

Preparing for a new GB strategy on bovine tuberculosis and the Independent Scientific Review of the Randomised Badger Culling Trial and Associated Epidemiological Research. Godfray HC et al, March 2004.

Response of the Deer Initiative

Introduction

The Deer Initiative (DI) is a wide partnership of statutory, non-statutory, voluntary and private interests. Whilst originally set up by the Forestry Commission and still, in the main, funded by the Forestry Commission and English Nature, it has a core staff whose activities are both to co-ordinate the relevant activities of the partners and to deliver some functions directly.

The aim of the DI is *“to ensure the delivery of a sustainable, well managed wild deer population in England and Wales”*. The staff and finances of the DI are managed through the DI Ltd, a charitable company limited by guarantee, dedicated to supporting the DI. This response reflects the views of the staff of the DI, our partner organisations will respond separately.

General Comments

- We note that we were not included in the original list of consultees and would ask that we are included in any future discussions on this subject. This response reflects our response to the recent Defra Wildlife Integration & Conservation Team consultation on ‘Achieving the sustainable management of wild deer in England.’ We assume that the relevant sections of other organizations responses to that consultation will also be considered during this consultation.
- We have also responded separately to the Environmental, Planning and Countryside Committee of the National Assembly for Wales’ inquiry into Bovine Tuberculosis (*M.bovis*)
- The evidence currently available to us suggests that TB infection in wild deer is not currently widespread or common. In fact, we believe that deer are likely to become vectors or reservoirs only in exceptional circumstances and when the deer population density is unhealthily high. However, we believe that TB policy and strategy should take into account the possibility that in some limited areas wild deer may play a role in the epidemiology of the disease.

Responses to individual questions:

Establishing a vision (Paragraph 4.3.9):

Question 1: *Bearing in mind we are looking at what we might achieve in terms of bovine TB controls in the next 10 years, do you agree that the most realistic target has to be to contain and progressively reduce spread, incidence and economic costs of the disease and to continue to develop the science base to inform future strategy?*

Response: We fully support the above vision and would stress the need for a Government led partnership approach to achieving the target. We strongly believe that any future policy must be based on sound scientific information particularly on transmission routes between species and the role of wildlife as a reservoir for the disease.

Question 2: *In defining what we hope to achieve in terms of bovine TB disease control, to what extent should this be regionally differentiated to reflect the distribution of the disease?*

Response: All species of deer, except Chinese water deer are increasing in numbers and expanding their ranges in England and Wales. Fallow, roe and muntjac deer are now widespread, while red and sika are locally abundant.^{1,2,3,4} It is now believed that deer of at least one species are present in nearly every 10 kilometre square of Great Britain.⁵ The geographic range of deer species has been increasing by between 1-5% annually for the last 40 years.⁶ Researchers believe that there is currently no reason why the trend in increasing deer numbers and range expansion should not continue.⁷ If this is the case the increasing population and the greater spread of wild deer will inevitably increase as will the risk of the transmission of the disease.

In England, UK herds of red, fallow and sika are frequently in close proximity to farmed livestock, grazing the same pasture and feeding on the same crop fodders. Although bovine TB has been reported in the smaller deer (roe, muntjac

¹ TROUT R.C., PUTMAN R.J., MOORE N., & HART J, (1994) *A Review of Lowland Deer*, Report VC 0308 to Countryside Division LUCC, MAFF, London.

² PUTMAN R.J. (1995) *Status and Impact of Deer in the Lowlands and Options for Management*. Technical Report to MAFF Contract VC 0316.

³ ALBON S. et al (1998) Desk and Limited Field Studies to analyse the major factor influencing regional deer population and ranging behaviour. Technical Report to MAFF Contract VC 0314.

⁴ HARRIS S., MORRIS P., WRAY S. & YALDEN D.W. (1995) *A Review of British Mammals: Population estimates and conservation status of British mammals other than cetaceans*. Joint Nature Conservation Committee, Peterborough; 168pp.

⁵ MAYLE B.A., & STAINES B.W., (1997) *An Overview of Methods Used for Estimating the Size of Deer Populations in Great Britain*, from Population Ecology, Management and Welfare of Deer, Proceedings of a symposium held in Manchester, April 1997, Manchester Metropolitan University.

⁶ GILL R.M.A., (2001) The deer explosion. *Tree News*, Autumn 2001 p22-25.

⁷ FULLER R & GILL R, (2001), Ecological impacts of increasing numbers of deer in British woodland. *Forestry* 74, p193-200.

Chinese water deer), the most frequent reports and serious concentrations of infection have occurred in wild fallow park herds of red, sika and reds.

Young adult deer, particular young red and sika stags and fallow bucks are the individuals most likely to travel considerable distances and also appear particularly vulnerable to TB infection.

We believe therefore that wild deer are unique in that their ranges are expanding naturally and in many cases across regional boundaries. Any strategy for dealing with TB in the national wild deer herd must therefore reflect this. It must also reflect cross national requirements, since we are aware of evidence of TB infection in wild deer in the Hereford/Gloucester area which may potentially impact on deer in Wales.

We would specifically wish to see some acknowledgement of the need to monitor deer distributions and densities and the role of the Tracking Mammals partnership. We would wish to see Government funding for this work and in particular for the development of a GIS based predictive model for future expansions.

Question 3: *How should the interests of wider society, and the principles of sustainability be recognised in a 10 year vision for bovine TB?*

Response: The DI partnership is committed to sustainable management of our national wild deer herd through a collaborative approach on a landscape scale. The list of key players in Para 4.3.2 is focused on domestic stock and thus misses the fact that deer have a wider value. Except for park deer there is no identifiable 'livestock keeper' but they may be a significant revenue generator for a landowner upon whose ground deer can be 'taken or killed'. Any disease control strategy must acknowledge the role of the 'occupier or shooting tenant' who has the right to take or kill the deer. Without their active cooperation a significant gap in both monitoring and control may occur. The DI addresses this issue through the inclusion in our partnership of landowner, farming and shooting organizations.

Rationale for Government intervention (Paragraph 4.4.10)

Question 4: *Does Government need to intervene in the control of bovine TB? If so, why, and to what extent? If not, why not?*

Response: Whilst it is unlikely that there is a significant risk to the national wild deer herd from TB there are significant welfare issues for herds at a local level and also the risk of illegal persecution of deer by farmers who believe that TB in wild deer may pose a threat to their domestic stock. We believe that this is already occurring in local areas in England. We therefore believe that there is a role for Government to intervene in the control of bovine TB, but any such intervention must be in collaboration with the key stakeholders and with general acceptance by wider society.

Balancing costs, benefits and risks (Paragraph 4.5.8)

Question 5: *Who in your opinion are the main beneficiaries of current bovine TB controls and how should costs be shared between these beneficiaries?*

Response: Para 4.5.6 reflects the current protection of badgers and highlights the need for farmers to 'tolerate a wildlife species which presents a threat to his livelihood'. We would not wish to see wild deer cast in the same light. Once again we would highlight the need for a partnership approach. We accept that 'there should be a fair division of costs between farmers (and other landowners?) and the taxpayer.' However in the wild deer 'industry' it is difficult to tease out who are the beneficiaries. This was highlighted by discussions on traceability to provide additional surveillance through carcass tagging. A paper was produced by the DI in 2001. At the time the partners agreed that a voluntary approach was appropriate but despite vigorous efforts sufficient funding to introduce such a scheme was unsuccessful. We now believe that for such a scheme to be successful government funding must be made available.

Development of future policies (Paragraph 4.6.6.)

Question 7: *Do you agree that, in the light of current evidence, policies should be developed (including badger culling) that seek to control transmission of bovine TB between badgers and cattle?*

Response: The Godfray Report recommends that DEFRA TB policy assumes that badgers are a significant wildlife reservoir of disease (5.5.1). Whilst the possible involvement of badgers has received much attention and investigation, current policy and legislation appears to restrict objective scientific investigation of the possible role of wild deer in some TB hot-spots

Effective partnership and governance of a new TB strategy (Paragraph 4.10.6)

Question 14: *What could 'effective partnership' mean in relation to bovine TB and what contribution could your organisation make to this?*

Response: The DI is an example of a partnership approach that has tried to encompass the full range of organisation that have an interest in wild deer. The full partners are listed at Annex A. Each of the partners agrees to abide by a series of principles set out in an Accord, a copy of which is attached at Annex B. Whilst wild deer will hopefully remain a minor part of the TB strategy we would be keen to be involved in developing the future strategy and especially in disseminating the outcomes through our partners and to the general public.

Question 15: *What should be the Governance arrangements for a new TB strategy?*

Response: We would support the role of a Government led TB forum (possibly with an independent Chair) and would welcome the opportunity to making an active and positive contribution to the new strategy.

Question 16: *Should the remit of the TB Forum be recast, for example, to have a focus on communicating results of the research programme as recommended by EFRAC?*

Response: We believe that any strategy without feedback discourages landowners and deer managers. We would therefore urge a greater visibility of findings in the form of feedback to Deer Management Groups and other membership organisations.

Dealing with emerging hotspots (paragraph 5.3.36)

Question 21: *How effective do you think the new proposals for the early detection of prevention of developing TB hotspots will be?*

Response: The new proposals are all aimed at domestic stock with no recommendations for increased monitoring of wildlife, in particular wild deer. Under the current Orders it is mandatory for any suspicion of TB in **any** deer (whether farmed, park, or wild) to be reported to DEFRA, but the powers of control arising from the confirmation of infection apply only to enclosed premises. DEFRA has no power to investigate the possibility of infection in wild deer, even if TB positive carcasses are reported and investigated. There are no enforceable means by which DEFRA can assess the level of TB infection in a given wild population, once the presence of TB has been confirmed from post mortem submissions. We believe that In view of the transitory nature of some of the deer species, monitoring and if necessary investigation, of TB in wild deer is essential. We would suggest that there is a need for a structured, Government funded, monitoring regime for wild deer to support the new proposals outlined in Para 5.3.36.

Peter Watson
Director (Technical & Policy)
The Deer Initiative
3 June 2004