



NFYFC AGRI's Response to Defra's Bovine TB Consultation

Defra's Bovine TB: consultation on proposals to manage the delivery of both badger vaccination and culling in Edge counties. A consultation exercise contributing to the delivery of the government's strategy for achieving Officially Bovine Tuberculosis Free (OTF) status for England

The National Federation of Young Farmers' Clubs (NFYFC) represents a diverse group of people who share an interest in a vibrant and sustainable countryside. YFC members also share a keen interest and play an active part in future food production, farming and land management. Future career opportunities within the food, farming and allied industries are of great importance and significance.

The current bTB situation is recognised as having multiple detrimental effects for wildlife, cattle, farmers and wellbeing. An increased workload for vets and farmers as well as a continual expense for tax-payers. Next generation farmers and our current farming members need optimum working and productivity conditions to succeed in these challenging times and welcome an opportunity to express views in response to Defra's bovine TB consultation. We understand that the aim of the proposal is 'to manage the deployment of both vaccination and culling in the Edge Area to incentivise greater use of disease prevention methods'¹. In summary:

- Defra aims to reduce the risk of vaccinated badgers being culled through preventing culling in zones surrounding vaccination sites.
- An alternative or additional option is to have a cage-trapping only zone for culling so that vaccinated badgers can be identified and released. APHA will evaluate methods of marking badgers which have the potential to last for several months. If APHA's evaluation identifies a successful method, this option could be introduced in 2021.²

Our considered and collaborative comments to the suggestions will highlight a range of practical experience and scientific expertise that we believe will help to achieve minimisation and prevention of the disease.

The NFYFC Agriculture and Rural Issues (AGRI) steering group, made up of regional representatives within England and Wales, are responding on behalf of the YFC members they represent with the understanding that this consultation is for England only. The group's AGRI Ambition document highlights aims for a vibrant rural future. The national group of regional YFC representatives also continues to support measures for the eradication of bovine TB, a disease that has wide-spread implications for farming members, their families and animal welfare.

¹ Defra: Bovine TB: consultation on proposals to manage the delivery of both badger vaccination and culling in Edge counties <https://consult.defra.gov.uk/animal-health-and-welfare/badger-no-cull-zones-edge-area/>

² NFU: Defra TB consultations: Edge Area wildlife control: <https://www.nfuonline.com/sectors/animal-health/animal-health-rh-panel/bovine-tb/bovine-tb-news/defra-tb-consultations-edge-area-wildlife-control/>



We note that within the consultation document that:

- The evidence shows that, where TB is present in badgers, there is an increased risk of the disease spreading from badgers to cattle. The scientific consensus, summarised in Professor Charles Godfray's independent restatement of the evidence base in 2013, is that TB spreads within and between populations of badgers and cattle. The disease spreading from badgers to cattle is an important cause of herd breakdowns in high-incidence areas. (Supported by an eLife [study](#)³ released in 2019.)
- A report by Downs et al. published in October 2019 showed that intensive culls are reducing the incidence of bTB in cattle. Detailed analysis of the effect of the current culls has shown that culling implemented by the farming industry can result in statistically significant reductions in the incidence of bTB. They found that culling was associated with reductions in herd bTB incidence of 66% and 37% in the first two intensive cull areas over the first four years relative to matched comparison areas with no culling.
- Lab-based studies were carried out to enable the licensing of BadgerBCG10 in 2010. These studies found that vaccination of badgers reduced the severity of disease. A study using vaccine in the field also suggested that vaccination reduces the severity and progression of TB in badgers. An indirect protective effect (akin to a "herd immunity" effect) was also demonstrated in this study. The level of indirect protection to unvaccinated cubs increased with the proportion of vaccinated adults in the social group. (However, an Animal & Health Plant Agency 2019 [study](#)⁴ summarises that badger vaccination had no effect on bTB incidence within cattle.)
- Models investigating different policies for badger control suggest that trapping and vaccinating 70% of the population is required to give long-term decreases in cattle incidence when accounting for the efficacy of BCG.
- Badgers in undisturbed populations within England live in territorial social groups: social group and territory size varying according to the environment. This population structure restricts the distance that badgers generally move each day. After culling takes place, it has been demonstrated that the territorial social structure is disrupted, and the distances badgers move each day increases and increased trap rates are seen within 200m of un-culled areas.⁵

³ eLife: Combining genomics and epidemiology to analyse bi-directional transmission of *Mycobacterium bovis* in a multi-host system: <https://elifesciences.org/articles/45833>

⁴ A&PHA: A descriptive analysis of the effect of badger vaccination on the incidence of bovine tuberculosis in cattle within the Badger Vaccine Deployment Project area, using observational data:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/548140/bvdp-badger-vaccine-report.pdf

⁵ Defra: Bovine TB: consultation on proposals to manage the delivery of both badger vaccination and culling in Edge counties <https://consult.defra.gov.uk/animal-health-and-welfare/badger-no-cull-zones-edge-area/>
National Federation of Young Farmers' Clubs (England and Wales) **48-Final-AGRI-20 bTB**
YFC Centre, 10th Street, Stoneleigh Park, Kenilworth, Warwickshire CV8 2LG
tel 024 7685 7200 fax 024 7685 7229 email post@nfyfc.org.uk web www.nfyfc.org.uk



**Fun, Learning and
Achievement**

Having consulted with our regional representatives and the National Farmers Union (NFU) our considerations are as follows:

NFYFC AGRI continues to support measures for the eradication of bovine TB, but does not support the proposal measure of introducing no-cull buffers for vaccination sites within the Edge area. The rationale for this opinion is that this has the potential to disrupt effective and much-needed control of bTB which is the main objective of industry and government working together on this issue. NFYFC AGRI reiterates that the eradication of the disease is of the utmost importance for a range of reasons which includes: animal welfare; cost to the tax-payer; improved productivity; well-being and good business practice. For this reason, we support the most effective and scientifically-proven means (culling) of controlling the spread of bTB in areas of high disease to control the spread or rising infection. There is not clear evidence that vaccination will eliminate the transmission risk in badgers or cattle in areas where the disease is prevalent. Vaccination has a place within the eradication strategy but not in areas of high density of disease. NFYFC AGRI has played an active role in advertising Defra and industry's agreed preventative measures to help combat bTB and our members understand the importance of their role for eradication of the disease. However, there is no support for the proposed measure of protecting vaccination areas with the Edge area through no cull buffer zones. NFYFC AGRI supports the most effective and timely eradication of bTB disease and the Defra proposal does not support this.

NFYFC AGRI
June 2020