



**CONSULTATION ON POTENTIAL
WILDLIFE INTERVENTION OPTIONS AS
PART OF THE BOVINE TUBERCULOSIS IN
NORTHERN IRELAND BLUEPRINT FOR
ERADICATION**

ULSTER FARMERS' UNION RESPONSE

October 2026

Contents

1. Introduction.....	3
2. Badger Populations and Biodiversity.....	5
3. Additional Scientific Evidence.....	6
4. Options analysis rating and scoring system.....	9
5. Rationale for Wildlife Intervention as part of the Blueprint for Eradication.....	12
6. Non-Selective Culling Options	14
6.1 Non-Selective Cull using Controlled Shooting of Free-Roaming Badgers	14
6.2. Non-selective Cull using Baited Cages.....	16
6.3 Non-Selective Cull using Stopped Restraints	18
7. Test and Vaccinate or Remove (TVR)	21
7.1 TVR using Baited Cages	21
7.2 TVR using Stopped Restraints.....	24
8. Vaccination Only Options	25
8.1 Vaccination Only using Baited Cages	25
8.2 Vaccination Only using Stopped Restraints	28
9. Delivery and Funding approaches for Wildlife Intervention	29
9.1 Private Sector Delivery of Wildlife Intervention	29
9.2 Private Sector Funding of Wildlife Intervention	31
10. Lay Vaccination	33
11. Ethics and Disability Duties	34
12. Bovine Tuberculosis in Northern Ireland; Blueprint for Eradication	35
13. Conclusion	36

1. Introduction

The Ulster Farmers' Union welcomes the opportunity to respond to the Consultation on Potential Wildlife Intervention Options as part of the Bovine Tuberculosis in Northern Ireland: Blueprint for Eradication.

The Ulster Farmers' Union is the largest farming organisation in Northern Ireland, representing over 12,000 members from all agricultural sectors and farm businesses across the province. As a representative body for many of the livestock producers in Northern Ireland, the outcome of this consultation is of significant importance to the UFU and its membership, who continue to bear the economic, emotional and practical consequences of bovine tuberculosis (bTB) on a daily basis.

Bovine Tuberculosis remains one of the most serious and persistent animal health challenges facing Northern Ireland. Despite more than six decades of disease control efforts, bTB continues to impact farm businesses, compromise animal health and welfare, and place a substantial financial burden on both farmers and the public purse. As those amongst who are most directly affected by the disease, our members have a strong interest in ensuring that the measures adopted as part of the Blueprint for Eradication are evidence-based, effective and capable of delivering meaningful progress towards eradication.

Research undertaken by the Andersons Centre on behalf of the Dairy Council for Northern Ireland, the UFU and the Livestock and Meat Commission estimated that the indirect cost of bTB to Northern Ireland farmers is approximately £96 million per year. When combined with DAERA's direct expenditure on compensation, testing and disease control measures, the total annual cost of bTB to the agricultural industry is estimated to be approximately £156 million per year.

However, the impact of bTB extends far beyond its financial costs. Herd breakdowns result in movement restrictions, the loss of productive animals, disruption to breeding programmes and significant uncertainty for farm businesses. Farmers also face wider environmental consequences associated with prolonged disease outbreaks.

Importantly, bTB continues to have a considerable human impact. The stress and anxiety associated with recurring herd breakdowns, repeated testing requirements and ongoing uncertainty place a significant burden on farming families and rural communities. For many UFU members, bTB is not simply an animal health issue but a major business, welfare and mental health concern.

The UFU therefore welcomes DAERA's decision to consult on potential wildlife intervention options. Given the scale of the economic, environmental and social impacts of bTB, and the continued prevalence of the disease despite longstanding cattle-based control, the UFU believes it is appropriate that all evidence-based measures capable of

contributing to eradication are fully considered. The overriding objective must be to implement a strategy that delivers a significant and measurable reduction in disease prevalence within the shortest possible timeframe, thereby reducing the burden on farmers and moving Northern Ireland closer to the long term goal of bTB eradication.

2. Badger Populations and Biodiversity

Are there any comments that you wish to raise regarding the HRA Report?

Large badger populations have been shown anecdotally, and scientifically, to have unintended negative effects on local biodiversity, particularly on ground-nesting birds and other vulnerable wildlife. While badgers are a protected native species and form an important part of the ecosystem, there is evidence that they can exert significant predation pressure on certain species and should therefore be considered within broader biodiversity management policies.

Badgers are opportunistic omnivores and are known to consume bird eggs, chicks, small mammals, amphibians, reptiles and invertebrates. A review of more than 2,000 monitored bird nests across Britain found that mammals, particularly foxes and badgers, were among the principal predators of ground-nesting bird nests, including species such as curlew and lapwing.

There is particular concern for species that nest on or near the ground. The British Trust for Ornithology notes that badgers regularly consume eggs and chicks from ground nests and that changes in badger abundance have the potential to affect breeding bird populations through direct predation and wider ecosystem interactions. Although large-scale studies have not always detected clear population-level impacts on birds, some species such as skylark and lapwing have shown responses that warrant further investigation and monitoring.

Evidence regarding hedgehogs is stronger. Badgers are widely recognised as the main natural predator of hedgehogs in the UK. Multiple national and local studies have found a negative relationship between badger abundance and hedgehog numbers, with hedgehogs generally being more abundant where badger activity is lower. During the Randomised Badger Culling Trial, hedgehog populations in some habitats reportedly doubled following reductions in badger numbers.

The NatureScot literature review on badger impacts concluded that badgers could predate ground-nesting birds and have significant negative impacts on hedgehogs in some parts of England, although effects may vary depending on local conditions and habitat.

For these reasons, conservation and wildlife-management decisions should consider not only the welfare of badgers but also the cumulative impacts on other species of conservation concern. Any policy should be based on robust local ecological evidence, regular monitoring, and an objective assessment of the needs of all wildlife species. Protecting biodiversity requires maintaining a balance between species rather than focusing exclusively on any single protected animal.

3. Additional Scientific Evidence

Based on the scientific evidence that has been provided in Annexes V to VII, is there any additional scientific evidence the Department should also consider?

Yes. Recent research from Queen's University Belfast provides additional scientific evidence that is relevant to the case for badger population management, as it suggests that badger numbers and densities in Northern Ireland may be substantially higher and more widespread than previously estimated.

Using direct thermal imaging surveys with night-time binoculars and drones across 64 one-square-kilometre study areas between 2023 and 2026, researchers found badgers to be present across all land classes, including mountain habitats that had previously been considered less suitable for the species. The study also detected badgers in several locations that earlier surveys had classified as badger-free.

The thermal surveys recorded badger densities ranging from 0 to 18 badgers per km², with the highest-density areas supporting between 12 and 18 badgers per km² (mean 14.25). These hotspot densities were reported to be three to five times higher than previous estimates based on indirect survey techniques. Across 50 randomly selected areas surveyed before cubs were born, densities ranged from 0 to 12 badgers per km², with an average of around 3 badgers per km² where badgers were present.

Importantly, the research found that traditional indirect methods of estimating badger populations consistently produced lower density estimates than direct thermal surveys. This suggests that previous assessments may have underestimated badger abundance and distribution in Northern Ireland.

Observations whilst carrying out the thermal imaging studies also found that badgers sometimes urinate and defecate outside communal latrine sites, on areas such as grass rows for silage and bale collections and around hedgerows, suggesting additional opportunities for environmental contamination. In areas where infected badgers are present, this behaviour could represent a potential pathway for bovine tuberculosis transmission and warrants further investigation. Scientific evidence has shown that indirect contact with infected faeces can be a significant pathway for disease transmission from badgers to cattle and from cattle to badgers, and this new visual evidence suggests that activities such as fencing off latrines would likely not have a significant impact on cattle infection levels. (King et al., 2015; Drewe et al., 2013).

If badgers are accepted as a significant wildlife reservoir for bovine tuberculosis, evidence of higher-than-previously-estimated local population densities may be relevant when considering the potential contribution of badgers to disease persistence and transmission.

The potential ecological implications of exceptionally high badger densities, including possible effects on species such as hedgehogs, pollinators and ground-nesting birds, should be assessed through further research and considered within any wider wildlife management framework.

Reports of agricultural impacts, including crop damage attributed to badgers, suggest that further assessment may be warranted to better understand the scale, distribution and economic consequences of such impacts for landowners and farmers.

Population densities recorded in parts of Northern Ireland appear higher than those reported in some European jurisdictions where badger populations are subject to management measures. Any comparison between jurisdictions should, however, take account of differences in habitat, survey methodologies, management objectives and legal frameworks. The Bern Convention (1979) permits derogations from species protection requirements in defined circumstances, including where there is no satisfactory alternative and where conservation status is not adversely affected. These provisions have been used by some European states, such as Germany, to facilitate wildlife management measures, demonstrating that badger population control can be compatible with wider wildlife conservation obligations where justified.

Under the Wildlife (Northern Ireland) Order 1985, wildlife licences may be granted by the relevant authority in specified circumstances, including for the prevention of serious damage to agriculture, livestock or property, the protection of public health and safety, and disease prevention or control. Such interventions are subject to statutory conditions and regulatory oversight.

The Diseases of Animals (Northern Ireland) Order 1981 provides powers relating to disease prevention and eradication, including powers that may extend to wildlife where considered necessary for disease control purposes. Any such measures would need to be implemented in accordance with the relevant legislative requirements.

Taken together, these findings indicate that badgers are more numerous, more widespread and locally more concentrated than previously believed. If badgers are accepted as a significant wildlife reservoir for bovine tuberculosis, then evidence of higher-than-expected population densities could be considered supportive of arguments for targeted badger culling or population management measures, particularly in high-density hotspot areas where the risk of disease transmission may be greatest. However, the findings primarily provide evidence on badger abundance and distribution rather than directly demonstrating the effectiveness of culling itself, which would still need to be assessed through disease-control studies.

During the PhD projects referenced above carried out at Queens University Belfast, the researchers have also carried out tests on badger faeces to determine whether badgers are shedding live, viable *Mycobacterium bovis* in their faeces, using a novel Phago-

magnetic separation – quantitative PCR method developed at QUB. Recent research from Queen's University Belfast has demonstrated the feasibility of using this novel bacteriophage-based PhMS-qPCR assay to detect viable *Mycobacterium bovis* directly from cattle blood samples (Dane et al., 2026). Unlike the current SICCT skin test, which relies on measuring the host immune response, the assay seeks to identify live bacteria and therefore has the potential to detect infected animals that may otherwise remain undetected. The study also identified unexpectedly high levels of *M. bovis* infection and *M. bovis*-MAP (*Mycobacterium avium* subspecies *paratuberculosis*) co-infection in cattle at slaughter, providing evidence that current surveillance methods may not be identifying all infected animals. Although the assay requires further development and validation, it represents a promising technology that could strengthen Northern Ireland's bTB eradication strategy through earlier, more direct and potentially more accurate detection of infection. This novel test has been used alongside the SICCT skin test, as well as gold standard culture methods to assist with proving the accuracy, sensitivity and specificity of the test. Whereas this peer-reviewed paper only tests cattle blood for *M. bovis*, the test has proven to detect viable MAP from faeces, milk, blood and environmental samples.

The UFU feels that the use of this novel technology on badger faeces could significantly improve any wildlife intervention by identifying hotspot locations where badgers are shedding viable bovine tuberculosis into the environment. This method is also significantly less invasive than capture methods used within a TVR system, as the fresh faeces can be sampled directly from the ground and identified using thermal imaging technology. Scientific evidence demonstrates that non-invasive sampling significantly reduces animal welfare concerns by avoiding the stress, injury risk and behavioural disturbance associated with live capture and blood testing, while still enabling the monitoring of disease, health status and population-level indicators. Furthermore, faecal sampling can be undertaken more efficiently and across a wider geographic area, making it a practical and welfare-friendly approach that aligns with modern standards for wildlife research and disease surveillance.

4. Options analysis rating and scoring system

Do you agree with the rating and scoring applied in the options analysis set out at annex VIII?

The UFU agrees with much of the rating and scoring applied in the options analysis contained within Annex VIII, particularly where the assessment identifies the relative strengths and weaknesses of the principal wildlife intervention approaches. However, the UFU believes that some elements of the ranking, most notably the position afforded to Test, Vaccinate or Remove (TVR), do not adequately reflect the financial, operational and practical realities of delivering wildlife intervention measures in Northern Ireland.

The UFU strongly supports DAERA's conclusion that vaccination-only approaches represent the weakest wildlife intervention option. The evidence presented within both the options appraisal and the Chief Veterinary Officer's review consistently demonstrates that vaccination alone offers the slowest route to disease reduction and delivers the least impact on bovine TB levels when compared with interventions that include a wildlife population reduction element.

Significantly, vaccination-only options ranked at or near the bottom across strategic, economic, non-monetary and risk assessment criteria. This is not an isolated finding but a clear indication that vaccination alone performs poorly against the key objectives of reducing disease incidence, delivering value for money, achieving measurable outcomes within a reasonable timeframe and providing a practical solution to the TB crisis. In the UFU's view, these results reinforce what the evidence has consistently shown: vaccination as a standalone measure is unlikely to achieve the scale or pace of disease reduction required to address Northern Ireland's bovine TB challenge.

The low ranking of vaccination-only options also reflects the considerable practical difficulties associated with implementation. Effective vaccination programmes require sustained long-term investment, repeated annual trapping and vaccination operations, high levels of badger population coverage and many years of continued intervention before meaningful epidemiological benefits can be expected. Such programmes are costly, labour-intensive and dependent upon maintaining exceptionally high levels of operational delivery over prolonged periods. Given the severity of the current TB situation in Northern Ireland, the UFU believes that options which offer only limited and delayed disease control benefits cannot be regarded as credible standalone solutions.

In contrast, the UFU agrees with DAERA's assessment that non-selective culling options rank among the strongest interventions available. The options appraisal clearly demonstrates that private sector-led non-selective culling approaches perform exceptionally well when evaluated against cost, practicality, risk and potential disease reduction benefits. Their consistently high rankings across economic, non-monetary and risk assessments reflect the fact that these interventions are comparatively

straightforward to implement, less resource-intensive and significantly more cost-effective than many alternative approaches. The UFU considers this to be a particularly important finding. At a time when both government finances and farm businesses remain under significant pressure, interventions must be judged not only on theoretical effectiveness but also on whether they can be delivered efficiently, affordably and at scale. The high ranking of non-selective cull options demonstrates that they offer a realistic pathway towards achieving disease reduction objectives while maintaining value for money and operational feasibility.

However, the UFU fundamentally disagrees with the exceptionally high ranking afforded to Option 8, Selective Cull through TVR using restraints and delivered by the private sector. While the option achieved the highest average score across the various assessment categories, the UFU believes that this ranking overstates its suitability and fails to place sufficient weight on the significant costs and practical challenges associated with its implementation. TVR is inherently more complex and resource-intensive than non-selective culling. It requires the live capture of badgers, the deployment of testing procedures, specialist equipment, trained personnel, veterinary oversight, vaccination where appropriate, and the subsequent removal of test-positive animals. Each stage adds additional cost, complexity and logistical burden. Consequently, TVR requires substantially greater financial investment than non-selective culling options, raising serious concerns regarding value for money and long-term affordability.

The UFU also believes that the ranking does not adequately reflect the realities currently facing Northern Ireland agriculture. Farm businesses continue to operate under immense economic pressure from rising input costs, reduced profitability, market uncertainty and the ongoing burden of bovine TB. In this environment, policy interventions must be practical, scalable and financially sustainable. While TVR may perform well within a theoretical assessment framework, its complexity and cost make it considerably less attractive as a deliverable policy option.

Ultimately, the purpose of wildlife intervention is not simply to identify the option that performs best in a comparative assessment, but to identify the option that can realistically achieve meaningful disease reduction on the ground. In the UFU's view, the evidence demonstrates that non-selective culling options are better positioned to meet that objective. They deliver comparable disease control benefits, can be implemented more efficiently, require fewer resources and represent substantially better value for money.

For these reasons, while the UFU supports DAERA's overall conclusion that non-selective culling options rank highly, it believes that the first-place ranking assigned to TVR should be treated with considerable caution. Greater weight should be given to affordability, deliverability and practical effectiveness. When these factors are properly considered,

the strongest options emerging from the appraisal are the private sector-led non-selective culling approaches, rather than the significantly more expensive and operationally demanding TVR model.

5. Rationale for Wildlife Intervention as part of the Blueprint for Eradication

Do you agree with the Department that a wildlife intervention is necessary?

Yes. The Ulster Farmers' Union agrees with the Department that a wildlife intervention is a necessary and essential component of any credible strategy to eradicate bovine tuberculosis (bTB) in Northern Ireland.

This is a subject that our membership is particularly passionate about. Within our membership, the consensus is that farmers are the nation's food providers and primary custodians of the countryside. With this in mind, farmers bear no innate ill-will towards any form of wildlife and are very focused on the fact that the best way forward is to have healthy badgers and healthy cattle. They do, however, have a deep-seated loathing for TB, and after over 60 years of ever more stringent controls on farms, which have culminated in Northern Ireland having amongst the most robust bTB controls in cattle in the world and yet still making no progress towards TB eradication, farmers have long since come to the conclusion that our current TB eradication plan is only addressing one side of the TB problem and as long as it continues to do so, it is destined to continue to fail.

Scientific evidence demonstrates that badgers act as a significant wildlife reservoir of *Mycobacterium bovis*, the bacterium that causes bTB, and that transmission occurs between badgers and cattle. As a result, tackling the disease solely within the cattle population will not deliver eradication. The persistence of infection in wildlife means that cattle herds remain at risk of reinfection even where stringent cattle controls and biosecurity measures are in place.

The UFU believes that the removal of all infected badgers must form part of a comprehensive disease-control programme. Evidence from the Randomised Badger Culling Trial (RBCT), together with subsequent peer-reviewed analyses, has shown that reducing infection in badger populations can deliver significant reductions in cattle TB incidence. A 2024 re-evaluation of the RBCT concluded that proactive badger culling produced substantial beneficial effects on reducing confirmed TB herd breakdowns within culling areas.

Further evidence from England has shown that wildlife intervention programmes aimed at reducing the infected badger reservoir were associated with marked reductions in cattle TB. A peer-reviewed analysis published in 2024 found that cattle herd TB incidence rates fell significantly in areas subject to badger control measures, with reductions of up to 56% observed after several years of intervention. The authors concluded that reducing transmission from badgers is important for lowering the incidence of TB in cattle.

The economic case for wildlife intervention is equally compelling. The independent 2026 Andersons Centre report, commissioned by the UFU, Livestock and Meat Commission

and Dairy Council for Northern Ireland, found that the indirect costs of bTB borne by farmers amount to more than £96 million per year, with the total annual economic cost to Northern Ireland agriculture estimated at approximately £156 million when public expenditure is included. The report concluded that bTB is a major and persistent drag on farm profitability and that the costs will continue to persist unless decisive action is taken to eradicate the disease.

Importantly, the Andersons report highlighted that over half of these costs are carried by herds that have not even experienced a breakdown, demonstrating the far-reaching impact of endemic disease across the industry. This underlines the need for measures that address all significant sources of infection, including wildlife reservoirs.

Therefore, the UFU strongly supports the Department's view that a wildlife intervention is necessary. A successful eradication strategy must be science-led, evidence-based and contain measures that address disease transmission in both cattle and wildlife. Failure to tackle infection in badgers risks undermining progress made through cattle controls and prolonging the substantial economic, animal health and emotional burden that bovine tuberculosis places on farming families across Northern Ireland.

6. Non-Selective Culling Options

6.1 Non-Selective Cull using Controlled Shooting of Free-Roaming Badgers

Considering all the relevant factors outlined would you support the controlled shooting of free-roaming badgers as a potential Wildlife Intervention approach?

Yes. The Ulster Farmers' Union strongly supports the controlled shooting of free-roaming badgers as a potential wildlife intervention for bovine tuberculosis (bTB) control, provided it is undertaken within a robust regulatory framework, by trained and competent operators, and in accordance with strict welfare and safety standards.

The scientific evidence demonstrates that badgers are a significant wildlife reservoir of *Mycobacterium bovis* and that reducing infection within this reservoir is an important component of controlling and ultimately eradicating bTB in cattle. DAERA's scientific review confirms that badgers are the primary wildlife vector of bTB in the UK and Ireland and cites evidence that repeated large-scale badger removal programmes in Ireland reduced the risk of disease transmission to cattle herds within intervention areas.

More recent peer-reviewed evidence also supports the importance of wildlife intervention. Mills, Woodroffe and Donnelly (2024) concluded that proactive badger culling produced substantial beneficial effects in reducing confirmed cattle TB herd breakdowns within culling areas. Similarly, Birch et al. (2024), analysing data from 52 intervention areas in England, reported a 56% reduction in cattle TB incidence associated with badger control measures and concluded that reducing transmission from badgers is important in lowering disease incidence in cattle.

The UFU's primary concern is the removal of infected badgers as a source of infection for cattle. The evidence indicates that failure to tackle infection within wildlife reservoirs prolongs disease transmission, increases costs to farmers and taxpayers, and undermines the effectiveness of cattle-based controls. This is particularly relevant given the findings of the 2026 Andersons Centre report, which estimated that bTB costs Northern Ireland agriculture approximately £156 million annually, including more than £96 million in indirect costs borne by farmers.

From an economic perspective, controlled shooting offers significant practical advantages. Options involving less trapping require substantially less deployment effort and consequently incur lower operational costs. The predominant non-selective cull model based principally on controlled shooting and delivered by farmer-led private sector companies represents the lowest-cost intervention option available. According to DAERA's economic case and cost-benefit assessment, this approach ranks as the most cost-effective wildlife intervention and is forecast to deliver the highest overall benefit relative to cost compared with alternative intervention options.

The UFU recognises that welfare considerations are important in the assessment of any wildlife intervention. Controlled shooting has historically received lower welfare rankings than some alternative approaches because of concerns regarding "time to death". However, evidence gathered through rifle-mounted cameras, field monitoring and shooting video analysis has demonstrated that, when undertaken according to approved best-practice standards by trained operators, animals do not suffer for prolonged periods following shooting. Monitoring undertaken by Natural England has consistently reported high levels of contractor compliance, competency and shooting accuracy during badger control operations.

Importantly, controlled shooting may also avoid some of the welfare concerns associated with trapping-based approaches. Capture, handling, restraint and temporary confinement can cause stress in wildlife. DAERA's scientific bibliography notes that cage trapping and restraint procedures have measurable welfare impacts on badgers. In contrast, controlled shooting eliminates the need for animals to spend time confined in cages or restraints before dispatch and therefore avoids the stress associated with capture and handling.

The UFU therefore believes that controlled shooting should be considered the most viable, practical and cost-effective wildlife intervention option. While no single measure will eradicate bTB in isolation, the scientific evidence supports the view that reducing infection in wildlife reservoirs is necessary to achieve long-term disease control. Controlled shooting offers a means of delivering that objective efficiently, at relatively low cost, and with welfare outcomes that can be effectively managed through appropriate training, regulation, monitoring and adherence to best practice standards. Ultimately, if Northern Ireland is serious about reducing bTB prevalence and the enormous economic burden it imposes on farm families, the removal of all infected badgers must remain available as an important component of a comprehensive eradication programme.

6.2. Non-selective Cull using Baited Cages

Considering all the relevant factors outlined would you support a non-selective cull using baited cages as a potential Wildlife Intervention approach?

The Ulster Farmers' Union (UFU) remains firmly supportive of the implementation of a non-selective badger cull as part of a comprehensive strategy to reduce the wildlife reservoir of bovine tuberculosis (bTB) in Northern Ireland. However, while supporting a non-selective cull in principle, the UFU does not support the use of baited cage trapping as the primary or preferred capture method within such a programme. The UFU's position is based on practical, operational and economic considerations, as well as the need to ensure that any intervention delivers maximum disease-control benefit while remaining affordable, efficient and deliverable for both farmers and government.

Cage traps present significant logistical challenges when compared to alternative capture methods. Cages are large, heavy and cumbersome to deploy. Their use requires transportation by trailer alongside additional equipment, increasing both operational complexity and cost. Once in the field, traps must be dug into the ground and appropriately secured before becoming operational.

In addition, cage trapping requires an extensive baiting programme. This includes the ongoing purchase and deployment of peanuts or other bait materials, creating additional financial costs and labour requirements. Before traps can be activated, they must also be "primed" for a number of nights to encourage badgers to enter voluntarily. This further extends the overall deployment period and increases operational demands. The UFU believes that these practical constraints reduce the attractiveness of cage trapping as a large-scale disease-control tool, particularly where alternative methods are available that can be deployed more rapidly and efficiently.

The UFU notes that DAERA's analysis identified cage trapping as one of the most expensive intervention options available. Public-sector cage trap options were found to have the highest costs overall, followed by private-sector cage trap options. This places a significant financial burden on any programme that relies heavily on cage trapping.

While the UFU recognises that effective disease control requires investment, it is essential that both finite public funds, and trusted private-sector funding, are directed towards measures that deliver the greatest return in terms of bTB reduction. Given the substantial costs associated with cage trapping, the Union has concerns regarding its value for money when compared with alternative intervention approaches. DAERA's monetary cost-benefit analysis demonstrated that a non-selective cull using cage traps deployed by the private sector ranked fourth highest overall, outperforming most Test, Vaccinate or Remove (TVR) and vaccination-only interventions. This demonstrates that non-selective culling remains one of the most effective categories of intervention available and reinforces the UFU's support for culling as a disease-control measure.

However, the fact that cage trapping did not rank among the highest-performing cull options suggests that alternative delivery methods may provide a more efficient means of achieving the same policy objective. The UFU therefore believes that support for non-selective culling should not automatically equate to support for cage trapping where other methods can achieve comparable outcomes at lower cost.

The UFU recognises that, within DAERA's assessment framework, non-selective culling using cage trapping performed strongly in several welfare-related categories. When assessing factors relating to trapping and time to death, non-selective culling using cage trapping achieved the highest score among the intervention options considered. Furthermore, when all badger, cattle and human welfare considerations were assessed collectively, a non-selective cull using cage traps ranked as the second-best overall intervention option.

The UFU acknowledges these positive welfare outcomes and accepts that cage trapping may offer advantages in this regard. However, welfare performance must be balanced against practical implementation and affordability. An intervention that performs well on welfare grounds but is significantly more expensive and resource-intensive may not represent the most appropriate choice for widespread deployment.

The UFU strongly supports the implementation of a non-selective badger cull as part of Northern Ireland's strategy to eradicate bovine tuberculosis. However, the Union does not support the use of baited cage trapping alongside a badger cull as the preferred capture method.

While cage trapping performs well in several welfare assessments and remains superior to many vaccination-only and TVR options in DAERA's cost-benefit analysis, it is also associated with significant operational challenges, extended deployment periods and substantially higher costs. The requirement for baiting, trap preparation, transportation and installation further reduces its practicality for large-scale disease-control operations.

The UFU therefore believes that DAERA should prioritise more cost-effective and operationally efficient methods for delivering a non-selective badger cull, while ensuring that appropriate animal welfare standards are maintained. Any decision to utilise cage trapping should be justified against its significantly higher costs and carefully assessed in the context of available public-sector funding and the overall objective of delivering the greatest possible reduction in bTB.

6.3 Non-Selective Cull using Stopped Restraints

Considering all the relevant factors outlined would you support a non-selective cull of badgers using stopped restraints as a potential Wildlife Intervention approach?

Yes. The Ulster Farmers Union strongly supports a non-selective cull of badgers using stopped restraints as a potential Wildlife Intervention approach. The UFU considers that stopped restraints offer a practical, cost-effective and operationally efficient method of badger capture, while also providing important flexibility in the delivery of any disease control programme.

The UFU wishes to make clear that its support for the use of stopped restraints is specifically in the context of a non-selective badger cull for bovine tuberculosis control purposes. The Union does not support the use of stopped restraints for alternative wildlife intervention methods, including vaccination-only programmes, research activities, or other forms of badger management. The primary justification for the use of stopped restraints is their ability to facilitate the efficient, practical and cost-effective delivery of a disease control cull aimed at reducing the wildlife reservoir of bovine tuberculosis. In the absence of a non-selective badger cull, the UFU does not consider there to be sufficient justification for the deployment of stopped restraints.

Stopped restraints have been used extensively in the Republic of Ireland for both badger research and operational deployment. This provides a substantial body of practical experience on which DAERA can draw when developing policy and operational protocols.

The UFU believes DAERA should work closely with the Department of Agriculture, Food and the Marine (DAFM) in the Republic of Ireland to benefit from existing expertise, operational knowledge and best practice regarding the deployment, monitoring and welfare management of stopped restraints.

Compared with cage traps, stopped restraints offer a number of practical advantages:

- They are lightweight and easy to transport across challenging terrain.
- They can be deployed quickly and efficiently.
- No baiting or bait-training period is required.
- They can be used from the first night of deployment, increasing operational efficiency and reducing labour requirements.
- They are particularly suited to areas where access is difficult or where cage trap deployment may be less practical.

The UFU notes that private-sector restraint trap options are estimated to cost significantly less than both public-sector and private-sector cage trapping alternatives.

DAERA's own economic assessments indicate that a non-selective cull using restraint traps deployed by the private sector ranked second only to predominant controlled

shooting in the Department's monetary cost-benefit analysis. Furthermore, the use of restraints rather than cages generally improves the ranking of intervention options under both cost and sensitivity analyses. Given the considerable financial burden that bTB places on both farm businesses and the public purse, it is essential that DAERA adopts intervention methods that deliver the greatest disease control benefit at the lowest practical cost. The availability of stopped restraints would help ensure that any intervention programme can be delivered as efficiently and cost-effectively as possible.

The UFU recognises that DAERA's assessment ranked stopped restraints slightly lower than cage trapping from a badger welfare perspective due to a higher proportion of non-minor injuries observed in captured animals. However, welfare assessments must consider the full capture process rather than focusing solely on the capture device itself.

Unlike cage trapping, stopped restraints do not require prolonged periods of baiting or bait training prior to deployment. Consequently, badgers are less likely to experience multiple periods of capture attempt, restraint or confinement over several days before successful capture. This may reduce the overall duration of stress associated with the capture process. The UFU therefore considers that, when operated under appropriate protocols, training standards and inspection requirements, stopped restraints can provide an effective and proportionate capture method while maintaining acceptable animal welfare standards.

A significant advantage of stopped restraints is the potential to facilitate a longer annual intervention period. In the Republic of Ireland, stopped restraints may be deployed from 1 April through to 31 January, meaning that only two months of the year are closed to operations. Stopped restraints are designed to capture badgers above a specified size threshold, allowing younger animals additional time to mature before becoming susceptible to capture. This helps address concerns regarding very young animals while providing greater flexibility in programme delivery. This also allows more badgers to be captured and tested, increasing the likelihood of positive badgers being identified and the likelihood of infected badgers being removed.

The UFU welcomes DAERA's indication that a longer open season could be considered in Northern Ireland where stopped restraints are used. Such flexibility would:

- Allow disease control measures to be undertaken over a longer period.
- Improve operational planning and resource allocation.
- Increase opportunities to achieve intervention targets.
- Reduce pressure to complete work within a confined seasonal window.
- Improve the overall effectiveness of any badger population management programme.

The UFU strongly supports the use of stopped restraints alongside a non-selective badger cull as part of an integrated bTB eradication strategy in Northern Ireland.

Stopped restraints are a proven tool with a long history of use in the Republic of Ireland and offer significant advantages in terms of practicality, cost, deployment efficiency and operational flexibility. While acknowledging the importance of maintaining high welfare standards, the UFU believes that appropriately regulated and monitored stopped restraint deployment represents a proportionate and effective method of badger capture in support of a non-selective culling programme.

The UFU wishes to emphasise that its support for stopped restraints is confined to their use within a non-selective badger cull. The Union does not support their use for alternative wildlife intervention methods and considers their value to lie in enabling an effective, affordable and deliverable disease control programme.

The UFU therefore urges DAERA to include stopped restraints as a permitted capture method within any future non-selective badger cull programme and to work closely with DAFM to ensure that established best practice and operational experience are incorporated into their implementation in Northern Ireland.

7. Test and Vaccinate or Remove (TVR)

7.1 TVR using Baited Cages

Considering all the relevant factors outlined would you support a Test and Vaccinate or Remove using baited cages as a trapping method as a potential Wildlife Intervention approach?

No – The UFU strongly opposes any option including a test, vaccine or remove approach. While recognising the importance of addressing the wildlife component of bovine tuberculosis (bTB) eradication, there are significant concerns regarding the suitability of a Test, Vaccinate and Remove (TVR) approach as the primary badger intervention strategy in Northern Ireland. In particular, concerns relate to the inability of available tests to identify all infected badgers, the substantial cost and logistical burden of implementation, and the limited evidence that TVR delivers meaningful reductions in cattle TB at herd level.

A fundamental weakness of the TVR approach is that it relies on diagnostic testing to determine which badgers are removed and which are vaccinated and released. However, the tests currently available for use in live badgers are not 100% sensitive and therefore cannot identify every infected animal. The principal test used in the Northern Ireland TVR project, and being suggested as the most likely test for any future intervention, is the Dual Path Platform (DPP) blood test. DAERA's analysis of the original County Down TVR project reported a sensitivity of approximately 69%, meaning that around 31% of infected badgers could potentially remain undetected and be released back into the population. Specificity was reported as 98%.

Consequently, under a TVR system:

- Infected badgers may be vaccinated and released because they test negative.
- Those animals may continue to infect other badgers.
- Residual infection may persist within badger social groups.
- Continued infection in wildlife could reduce the effectiveness of the intervention and limit any benefit to cattle TB control.

The possibility of leaving infected animals in the population is particularly problematic when TVR is presented as a disease-control measure, as its success is highly dependent on the accuracy of the diagnostic test.

Alongside the issues with the test, many wildlife vaccines do not provide complete sterilizing immunity. Instead, they reduce disease severity, bacterial shedding, or the likelihood of infection. While this can be beneficial, vaccinated animals may still become infected and contribute to transmission. Studies of BCG vaccination in badgers showed

reductions in disease severity and progression, but not complete prevention of infection in every animal.

The cost of TVR is also significantly higher than any non-selective cull approach. DAERA itself has acknowledged that wildlife intervention programmes incur substantial costs and that TVR is a complex operation requiring specialist staff and equipment. Within the 'options analysis' document, DAERA states that TVR is the most expensive approach - £183k - £228k more than a non-selective cull and £149k - £151k more than vaccination only approaches.

The process involves:

- Repeated annual trapping of badgers.
- Veterinary supervision and sedation.
- Blood sampling and diagnostic testing.
- Vaccination of test-negative animals.
- Removal of test-positive animals.
- Microchipping, record keeping and monitoring.
- Follow-up trapping over multiple years.

Evidence from the previous Northern Ireland TVR project demonstrates the scale of resources required. Over five years, 824 badgers were trapped, resulting in 1,520 capture events and more than 1,400 vaccinations being administered. Researchers concluded that the project provided important information regarding the substantial logistics and resources required to undertake a TVR programme.

The financial implications become even clearer in the recently announced cross-border TVR pilot, where the Northern Ireland element alone is expected to cost approximately £10.75 million over the course of 5 years. Whilst this does account for additional control measures alongside TVR, including cattle and people measures, TVR will use a significant amount of this funding. Given current budgetary constraints, such expenditure would need to be justified by clear evidence of disease reduction benefits. At present, that evidence remains uncertain.

A significant issue also lies within the broader landscape of Northern Ireland. Northern Ireland has a highly fragmented agricultural landscape with high cattle densities, extensive landowner involvement and close interactions between farms.

Successful TVR requires:

- High trapping coverage.
- Consistent annual recapture rates.
- Access to large numbers of farms and landholdings.
- Long-term commitment of staff and resources.

Any reduction in trapping coverage or inability to access land could allow infected animals to remain untreated, further reducing effectiveness. Given the intensive resource requirements demonstrated during the original TVR study, scaling such a programme across larger parts of Northern Ireland would present significant practical challenges.

While TVR has contributed useful scientific information regarding badger TB epidemiology, the evidence indicates several significant limitations that make it a questionable option for large-scale implementation in Northern Ireland.

First, the diagnostic tests used in TVR do not detect all infected badgers, meaning a substantial proportion of infected animals may be vaccinated and released rather than removed.

Second, the approach is complex and expensive, requiring repeated trapping, veterinary input, testing and vaccination over multiple years. The current cross-border TVR pilot is expected to cost more than £10 million in Northern Ireland alone.

Third, peer-reviewed analyses of the Northern Ireland TVR project suggest that cattle-to-cattle transmission remained the dominant driver of disease and that the impact of wildlife intervention on cattle TB levels was uncertain.

For these reasons, the evidence suggests that a TVR approach may not represent the most effective or cost-efficient use of resources for TB eradication in Northern Ireland, particularly when weighed against measures aimed directly at reducing disease transmission within the cattle population.

7.2 TVR using Stopped Restraints

Considering all the relevant factors outlined would you support a Test and Vaccinate or Remove using stopped restraints as a trapping method as a potential Wildlife Intervention approach?

The UFU's position is clear and consistent: the UFU does not support the use of Test, Vaccinate or Remove (TVR) as a badger intervention strategy, irrespective of the capture method employed. Whether badgers are captured using stopped restraints or baited cage traps, the fundamental concerns around TVR remain unchanged. The key issue for the UFU is not the mechanism used to capture badgers, but the principle of TVR itself. As such, any discussion about the relative merits of stopped restraints versus baited cages is secondary to the UFU's overarching position that TVR should not form part of the badger intervention approach. Therefore, the UFU's opposition applies equally to all forms of TVR implementation and should not be interpreted as support for TVR under one capture method but not another. The Union's stance is that TVR is not an appropriate intervention, regardless of whether stopped restraints or baited cage traps are used to facilitate the programme.

8. Vaccination Only Options

8.1 Vaccination Only using Baited Cages

Considering all the relevant factors outlined would you support Vaccination Only using baited cages as a trapping method as a potential Wildlife Intervention approach?

No – The UFU is strongly opposed to any wildlife intervention method which does not utilise a lethal component, regardless of the trapping method involved. The available evidence indicates that a vaccination-only approach would not represent the most effective intervention for Northern Ireland. The findings from DAERA's assessment and the Chief Veterinary Officer (CVO) review demonstrate that vaccination alone would deliver significantly slower and more limited disease reduction compared with approaches that include a wildlife population reduction component.

A key consideration is the relative speed and scale of disease control. Analysis of the scientific evidence concludes that interventions incorporating a lethal component provide a faster reduction in cattle herd bTB breakdowns than vaccination-only approaches. Vaccination does not cure infected badgers and only helps protect uninfected animals from developing disease in the future. As a result, vaccination alone cannot rapidly reduce the existing infection pressure within the badger population.

The evidence suggests that vaccination would be substantially less effective unless it were preceded by a reduction in infection prevalence through culling or another removal-based intervention. In areas where infection is already well established, relying solely on vaccination would therefore delay progress towards reducing transmission between wildlife and cattle.

DAERA's evaluation found that all vaccination-only options ranked very low across strategic, economic, non-monetary and risk assessment criteria. This indicates that vaccination alone does not deliver the same level of benefits as other intervention options when assessed against the Department's objectives for disease reduction, value for money, environmental outcomes and overall programme risk. These findings reflect the practical reality that vaccination requires sustained long-term effort, repeated capture of badgers, and very high coverage levels before meaningful epidemiological benefits are achieved.

One of the most important measures of intervention success is the number of cattle herd breakdowns prevented and the associated reduction in cattle slaughter. Using the assumption that seven cattle are removed on average for every unique herd breakdown, the modelling estimated that over the first four years of intervention:

- Non-selective culling approaches would prevent approximately 133 premature cattle deaths.
- Test, Vaccinate or Remove (TVR) approaches would prevent approximately 119 premature cattle deaths.
- Vaccination-only approaches would prevent only 14 premature cattle deaths.

This means that the cull and TVR options are projected to prevent almost ten times more cattle deaths than vaccination-only approaches during the critical initial intervention period. Such a large difference demonstrates that vaccination alone would make only a modest contribution to reducing the immediate burden of disease on farmers and the livestock sector.

The CVO review highlights the risks associated with relying solely on non-lethal interventions. It states that if a decision is taken not to cull, and those non-lethal measures prove less effective, then progress towards eliminating bTB will inevitably be slower. The review further warns that complete disease elimination may become difficult to achieve under such circumstances. Given Northern Ireland's longstanding challenges with bTB, it is essential that interventions deliver measurable reductions in disease incidence within a realistic timeframe. A strategy that delays progress risks prolonging the economic, animal welfare and social impacts of the disease for farmers and rural communities.

The environmental assessment also favours options that achieve a greater reduction in herd breakdowns. Because greenhouse gas emissions are associated with maintaining infected herds and the premature removal and replacement of cattle, interventions that prevent more breakdowns also deliver greater climate benefits. Non-selective culling and TVR approaches score highest in this regard because they achieve the largest reductions in disease incidence. Vaccination-only approaches score lowest due to their comparatively limited impact on cattle breakdowns and associated livestock losses.

The evidence reviewed by DAERA suggests that vaccination has greater value as part of a phased disease-control programme rather than as a standalone intervention. The CVO review notes that vaccination-only approaches would require many years of implementation and consistently high vaccination coverage to achieve outcomes comparable to strategies that include a removal component.

The available evidence indicates that a badger vaccination-only approach would not provide the most effective means of addressing bTB in Northern Ireland. Compared with options that include a lethal component, vaccination delivers slower disease reduction, prevents substantially fewer cattle losses, scores poorly across DAERA's strategic and economic assessments, provides fewer environmental benefits, and may make eradication more difficult to achieve. While vaccination may have an important role within a comprehensive bTB strategy, the evidence suggests it is best deployed as part of

a wider programme and particularly as an exit strategy following measures that reduce infection pressure more rapidly.

The UFU strongly opposes the consideration of vaccination only during this period of consultation and urges DAERA to understand the significance of finding a quick, cost-effective firebreak to the ongoing disease burden faced by Northern Ireland farmers.

8.2 Vaccination Only using Stopped Restraints

Considering all the relevant factors outlined would you support Vaccination Only using stopped restraints as a trapping method as a potential Wildlife Intervention approach?

As with TVR, the UFU's position is strong on Vaccination Only methodologies: the UFU does not support the use of Vaccination Only as a badger intervention strategy, irrespective of the capture method employed. Whether badgers are captured using stopped restraints or baited cage traps, the fundamental concerns around Vaccination Only also remain unchanged.

Central to the UFU's position is the continued lack of confidence that badger vaccination alone can deliver the level of disease control required to meaningfully reduce the prevalence and transmission of bovine TB. While vaccination may have a role as part of a wider disease management programme, there remains insufficient evidence to demonstrate that a Vaccination Only strategy can effectively address infection within established badger populations or significantly reduce the risk of transmission between wildlife and cattle in high-incidence areas.

The UFU is particularly concerned that vaccination does not treat badgers already infected with bovine TB and therefore may have limited impact on existing disease reservoirs. Furthermore, the practical challenges associated with delivering and maintaining sufficiently high vaccination coverage across badger populations, year after year, create uncertainty over the effectiveness of such an approach in achieving meaningful disease reduction.

For these reasons, the Union believes that relying solely on vaccination represents a high-risk strategy that lacks the scientific certainty and proven outcomes necessary to justify its adoption as a standalone intervention. The capture method used does not alter these concerns. Consequently, the UFU's opposition is not based on how badgers are caught, but rather on its lack of confidence that Vaccination Only approaches can deliver the robust and measurable reductions in bovine TB prevalence that farmers require. As a result, the UFU does not support Vaccination Only methodologies as an effective badger intervention strategy.

9. Delivery and Funding approaches for Wildlife Intervention

9.1 Private Sector Delivery of Wildlife Intervention

Do you agree that any wildlife intervention option selected should be delivered by the private sector, with the Department's role limited to oversight, regulation and monitoring?

Yes, the UFU agrees that any wildlife intervention should be delivered by the private sector, with the Department's role limited to oversight, regulation and monitoring. However, the UFU feels that if the delivery of the programme is being undertaken by the private sector, then the private sector needs to have some control over what oversight, regulation and monitoring is taking place by DAERA and DAERA should not be allowed to carry out this responsibility without direct supervision by the private sector.

The UFU believes that a system similar to what is in place in England should be considered as a benchmark for the delivery of any selected wildlife intervention option. The England badger control programme demonstrates how a farmer-led wildlife intervention can deliver disease control benefits while giving farmers a direct role in implementation. Farmers and landowners formed local cull companies, pooled resources, and funded the operational delivery of culling across licensed areas. This ensured that those most affected by bovine TB had influence over how the programme was managed and delivered. The programme provided farmers with a structured mechanism to help address a recognised wildlife reservoir of bovine TB, complementing cattle-based disease controls. DEFRA provided the policy framework, licensing, monitoring and oversight, while trained and accredited operators carried out culling in accordance with strict welfare and operational standards.

A key benefit of the English model was that it combined government regulation with industry leadership, reducing reliance on direct public funding for operational delivery. By placing responsibility for implementation with local farmer and landowner groups, the programme encouraged local ownership, increased stakeholder engagement and demonstrated that wildlife intervention measures can be effectively delivered through farmer-led organisations.

The UFU also considers it important that the significant preparatory work undertaken in Northern Ireland during 2022 and 2023 is not lost. Following DAERA's decision to progress a badger intervention programme, considerable effort was invested in developing delivery structures, engaging farmer-led organisations, establishing operational frameworks and preparing for the training and accreditation of operators. An expression of interest process was launched to identify suitable organisations capable of delivering wildlife intervention measures under a regulated system.

As DAERA considers future wildlife intervention options in 2026, the UFU believes that this previous work should be built upon rather than restarted from the beginning. The foundations for a private sector-led delivery model have already been established, and lessons learned from both Northern Ireland's preparatory work and the English experience should be used to develop an effective, proportionate and practical intervention programme capable of contributing to the reduction of bovine TB.

9.2 Private Sector Funding of Wildlife Intervention

Do you agree that any wildlife intervention option selected should be funded by the private sector, with the Department funding oversight, regulation and monitoring?

Yes, the UFU agrees that any wildlife intervention should be funded by the private sector, with the Department funding oversight, regulation and monitoring. The UFU agrees that it would support the reasonable costs which were outlined in the private sector delivery options, but whoever is involved in private sector delivery must have some oversight of the costs. The private sector needs to have some control over what oversight, regulation and monitoring is taking place by DAERA and DAERA should not be allowed to carry out this responsibility without direct supervision by the private sector.

If the industry and the wider private sector are to fund any wildlife intervention option, then confidence and trust in the department needs to be regained. Funding of a wildlife intervention approach needs to be aligned with what farmers want, and what is best for the industry, and to do this, farmers need to know that they will be listened to.

The UFU wishes to remind DAERA that the industry has previously been, and still are, committed to contributing to effective, lethal wildlife intervention to reduce bTB levels in Northern Ireland. Between 2023 and 2024, the dairy and beef sectors in Northern Ireland voluntarily contributed to a Wildlife Intervention Levy through industry representative bodies as part of preparations for the proposed future wildlife intervention programme which was approved at the time and later stopped due to an unfortunate judicial review.

The purpose of the levy was to:

- Demonstrate industry commitment to tackling bovine TB through both cattle and wildlife measures.
- Create a dedicated fund to support the development and potential delivery of wildlife intervention options.
- Provide seed funding for preparatory work associated with a proposed badger intervention programme.
- Ensure that farmers, as primary beneficiaries of any reduction in bovine TB levels, made a direct contribution towards the costs of wildlife controls.

The levy was collected from producers in the dairy and beef sectors and represented a significant commitment by industry to share responsibility for addressing the bovine TB challenge. The fund was intended to complement the wider objectives set out in the Bovine Tuberculosis Eradication Strategy for Northern Ireland, which emphasised partnership between government and industry in the fight against TB. The levy collected 0.02 pence per litre of milk from dairy producers, and £1 from any slaughtered beef cattle, which, if farmers were asked today, is still a significant contribution from their finances.

All funds collected from this levy were ring-fenced and are still available today, with the caveat that they are only to be used by the industry for wildlife intervention.

From a policy perspective, this Wildlife Intervention Levy demonstrates that Northern Ireland farmers are prepared to invest directly in wildlife measures, reflecting the principle that wildlife intervention should be a shared responsibility between industry and government. It also provides evidence of industry support for a private sector-led approach to wildlife intervention, similar to the model subsequently considered by DAERA and used in England.

10. Lay Vaccination

Do you agree that the Veterinary Surgery (Vaccination of Badgers Against Tuberculosis) Order 2010 should be extended to NI allowing for the lay vaccination of badgers in NI, under licence to support bTB control?

No, the UFU does not support extending the Veterinary Surgery (Vaccination of Badgers Against Tuberculosis) Order 2010 to Northern Ireland to allow for the lay vaccination of badgers, as the UFU does not support any wildlife intervention method which includes the vaccination of badgers. The available evidence indicates that vaccination is less effective at reducing bTB prevalence and cattle herd breakdowns than approaches which include a wildlife population reduction component.

In addition, the UFU believes that any wildlife intervention programme should be delivered to the highest possible standards and under robust veterinary oversight. The vaccination of badgers is a specialised activity involving the capture, handling and treatment of wild animals, with associated animal welfare, health and safety, biosecurity and data collection considerations. Expanding the activity beyond suitably qualified veterinary professionals risks creating inconsistencies in delivery and monitoring while offering limited benefit where the underlying intervention itself is not supported.

While vaccination may have a role as part of a wider disease eradication programme, particularly following measures that reduce infection prevalence more rapidly, the UFU does not believe that extending lay vaccination powers would address the fundamental limitations associated with vaccination-only approaches. Consequently, the UFU does not support the introduction of lay vaccination of badgers in Northern Ireland for bTB control purposes.

11. Ethics and Disability Duties

Are there any comments on equality and disability issues you wish to raise?

The UFU is content that DAERA has given appropriate consideration to equality and disability issues within the consultation and has fulfilled its obligations in assessing the potential impact of the proposed wildlife intervention options across all relevant groups.

12. Bovine Tuberculosis in Northern Ireland; Blueprint for Eradication

Are you content that the Blueprint strategy contains all necessary actions to address bTB in NI?

The UFU agrees that the blueprint strategy does identify many of the key issues and actions required to tackle bTB and that collaboration with wider industry was carried out thoroughly to develop the blueprint strategy. However, concerns have been raised within the UFU and by the UFU to DAERA on multiple occasions regarding DAERA's ability to implement and progress the necessary measures in a timely or appropriate manner. There is a distinction between publishing a strategy that contains the necessary actions, and actually carrying out the actions within the strategy which will make a difference to disease control in Northern Ireland, and it would be difficult to defend that actions within the Blueprint strategy have been carried out to the benefit of NI farming, at present.

13. Conclusion

The Ulster Farmers' Union recognises that bovine tuberculosis remains one of the most significant animal health challenges facing Northern Ireland and continues to place a significant financial, operational and emotional burden on farming families. While the UFU agrees that the Blueprint for Eradication identifies many of the key actions required to tackle bTB, meaningful progress will depend on the timely and effective implementation of those measures rather than the publication of strategy alone.

The evidence presented throughout this consultation, together with the additional scientific evidence highlighted by the UFU, reinforces the view that wildlife intervention must form a central component of any credible and comprehensive bTB eradication programme. After more than 60 years of increasingly stringent cattle controls, Northern Ireland continues to experience unacceptably high levels of disease, demonstrating that tackling infection within cattle alone will not deliver eradication.

The UFU strongly supports wildlife intervention approaches that are practical, cost-effective, deliverable and capable of reducing the wildlife reservoir of infection. In particular, the Union supports private sector-led non-selective culling options, including controlled shooting and the use of stopped restraints, as these approaches perform strongly in terms of disease control potential, affordability, operational feasibility and overall value for money. The UFU supports these approaches on the basis that they are private sector led and funded.

Conversely, the UFU does not support any approach involving the vaccination of badgers including; vaccination only, lay vaccination and Test and Vaccinate or Remove models. The Union's concerns relate to the limited effectiveness of vaccination as a standalone measure, the inaccuracy of the current diagnostic tests, the substantial costs associated with TVR programmes and the lack of evidence that such approaches deliver disease reduction at the scale and pace required in Northern Ireland. In the UFU's view, these interventions represent a less effective and less efficient use of resources than non-selective culling approaches.

The UFU further believes that future policy decisions should take account of emerging scientific evidence relating to badger population density, distribution, disease transmission pathways, biodiversity impacts and novel diagnostic technologies. Such evidence has the potential to improve both disease control outcomes and the overall effectiveness of wildlife intervention programmes.

Ultimately, the UFU's objective is not the management of badgers for its own sake, but the eradication of bTB. Our farmers want healthy cattle, healthy wildlife and a sustainable future for agriculture. Achieving that objective will require decisive, evidence-based action that addresses all significant sources of infection, balances animal welfare with disease control outcomes, and delivers measures that are practical, affordable and

capable of achieving meaningful reductions in bTB prevalence. The UFU therefore urges DAERA to implement a comprehensive eradication programme that includes effective wildlife intervention as a key component of Northern Ireland's long-term bTB strategy.

14. Bibliography

Birch, C. P. D., Bakrania, M., Prosser, A., Brown, D., Withenshaw, S. M., & Downs, S. H.

(2024). Difference in differences analysis evaluates the effects of the badger control policy on bovine tuberculosis in England. *Scientific Reports*, 14(1).

<https://doi.org/10.1038/s41598-024-54062-4>

Dane, H., Gilbride, B., Thomas, M., & Grant, I. R. (2025). Evidence of

mycobacteriaemias and mycobacterial co-infections uncovered in cattle at slaughter using a novel phage-based PhMS-qPCR assay for viable mycobacterium bovis and mycobacterium avium subsp. Paratuberculosis. *Irish Veterinary Journal*, 79(1).

<https://doi.org/10.1186/s13620-025-00323-1>

Drewe, J. A., O'Connor, H. M., Weber, N., McDonald, R. A., & Delahay, R. J. (2013).

Patterns of direct and indirect contact between cattle and badgers naturally infected with tuberculosis. *Epidemiology and Infection*, 141(7), 1467–1475.

<https://doi.org/10.1017/S0950268813000691>

Haverty, M., & King, R. (2026). Review of the indirect costs borne by farmers, as a result of bovine TB (bTB): Final report. In *Prepared for Dairy Council for Northern Ireland, Ulster Farmers' Union and Livestock & Meat Commission*. The Andersons Centre.

King, H. C., Murphy, A., James, P., Travis, E., Porter, D., Hung, Y.-J., Sawyer, J., Cork, J., Delahay, R. J., Gaze, W., Courtenay, O., & Wellington, E. M. (2015). The variability and seasonality of the environmental reservoir of mycobacterium bovis shed by wild European badgers. *Scientific Reports*, 5(1). <https://doi.org/10.1038/srep12318>

Mills, C. L., Woodroffe, R., & Donnelly, C. A. (2024). An extensive re-evaluation of evidence and analyses of the randomised badger culling trial II: In neighbouring areas.

R. Soc. Open Sci., 11(8), 240386. <https://doi.org/10.1098/rsos.240386>

Mitchell-Jones , A. J. (2020). *Badger impacts on biodiversity and agriculture in Scotland: a literature review*. NatureScot Research Report No. 1205. .