



Tonio Borg,
MEMBER OF THE EUROPEAN COMMISSION,
RUE DE LA LOI 200 - B-1049 BRUSSELS.

12th Dec 2014

Dear Commissioner Borg,

Ref. Release of repaired badgers into the wild by wildlife sanctuaries in Great Britain

I note that in recent years the European Union have significantly contributed to funds directed at efforts to control TB in the UK. In view of this are you aware that there is no official regulation or monitoring of the release of badgers from wildlife sanctuaries into new areas in Great Britain? The voluntary protocol which has been drawn up to cater for this activity in Reference 1 is referred to as follows in Reference 2. This protocol was drawn up in 2003 and is currently referenced by the Badger Trust in Reference 3.

[START OF EXTRACT]

About 70 badgers each year were reported in 2007 to be released by the wildlife rescue centre called Secret World. In 2003 a voluntary Badger Rehabilitation Protocol was drawn up by

Secret World Wildlife Rescue
National Federation of Badger Groups and
The Royal Society for the Prevention of Cruelty to Animals

Although it recommends testing badger cubs, it says the following regarding the testing of adult badgers.

An adult badger should not be blood tested for bovine TB for the following reasons:

It will be released to its original location, so eliminating the opportunity for the spread of disease to new areas;

Recent published data show that a single blood test is unreliable (Forrester et al., 2001);

It is unlikely to be held in captivity long enough to conduct three blood tests.

The above extract refers to the release of untested adult badgers. The following extract refers to the release of badgers raised as cubs which the protocol does recommend testing. The RBCT Final Report described the ELISA badger test (or Brock test) as having low sensitivity which severely constrained abilities to identify and remove infected social groups. The protocol recommends applying this test 3 times to improve the detection rate.

Because badgers are highly social and territorial animals the release is not simple, by the time the cubs are ready for release they will not be able to be returned to where they were found, if that is known, because they will be treated as aliens by the resident badgers, at best being driven off and at worst killed, this means that a release site for the entire site has to be found.

[END OF EXTRACT]

Although it is recommended to triple test cubs, if the sensitivity of each test is assumed to be about 40%, 1 in 5 infected cubs are missed. If these cubs are being released into new areas this may be seeding TB directly into wildlife in dean areas.

The farming industry in the UK is being put under increasing burden with restrictions resulting in ever poorer returns in terms of TB reductions. In my view, allowing unregulated releases of potentially infected badgers to directly seed the badger population in dean areas (particularly with no monitoring) is in my view out of proportion to restrictions being placed on the farming industry. In fact such releases may to a certain extent be undermining efforts to control TB which member states are helping to fund.

I note that in the autumn of last year the FVO audited the UK on efforts being made to eradicate TB in each country within the UK. As far as I am aware the findings during this audit have yet to be published.

Yours sincerely,

A large area of the document is redacted with a solid black box, obscuring the name and contact information of the sender.

References

1. <http://www.bovine.tb.info/docs/Badger-protocol.pdf>
2. <http://www.bovine.tb.info/#sanctuaries>
3. <http://badgertrust.org.uk/badgers/injuriesorphansrehab.aspx>