

Response submitted by www.bovinetb.info to the consultation on guidance to Natural England on licences to control the risk of bovine tuberculosis from badgers. (Submitted 23Sep2015)

The following questions

[START OF QUESTIONS]

We would be grateful for your views on altering the duration of the culling period. This would involve amending the Guidance to Natural England, which would give greater prominence to Natural England's discretion whether or not to take action to terminate culling on a case-by-case basis through ongoing assessment of the length of the relevant cull.

We would be grateful for your views on reducing the minimum area size in which culling could be licenced to take place to 100km².

We would be grateful for your views on removing the 70% land access requirement from Defra's Guidance to Natural England, and retaining only a requirement that approximately 90% of land in the cull area should be accessible or within 200m of accessible land.

[END OF QUESTIONS]

were answered as follows,

[START OF ANSWER]

I am unable to answer this question because my answer would be influenced by the size of the perturbation effect and there is considerable doubt as to the size of these effects in the pilot areas.

The most thorough trial set up to investigate badger culling effectiveness and perturbation is the RBCT. In my view the confidence of results obtained from that trial is low on account of the limited cattle data which has been published in RBCT areas. I am specifically referring to

(a) the total absence of any cattle prevalence data and

(b) limited pre-cull data which was used as reference to adjust cattle incidence for the difference between incidences in areas under investigation and their survey-only areas. Adjustments made in the proactive adjoining lands have had pivotal impact on detrimental incidence increases during and after the culls in the RBCT.

If in the course of time, perturbation attributed to RBCT areas, and hence the pilot areas, is found to be substantially over-estimated, in my view DEFRA is running the risk that it will be partly responsible for that failure. This will be largely due to its reluctance to sanction the release of important data needed to properly assess badger cull impact.

Further details are given at <http://www.bovinetb.info/simple-analysis-of-rbct-data.php>

[END OF ANSWER]