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The Department of Agriculture, Environment & Rural Affairs (DAERA) recently consulted on proposals to eradicate bovine TB which includes plans for a cull of healthy badgers in Northern Ireland. Whilst we were in broad agreement with the proposals outlined, we do NOT support the culling of healthy badgers as part of a wildlife intervention strategy.

We recognise that bTB is a complex and costly disease and causes economic hardship to the farming community and the need to find the right mechanisms to control it. However, we do NOT believe that a 'blanket' badger cull in bTB hotspots is the answer.

DAERA's proposals for a wildlife intervention strategy

The Department's proposals for wildlife intervention include 'blanket' culling of ALL badgers in a central zone of a size of approx 100km² each in a number of bTB hot spots, and 'Test-Vaccinate-Remove' (TVR) intervention (i.e. euthanizing badgers that test-positive with advanced TB and vaccinating test-negative badgers) in a buffer zone to mitigate perturbation.

The consultation closed on 5 February 2018 and can be found here: <https://www.daera-ni.gov.uk/consultations/bovine-tuberculosis-eradication...>

Our view

1. Healthy badgers should NOT be culled as part of any wildlife intervention strategy.

Ulster Wildlife believes that no healthy badgers should be culled as part of any wildlife intervention strategy. Badgers are a protected species under the Wildlife NI Order 1985 and the Bern Convention and should be afforded the same treatment as that adopted for cattle – i.e. all cattle are tested first and only test-positive cattle are culled.

2. A combination of 'Test Vaccinate Remove' intervention and badger vaccination are the most ethical approach in terms of a wildlife intervention strategy.

We believe the 'Test Vaccinate Remove' (TVR) intervention methodology (i.e. euthanizing badgers that test-positive with advanced TB and vaccinating test-negative/healthy badgers) throughout both the core and buffer zones offers a more balanced approach to controlling levels of bTB in badgers and cattle than the 'blanket cull' proposed in the 'core areas.'

The culling of a badger with confirmed, advanced bTB is something we could accept as humane, responsible and a means of improving the health within the badger population.

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 of 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. The risk of non-vaccinated cubs testing positive was reduced by almost 80 percent when more than a third of badgers in their group had been vaccinated'.

This methodology is currently being rolled out by the Welsh Government and we think that this approach would be the best option in Northern Ireland.

We believe badger vaccination is the long-term solution to the issue of bTB in wildlife and urge the Department to prioritise and support any research into an oral bait vaccine for badgers.

3. Legislation needs to be introduced urgently to allow laypersons to be trained in badger vaccination.

We ask the Department to bring forward legislation that would allow laypersons 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.

4. We welcome the greater focus on cattle testing, biosecurity improvements and improvements to herd health

Our view is that badgers are only a very minor part of the bTB infection chain. A clear link between a reservoir of bTB infected badgers and the transmission of the disease to cattle has NOT yet been conclusively scientifically proven.

Biosecurity improvements, controls on cattle movements and improvements to herd health are important elements of the solution and we are encouraged to see these included in the proposals. It is in everyone's interest to effectively control bTB. The Farm Business Improvement Scheme potentially has an important role to play in encouraging farmers to upgrade their biosecurity measures on the farm.

5. Further research is needed to understand and better inform future policy.

We urge the Department to prioritise and support research into an oral bait vaccine for badgers and to continue to work in partnership with DEFRA with regards to the development of a usable vaccination for cattle in medium to long term.

Read our full response to DAERA's consultation entitled, **Bovine Tuberculosis Eradication Strategy for Northern Ireland.**

References

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