

Ms Sue Hayman MP
Shadow Environment Secretary
House of Commons
London
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September 2019

The Labour Party's 50-point Animal Welfare Manifesto A response by the Veterinary Association for Wildlife Management

Dear Ms Hayman

The Veterinary Association for Wildlife Management (VAWM) welcomes any serious proposal to improve the welfare of animals provided that such measures have a sound scientific basis, are workable and the consequences are fully thought through.

VAWM has 570 supporters who are general veterinary practitioners, spread across England, Wales, Scotland and Ireland. The objectives of the Association are to promote the sensible management of British wildlife by methods that are advantageous for the welfare of wild animals and which promote or sustain the health and vigour of their species.

Within the 50-point plan there are areas that are beyond VAWM's remit, but nevertheless would obviously improve the welfare of domestic animals, such as the steps to be taken to end the illicit trade in dogs through puppy farming, and these are to be welcomed.

However, other points below addressing wild animal welfare, are a cause for concern:

Sentencing

- Remove two-tier sentencing for animal cruelty so that all animals, whether domestic, under human control or wild, are protected by the same five-year maximum sentence for animal cruelty.

While no one would argue that it is justifiable to deliberately cause wild animals unnecessary suffering (the legal definition of cruelty), it must be recognised that wild animals live in a different state to that of domestic animals. What may well be an everyday experience for a wild animal could well be terrifying for a domestic animal. Examples of these differences and further scientific evidence can be found in the booklet *Life in the Wild* which highlights the fundamental differences in the way in which wild and domestic animals live and the differing approaches to their management and welfare.

(http://www.vetwildlifemanagement.org.uk/media/pdf/LifeinWild8ppA5b_with_notes_03xi11.pdf)

In the wild there are pressures on wild animals, such as disease and population control that do not apply to domestic animals. In an environment that is called 'wild', yet is almost exclusively man-managed, there is a responsibility on man to ensure a proper balance is kept. "*Life in the Wild*" describes the detrimental consequences of 'leaving things to nature' and explains why certain actions that are unnecessary and possibly devastating to a domestic animal are essential and natural for wild animals.

<http://www.vet-wildlifemanagement.org.uk/index.php/en/>

- *“Numerous misconceptions surround the state in which wild animals live. On one hand there is an imagined woodland utopia, in which everything in nature lives in harmony. An opposite scenario is one in which animals are living in a state of constant anxiety, fleeing in dread from predators, including man. Neither description accurately portrays the reality of life in the wild.*
- *Alertness or fear in wild animals, the ability to anticipate, understand and learn to avoid danger once experienced (associative learning) are crucial to their survival.”*
- *“There is an evident difference between wild and domestic animals when considering biodiversity and conservation. Sustainable and healthy wildlife populations will not result from a “hands-off” approach.*
- *There is a need to manage and/or control the populations of certain species by various means to address over-population, to ensure healthy populations, to control disease, to protect habitat and to limit damage to crops and livestock.”*

Furthermore, as wild animals are not under human control (unless taken into captivity), issues such as treatment for disease will obviously take on a different form. In addition, management of populations, conservation and protection of farmers’ crops and livestock are issues that simply do not apply in the case of domestic animals. This is why laws against cruelty in the UK have always made a clear distinction between domestic and wild animals.

Obviously, there is no real difference between the torturing of a captive wild animal to that of torturing a domestic animal and both should be condemned as wanton cruelty, but in addressing the need for wildlife management, it must be recognised that activities totally divorced from the care and husbandry of domestic animals will be employed. These different methods may well cause confusion for those unfamiliar with these crucial dissimilarities and possibly lead to the unnecessary involvement of the police and legal system.

It is for these reasons that VAWM advises caution with regard to the wording of any proposed legislation that blurs the line between wild animals and domesticated animals.

Hunting with dogs

- Enhance and strengthen the Hunting Act, closing loopholes that allow for illegal hunting of foxes, deer and hares. This would include:
 - Review penalties under the Hunting Act 2004 to ensure it is an effective deterrent, including consulting on the introduction of custodial sentences, bringing it in line with the penalties for other wildlife crimes.
 - Introduce a new ‘recklessness’ clause to prevent trail hunts being used as cover for the illegal hunting of wild mammals.
 - Remove the exemption for ‘research and observation’.
 - Remove the exemption ‘use of dogs below ground to protect birds for shooting’.

VAWM regards the use of dogs in wildlife management, and in particular the use of hunting with scenting hounds, as a humane and natural means of control when undertaken under the rules laid down by the various ruling hunting bodies.

We submit that hunting by hounds is the natural and most humane method of controlling the population of all four quarry species in the countryside (fox, deer, hare and mink). Natural because the animal is hunted in the environment that it knows and natural also because it

doesn't use any alien technology (guns or traps) for which the wild animal has no natural defence or coping mechanism. Humane because there is no wounding with hunting - the animal is either killed almost instantaneously or it escapes unscathed. The relatively short period of physiological stress that may be suffered in the final phase of the hunt is well within the capacity of a wild animal; humane also because it is selective and culls the weak, the aged, the sick and the wounded in direct relation to their debility. Hunting is the only method of culling that selectively maintains the health and vigour of the species and which allows the quarry species respite during the breeding season.

Pursuit or The Natural Chase (Colvile 2007) followed by the almost instantaneous kill must in animal welfare terms be the preferred method of culling. It is environmentally friendly to other wildlife and is the natural, balanced, biological method of controlling wildlife. It is a vital and essential tool in wildlife management which should be returned to the countryside

There is no validated science that concludes that the use of the dog is inherently cruel. It is the view of VAWM that scenting hounds have a unique characteristic that replicates the evolutionary or natural way of pursuit undertaken by wolves and other predators for millennia.

It follows that VAWM is not supportive of the Hunting Act. Furthermore, while accepting that this is now law, it is without any research or study into how this legislation has affected wildlife, VAWM opposes therefore any move to fiddle with this hugely unsatisfactory law or to remove some of the exemptions. (It should be remembered that these exemptions were agreed to and included in the legislation by those opposed to hunting).

VAWM therefore recommends that the Hunting Act be replaced with a new wild mammal protection bill of the type introduced in the past by Lord Donoughue that properly addresses the whole issue of wildlife management and welfare.

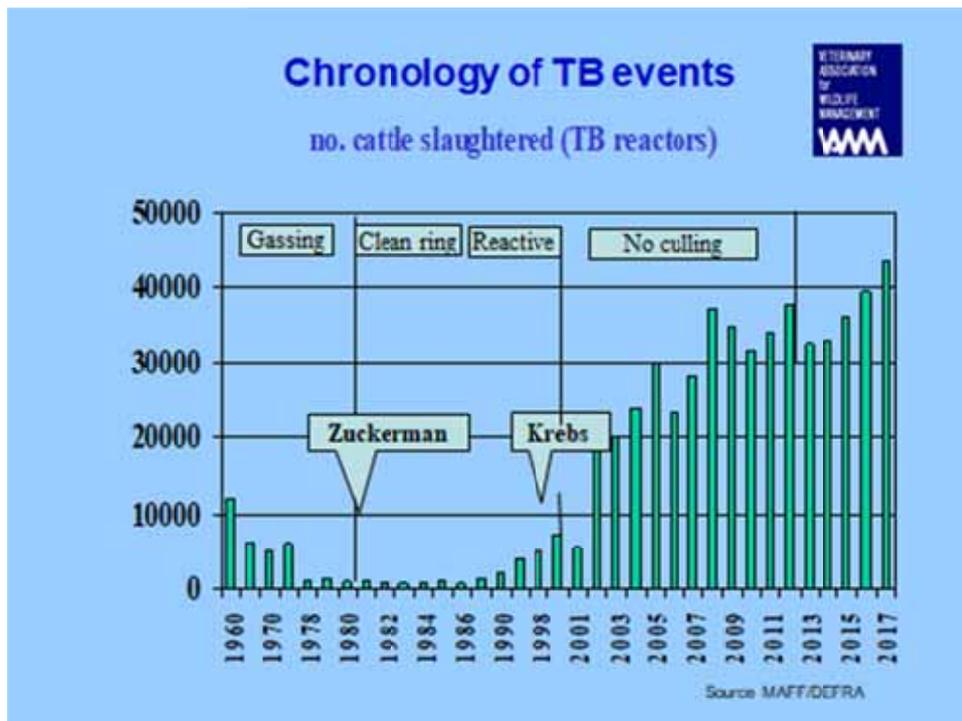
Badger Culling

- End the badger cull. We would work instead on non-lethal interventions to reduce the incidence of disease in cattle.

The problem with badgers and bovine TB is two fold:

1. Since the badger was made a protected species in 1973 the population has been expanding out of control.
2. A large proportion of badgers, up to 30% in some areas in the SW, Wales and W.Midlands, are endemically infected with bovine TB with some excreting vast numbers of infectious tubercle bacilli into the agricultural environment.

This combination has led to a steep rise in the incidence of TB reactors in cattle, up 18-20% year on year since 1986 (see chart below) and spreading in parallel with the expanding badger population.



Badgers are the de facto reservoir of the disease, many of which, in the terminal stages, are excreting vast numbers of tubercle bacilli into the environment. Cattle, which are detected in the early stage of infection by the TB tuberculin test and slaughtered as reactors, do not as a result shed the organism. They are simply the sentinels of the disease in badgers. Under these circumstances the disease does not spread horizontally in cattle.

Unless and until the countrywide burden of infection in badgers is tackled the appalling level of infection in cattle shown above will persist. And badgers will continue to suffer the ravages of this insidious disease.

There is no alternative to culling, which when carried out properly and efficiently, has been shown to be entirely effective in controlling the disease.

The unproven, Badger BCG vaccine, which only has a Limited Marketing Authorisation, does not and will not have any beneficial effect on the disease in badgers. The 4 year, Badger Vaccine Deployment Project carried out by the APHA in Gloucestershire (2015) and other studies confirm this opinion.

Non-lethal interventions do not tackle the root of the problem namely the highly infectious badger and will not therefore reduce the incidence of disease in cattle. Nor do they address the collateral damage from badger overpopulation that is loss of vulnerable wildlife such as hedgehogs and ground nesting birds and damage to property and land such as grave yards, gardens and golf courses.

The badger, a large mammal with no natural predator, is a classic example of a population out of control through lack of management.

In our response to the Godfray Review (2018) we urge the Government to properly address the problem of bovine TB and resume research into identifying humane fumigants coupled with identification of infected badger setts by molecular PCR testing so that a more efficient, humane and targeted strategy of culling badgers underground might be pursued. Such an approach that targeted only infected/diseased animals would clearly be more acceptable to the public in general and to the profession.

To end the cull, relying on what is assumed to be vaccination, and without stating a clear, proven strategy, is highly irresponsible and furthermore not supported by the results emanating from those areas that have culled badgers over the past few years.

Snares

- Ban the sale and use of snares and glue traps.

VAWM would be happy to see the end of glue traps, which are used to capture small pest animals such as rats and mice, studies have shown that in trying to escape some animals have suffered unnecessarily.

Snares, on the other hand, are used for predator control, as well as for scientific purposes when wild animals are to be caught and tagged, and should be used only to hold an animal by way of a stop on the noose.

When used properly, VAWM agrees with the continued use of the stoppered snare as do other scientific bodies such as the Game and Wildlife Conservation Trust.

Grouse shooting

VAWM would welcome a genuinely independent review of driven grouse shooting

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