small proportion of the incidents are reported to PSNI.

Our view is that badgers are only a very minor part of the bTB infection chain. Biosecurity improvements, controls on cattle movements and improvements to herd health are much more important elements of the solution and we urge the Department to focus their resources into these areas. We also think consideration in the strategy should be given to the important issue slurry spreading and the spread of bTB.

We would refer the Department and TBSPG to the [TB hub](#) website - a joint industry initiative, supported by the Agriculture and Horticulture Development Board (AHDB), the Animal & Plant Health Agency (APHA), the British Cattle Veterinary Association (BCVA), the Department for Environment, Food and Rural Affairs (Defra), Landex and the National Farmers Union (NFU) and described as the 'go-to' place for British beef and dairy farmers to find practical advice on dealing with bovine TB on their farm.

We would draw attention to the section of their website: **Protect your herd from TB: a review of the science**, and in particular [Section 5. Minimise infection from cattle manure](#).<sup>4</sup> The website details scientific research into cattle slurry and the spread of bTB and highlights the need to manage the risks of spreading bTB in this way.

We would suggest therefore that proposed solutions to combat the spread of bTB in Northern Ireland would remain incomplete until the issue of manure/ slurry spreading and spread of bTB is addressed.

<sup>1</sup> Roper T. J. (2010.) Badger. Collins, London.

<sup>2</sup> <https://www.qub.ac.uk/News/Archive/2015PressReleases/August2015PressReleases/#d.en.518451>

<sup>3</sup> [https://docs.wixstatic.com/ugd/259455\\_f30e1ef8af8f4b3dba6ce534cb9afbda.pdf?index=true](https://docs.wixstatic.com/ugd/259455_f30e1ef8af8f4b3dba6ce534cb9afbda.pdf?index=true)

<sup>4</sup> [http://www.tbhub.co.uk/biosecurity/protect-herd-tb-review-science/#\(5\)-minimise-infection-from-cattle-manure](http://www.tbhub.co.uk/biosecurity/protect-herd-tb-review-science/#(5)-minimise-infection-from-cattle-manure)

Whilst we are familiar with the DNA strain typing research, a **conclusive** link between a reservoir of bTB infected badgers and **the transmission of the disease to cattle** has not yet been conclusively scientifically proven. It has been conclusively established however that there are certain pathways which are not integral to the spread of infection between badgers and cattle. A 2014 AFBI study using radio collars on cattle and badgers found that all collared cattle interacted with each other within the different herds studied and also that all collared badgers interacted with each other in their different social groups". However, at no time were badgers and cattle recorded as coming within direct close-range contact (< 2m) with each other during the study.<sup>5</sup> This leaves the main pathways to be faeces / sett / contamination at feeders and troughs – therefore to deal with any of these indirect pathways, fencing of latrines and setts and biosecure feeders and drinkers should be prioritised.

Also data regarding numbers of badgers across NI is 10 years old. We don't know whether the population is stable, or has increased or decreased over the past decade.

The justification for choosing a wildlife intervention strategy which includes the removal of all captured badgers in a core zone vs a TVR based intervention strategy is outlined on Page 17 of Annex B to the TBSPG Bovine TB Eradication Strategy.<sup>6</sup> The working example that sets out this position is simplistic in nature in that it makes several assumptions in terms of bias in capture, perturbation etc and is not reflective of the complex nature of badger ecology and disease epidemiology. The justification also makes the assumption of a 33% prevalence of bTB in the badger population which isn't supported by the data received through the RTA survey of badgers which describes a level of circa 20% maximum in 2014. It is worth noting that the efficacy of sett-side test is likely to be higher when badgers have advanced bTB, normally coinciding to when they are at a 'shedder' or even 'supershedder' stage of the disease.

This section of the TBSPG Report also states 'vaccination is considered to be ineffective in badgers already infected by bTB.' However, laboratory studies have demonstrated that vaccination with BCG can reduce the progression and severity of bTB and the excretion of *M bovis* in both badgers and cattle.<sup>7+8</sup>

The same model applied with a lower assumed bTB level in the badger population i.e. close to the maximum level outlined in the RTA Survey (20%) brings about a significantly smaller gap between the number of infected badgers remaining in the TVR model vs the full cull model. We therefore remain unconvinced by this justification as a reason for choosing a full cull against TVR throughout the core and buffer zones.

The TBSPG cites several pieces of scientific research which point to the effectiveness of culling over vaccination alone. The TVR methodology does constitute a cull, albeit of a slightly lower number of confirmed, diseased badgers and therefore should bring about the benefits highlighted by the TBSPG report. The Government in the Republic of Ireland have said of their wildlife intervention policy - that culling "has contributed" to the bTB success story, but they do not make any attempt to quantify the contribution and admit "the difficulty in attributing trends to a single factor and the cyclical nature of the disease".<sup>9</sup>

<sup>5</sup> O' Mahoney, D.T. (2014). Badger – Cattle Interactions in the Rural Environment: Implications for Bovine Tuberculosis Transmission. Report to TB & Brucellosis Policy Branch, Department of Agriculture and Rural Development, Northern Ireland.

<sup>6</sup> <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/annex-b-to-scientific-appraisal-wildlife-and-vaccination-science-and-epidemiology-proposals-by-tbspog.pdf>

<sup>7</sup> Buddle, B.M. et al (1995). Protection of cattle from Bovine Tuberculosis by vaccination with BCG by the respiratory or subcutaneous route, but not by vaccination with killed *Mycobacterium vaccae*. *Research in Veterinary Science* 59, 10 - 16 1995.

<sup>8</sup> Leisler, S. et al (2011.) Protection of Eurasian badgers (*Meles meles*) from Tuberculosis after intra-muscular vaccination with different doses of BCG. *Vaccine*, 29, 3782 – 3790.

<sup>9</sup> Department of Agriculture, Food and the Marine. (2013). Bovine Tuberculosis Eradication Programme: Department's Wildlife Policy (Badgers). <https://www.agriculture.gov.ie/media/migration/animalhealth/welfare/diseasecontrols/tuberculosisandbrucellosis/diseaseeradicationpolicy/DepartmentsBadgerPolicyJan13.doc>

We suggest that Government considers following the Welsh approach of selective TVR in bTB hot spots and/or for repeated herd breakdowns.

The TVR methodology also has the benefits of not removing healthy badgers that may be naturally resistant to bTB from the gene pool of the wider population. The best way to address the health within the badger population is not a generic cull, instead it should rely on the vaccination of healthy individuals and the removal of the sick individuals. Culling will not provide a long term benefit to the resistance of the badger population to bTB, instead to truly address the bTB reservoir and contribute to the health of the badger population BCG vaccination, and its inheritable legacy, should be prioritised. The risk of non-vaccinated cubs testing positive was reduced by almost 80 per cent when more than a third of badgers in their group had been vaccinated.<sup>10</sup>

We would emphasise the need for evidence-based policy and would recommend that any wildlife intervention should be delayed until the results of TVR Research study are known as they will be important to the ongoing bTB Eradication Strategy and determining the impact of TVR on transmission rates in cattle. To be valid this study needs to be independently peer reviewed.

A combination of Vaccination and 'Test Vaccinate Remove' would seem to offer the most ethical approach in terms of a wildlife intervention strategy. Badger culling is a very emotive issue for the general public and given the ongoing adverse public reaction in England to the DEFRA cull, this would seem to offer the most customer-centric solution particularly when most of our exports of beef and milk are to GB. It is difficult to reconcile the perception of the farmer as a 'custodian of the countryside' with an industry proposal which proposes a blanket cull of a protected species.

**W2. Do you agree with the TBSPG's and the Department's assessment that stand-alone vaccination is better utilised as part of a longer-term badger intervention strategy?**

Ulster Wildlife believes that badger vaccination is the long-term solution to the issue of bTB in wildlife coupled with TVR for repeat herd breakdowns where other disease transmission factors have been completely eliminated. We urge the Department to prioritise and support any research into an oral bait vaccine for badgers.

Modelling research suggests that the most efficient and effective way to vaccinate badgers would be to follow the spatial pattern of TB infections, for example by identifying the hotspots where the disease is concentrated. This targeted approach would save labour and costs to control the spread of the disease as opposed to culling badgers which through the perturbation effect may lead to an increase in bTB in surrounding areas.<sup>11</sup>

**W3. Do you agree that vaccination is better utilised in combination with badger removal to first reduce infection in badgers in the short-term?**

As outlined in our answer to W1 above, Ulster Wildlife's firm position is that no healthy badgers should be culled as part of any wildlife intervention strategy. However, euthanizing badgers with confirmed, advanced TB is something we could support as humane and responsible. Therefore the only short-term intervention that we would support to reduce infection in badgers is through the TVR methodology. Badgers should be afforded the same approach as that adopted for cattle – ie only test-positive cattle are culled and the same should be the case for badgers especially as a native species protected under the Wildlife NI Order 1985 and the Bern Convention.

As stated in the consultation the Department and TBSPB believe that widespread vaccination is the solution in the longer term, therefore we propose that employing TVR will

<sup>10</sup> <https://medicalxpress.com/news/2012-12-vaccination-unvaccinated-badger-cubs-tuberculosis.html> [U1]

<sup>11</sup> <https://phys.org/news/2016-09-big-extent-badgers-ib-cattle.html#Cp>

remove infected badgers and sustain populations of healthy badgers as well as endowing them with the immunological inheritance for cubs.

Ulster Wildlife also urges the Department to bring forward legislation that would allow lay persons to be trained in vaccination of badgers so that badger vaccination could be carried out outside of the target areas chosen for action. Strict training and protocols would be needed however this is current practice in both England and Wales. Landowners could then self-fund vaccination of badgers on their land under license etc.

A DAERA survey of farmers reported greater support for badger vaccination (89.6% of respondents) than culling (79.2% of respondents).<sup>12</sup>

W4. Do you agree that the role that other species might play in the spread of bTB to cattle should be kept under review and that further research should be carried out if resources allow?

Yes. Deer numbers appear to be on the increase in Northern Ireland, therefore the Department should conduct a population survey for these species and work with groups such as BASC to collect a number of deer carcasses for bTB testing on a regular basis. We caveat this point with the view that wildlife plays only a very minor part of the bTB infection chain.

W5. Do you agree that there is merit in continuing, expanding and enhancing the badger RTA Survey?

Yes – the RTA survey can provide useful data on badger ecology and epidemiology in relation to badgers found with bTB. However care must be taken using levels of bTB in RTA badgers as a measure of its prevalence in the wider badger population as it is accepted there is an inherent bias towards animals suffering from bTB being more likely to be more at risk of being killed on the road.<sup>13</sup>

## **Herd Health Management**

H1. Do you agree that Statutory Improvement Notices should be used where it is shown that good herd health management is not being applied and is creating a risk to other neighbouring herds despite advice being provided?

Yes – we would be supportive of this proposal as a last resort when a farmer is previously given advice, information and training but fails to implement them in relation to good herd health management. The actions of one farm can have a significant impact on others and therefore some form of Statutory Improvement Notice regime would be beneficial for the wider benefit of the industry. Some form of grant-aid or support could be considered to support farm businesses to improve.

H2. Do you agree that herd-keepers should be proactively encouraged to improve herd health management and take responsibility for herd health management on individual holdings?

Yes. The AFBI bTB Biosecurity Study, which was carried out in 2010-2011, indicated that less than 10% of farmers took adequate biosecurity measures to prevent spread of bTB. This suggests there is significant room for improvement in terms of biosecurity and herd health management in Northern Ireland. Almost 50% of farmers in the study admitted that they did not take basic biosecurity measures. If rectified, this would be very likely to reduce the overall risk of herds going down with bTB as well as protecting against the risk of other diseases.

<sup>12</sup> Bovine Tuberculosis Biosecurity Study County Down, Northern Ireland 2010-2011, O'Hagan et al.

<sup>13</sup> <http://dx.doi.org/10.1098/rspb.2013.1634>



We appreciate that the Department had made efforts to inform and encourage the farming community to take biosecurity seriously as a method for controlling bTB levels but clearly these efforts have not yet delivered the desired result.

We agree that the new governance structure proposed in this consultation will help to target messaging where it is needed most and will help to foster innovative solutions for bringing the message of the importance biosecurity to farmers in Northern Ireland.

Farm Business Improvement Grants could continue to provide support for focus on biosecurity measures such as double fencing of farm boundaries, for fencing off badger setts, for provision of badger proof drinkers and troughs and badger proof farmyard gates.

**H3. Do you agree that the farming industry should lead in the adoption of an 'informed purchasing' approach for farmers bringing in stock to their farms?**

We believe this is something the industry and the Department should form a view on.

**H4. Do you agree that segregation notices should be introduced to protect those herds that are at risk of disease spread from high-risk groups within bTB breakdown herds?**

Yes – however the practicalities of this need to be considered to avoid issues of any overstocking or animal welfare effects.

**H5. Do you agree with the Department's assessment that, given the high levels of bTB within Northern Ireland, it is not currently feasible to introduce herd classification and purchasing based on herd bTB history?**

We agree but feel that consideration should be given to bringing in herd classification and purchasing based on herd bTB history in the medium term or as quickly as is possible as it will further incentivise good herd health management.

**H6. Do you agree with the Department's assessment that industry, with support, should proactively encourage farmers to select bTB resistance in the selection of breeding material?**

Yes. This is an effective tool that would make a significant difference however needs good evidence to underpin the resistant strains.

**H7. Do you agree that industry should have a lead role to play ensuring that the legislative requirement, to clean and disinfect vehicles each time they are used to transport animals, is met?**

Yes. We believe any legislative requirement should be fully met and that steps need to be taken by the industry and the Department to ensure this is the case. Careful disposal of disinfectant and associated grey water must be ensured to minimise impact on the wider environment.

We would also endorse the use of random inspections, for example at livestock marts, to encourage compliance. Training could be provided for transport operators and contractors to improve biosecurity and help minimise disease transmission.

## Finance and Funding

F1. Do you agree to the principle that there should be a reduction in the compensation rate from the current level of 100% of an animal's market value?

Ulster Wildlife believes that a system of compensation which recognises compliance would be the fairest option and this could encourage behavioural and culture change. Given the financial challenges faced by the agricultural industry, the potential impact of Brexit and the investment needed to upgrade on farm biosecurity, this requires careful consideration.

An approach similar to that used by PSNI to address road safety would be worth considering. If a breakdown occurs, the farm owner/manager should be given advice and support to resolve the issue. Where advice has not been followed he should be asked to attend a bTB training course rather than incur a penalty – at least for the first occasion. Given the complex nature of the disease, following a breakdown, the farmer could be offered membership of a specialist discussion group linked to their local REP group, with a structured L&D programme and mentoring support. Compensation penalties would then apply to repeat incidents where advice has not been followed.

F2. Do you agree that the compensation rate paid should be set at 90% of market value in year one, reducing to 75% of market value in year two, subject to the compensation cap also being applied?

We don't have a view on the actual levels of proposed percentage rates suggested. This is a matter for the industry and DAERA.

F3. Do you agree to the principle that there should be a cap on the level of compensation paid per animal?

This is a matter for the industry and DAERA.

F4. Do you agree that, if a compensation cap is introduced, it should be set at £1,500 for a non-pedigree animal, £1,800 for a pedigree animal, and £3,500 for the removal of one pedigree stock bull per herd-keeper each year?

This is an issue for DAERA and the industry.

F5. Do you agree with the Department's approach to keep the introduction of a specific levy for the bTB programme under review but not to introduce one at this time?

This is a matter for the industry and DAERA, however the introduction of a levy at this stage might be useful in terms of providing financial provision for compensation and if possible the support services necessary to help the industry move forward. If a wildlife intervention is deemed to be necessary, we would prefer that the cost of this is covered by government to ensure ethical service provision as the badger is a protected animal.

F6. Do you agree that each herd-keeper should pay for one herd test per year?

This is a matter for the industry and DAERA.

## Research

R1. Do you agree that the TBEP should be recognised as a significant stakeholder in the research agenda and should be able to input into the identification of gaps and the research commissioning process?

Yes – please refer to our answer to G3 in terms of membership of TBEP. TBEP should also be tasked with scanning emerging research and ensuring best practice recommendations are embedded through the stakeholder network. There is little point in replicating research that exists or is already underway in other parts of the UK – however there may be gaps or issues specific to NI that need to be addressed through research and development.

R2. Do you agree that a representative(s) from the TBEP should sit on the steering group which will oversee the proposed new programme of bTB research?

Yes research and development will be important in addressing the issue of bTB and we propose that the two scientist representatives on TBEP (one veterinary scientist and one ecologist as proposed in our answer to G3) would be most appropriate to sit on the steering group which oversees this programme.

We would be particularly keen to see further studies into use of phage and qPCR tests.<sup>14</sup>

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<sup>14</sup> <https://www.theguardian.com/uk-news/2017/oct/14/badger-culls-could-end-tuberculosis-trials-new-test>

