Ulster Wildlife consultation response guidance –

Consultation on the Department’s Proposed Implementation and Next Steps of the bTB Eradication Strategy for Northern Ireland.

Please see below a summary of the Ulster Wildlife position on the consultation questions.

This is a public consultation, open to all citizens in Northern Ireland to have their say on controlling Bovine TB.

You can use this document to help you complete your own consultation response to the Department for Agriculture, Environment & Rural Affairs.

The consultation closes on 10 September 2021, 5pm and can be accessed via this link:

<https://www.daera-ni.gov.uk/consultations/consultation-departments-proposed-implementation-and-next-steps-btb-eradication-strategy-northern>

Ulster Wildlife Overview

We fully acknowledge the complex and costly nature of the disease and the impact that bTB has on farming families and as such this consultation has been taken very seriously by the charity and carefully considered. We would like to see a solution to bTB and feel that progress is now urgent, however non-selective badger culling is not considered to be a proportionate or acceptable way to address this issue, especially when more ethical alternatives exist.

Infection of bTB is most commonly spread by cattle to cattle contact although the bacteria is shed in mucus, saliva, milk, faeces/slurry and indirect infection is also possible via shared equipment or contractors. It is acknowledged that badgers can play a role as a secondary host in the spread of TB on or between farms however, in most cases this risk is low compared to cattle-to-cattle transmission.

Question one – Do you agree with the criteria for selecting herds to receive interferon

gamma testing?

Ulster Wildlife position – Yes

* Use of the interferon gamma test (IFN-y) will maximise the probability of detecting bTB-infected animals in cattle herds affected by breakdowns and should be compulsory within the categories outlined given the significant investment made in time, resource and compensation by government through public funds.
* The criteria set out in the Consultation Document details scenarios where supplementary testing can be most effectively applied to clear infection from those herds which pose the greatest risk of harbouring undetected disease. In addition the scope and rationale of the criteria provides a proportionate and targeted use of IFN-y to greatly assist in the Eradication Programme.
* As the testing will result in an increased number of animals testing positive and removed from the herd, it is important that farmers are supported through this transition process to avoid a loss in income.

Question two – Do you agree with the proposal to introduce testing of non-bovines as

deemed necessary by DAERA?

Ulster Wildlife position – Yes

Bovine TB can be carried by a variety of species including badgers, deer, alpacas, llamas, goats, foxes, cats and dogs. We therefore agree with the introduction of testing non-bovines as deemed necessary by the Department. However, we are strongly of the view that only infected animals should be removed. There is no justification for killing healthy animals.

Question three – Do you agree with DAERA’s preferred option for wildlife intervention?

Ulster Wildlife position – No

* Ulster Wildlife disagrees with the preferred approach for wildlife intervention in the consultation as it is disproportionate in relation to the wildlife contribution to Bovine TB transmission.
* Badgers are a protected species and there are ethical alternatives, which have been shown to be effective in reducing the level of Bovine TB in badgers, instead of non-selective culling by shooting free roaming badgers.
* Over 100,000 badgers have been killed in England and also in the Republic of Ireland in recent years during badger culls with variable impact on bovine TB levels in cattle. Scientific reviews by experts have shown that any contribution by badgers in transmitting the disease is modest ([Review of government’s bovine TB strategy published - GOV.UK (www.gov.uk)](https://www.gov.uk/government/news/review-of-governments-bovine-tb-strategy-published)
* DAERA’s own research indicates that 4 out of 5 badgers in Northern Ireland are bovine TB-free. There is therefore no justification for a non-selective cull of badgers.
* Test vaccinate release or remove (TVR) has been piloted in NI and proven to reduce the level of bTB in badgers from 14% to 2% over a 5-year period.

Question four - Do you agree with DAERA’s preferred funding model for wildlife

intervention?

Ulster Wildlife position – No

* As we do not support the preferred wildlife intervention approach, we do not support the preferred funding model for this approach.
* We feel that TVR options should be further explored to provide a more acceptable way to reduce disease levels in the badger population.
* Methods to reduce the cost of TVR should be further explored to improve the cost effectiveness of this option and actively engage farmers and landowners in this process as custodians of our countryside.

Question five - Do you agree with DAERA’s proposal for the introduction of a £5000 cap on

compensation?

Ulster Wildlife position – We feel this a matter for the Department and the industry. The cap will only affect pedigree breeding herds and potentially bulls.

Question six – Do you agree with DAERA’s proposals for a reduction in compensation?

Ulster Wildlife position – No

* Our view is that given the scientific uncertainties that still surround bTB transmission, its control, the testing regime and the significant impact it can have on farming families, compensation cuts should **only** apply where farmers have not followed best practice biosecurity standards agreed between the DAERA and the industry or adopted where they have adopted risky behavior.
* As the increased use of interferon-gamma testing will increase the number of animals identified as infected and these will subsequently be removed, it is important that farmers are supported through this transition. The new testing regime should help to provide long-term sustainable benefits.
* There should be a specialist TB advisory service to help farmers understand what they can control on farm to reduce the risk of disease or the impact of an outbreak.