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Date: 24.06.20

Dear Hardyal

Re: DEFRA's badger-no-cull-zones-edge- area consultation.

My letter to you is prompted by the Derbyshire Against The Cull open letter you recently received, as I wish to address some of its inaccuracies, as I am sure you would wish to have full knowledge of the facts.

Last year 43 cull areas operated in England and although it is an overused phrase these equated to an area approximately the size of Wales. Culling has taken place in some areas since 2013 and there has not been an issue with safety. All operatives are fully trained, including how to avoid confrontation. The suggestion therefore, that there is a risk from, 'one of these groups will be carrying high powered firearms' is totally unfounded.

It is open to debate that Derbyshire is the largest vaccination programme in England. In 2019 they did not vaccinate as many as Cornwall, who achieved 159 badgers compared to Derbyshire at 155. Please note these are figures published by DEFRA and the Derbyshire figure is lower than the DWT claimed figure. It is true that Derbyshire's licenced area is the largest, but it includes a lot of moorland which is not really badger territory. However, it is vital to understand there are only two small vaccination areas within the proposed cull area in Derbyshire. Based on the size of these it is unlikely that more than 20 badgers were vaccinated within the cull area in 2019. The exact area where the badgers have been vaccinated is not published but the main vaccination sites, the DEFRA subsidised Badger Edge Vaccination Scheme (BEVS) areas, are well away from the proposed cull area; the ones inside are privately funded.

It is untrue to claim Derbyshire is unique as there are several other counties where culling and vaccination occur in adjacent areas.

The claim that no-cull zones will be difficult to enforce is scare mongering, as all free shooting contractors are fitted with trackers, monitored and they have to record the location of all kills.

Clearly, if no-cull zones are introduced then vaccination groups and cull operators will know where they are otherwise how do you operate a zone? The enforcement and policing of the 1992 Badger Protection Act in those zones will be the same as anywhere else. Location of cull areas are not currently published, but the police are able to enforce the Act. Failure to adhere to cull licence conditions jeopardises that licence.

It should be understood that where bTB is endemic in the badger population, as it is in the west of Derbyshire, culling will be the most effective way of reducing and then eradicating bTB from cattle and badgers. Culling is working elsewhere in England. For example, in Gloucestershire and

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Somerset where culling started in 2013, a peer reviewed study published in 2019 that looked at the first four years of data, known as the Downs Report, showed impressive results. By reducing the badger population by 70% the incidence of new herd infections was reduced by 66% in Gloucestershire and 37% in Somerset. (Summary available [here.](#))

As yet no similar scientific evidence has been produced to show the effect of badger vaccination on cattle bTB incidence. A vaccine will not cure an infected animal and so it is felt by most people involved in tackling bTB, that it could have a role where it is believed bTB is not endemic in the badgers, hence the Badger Edge Vaccination Scheme (BEVS) that has been trialled in Edale, Eastern Moors and some others areas in Derbyshire. However, in the west and south of Derbyshire, DEFRA's Animal & Plant Health Agency (APHA), farmers and local vets believe badger population reduction is required.

The cost of badger culling and vaccination are very similar as it involves the same amount of work, the only difference is policing costs. Vaccination is subsidised but culling, apart from the monitoring and policing is fully paid for by farmers.

APHA vets, who visit every bTB breakdown and delve into each farms cattle trading history, its biosecurity and presence of badgers, believe that 77% of new bTB breakdowns in Derbyshire are due to infection passing from badgers, second only to Cornwall in England. (Source doc. [here.](#))

We believe culling to reduce the badger population by 70% has to continue as part of the Governments bTB control strategy. Derbyshire should not be treated differently to any other county with high incidence of bTB. Cheshire, where culling is entering its fourth year in one area and second year in another has the same Edge Area status and has similar badger vaccination taking place within its cull zones as the proposed cull area in Derbyshire.

Derbyshire can be a study area for seeing how vaccination and culling can exist in the same county. Large scale vaccination should be in the north and east of the county, in areas where APHA believe bTB is not endemic in the badgers, but in the west and south culling must be allowed to take place.

The spread of bTB from west to east in England will not be halted if Derbyshire, which is on the leading edge, is not allowed to be part of the cull program that already covers over 50% of the High-Risk Area of England.

In the past you have stated you will not stand in the way of government policy on bTB control when it comes to policing operations and I would ask you to maintain that stance. I would also urge you to go further and review your stance on badger control, as the Downs Report, with positive evidence of the impact badger population reduction is having on bTB incidence in cattle, has been published since you took your view.

Should you have any queries please do not hesitate to contact me and if you have detailed scientific questions, I can refer those to a vet, who will provide you with an answer. Sarah Tomlinson MRCVS is a member of the government's own TB eradication and advisory group and technical director of the national TB Advisory Service.

Yours sincerely



Andrew Critchlow
Derbyshire NFU County Adviser