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CONVENTION ON THE CONSERVATION OF EUROPEAN
WILDLIFE AND NATURAL HABITATS

Standing Committee

46th meeting,
7-11 December 2026,
Strasbourg

Bureau of the Standing Committee

17-18 June 2026,
Strasbourg

Complaint on stand-by: 2019/04

Badger Culling Policy in England (United Kingdom)

- REPORT BY THE COMPLAINANT -

*Document prepared by
The Born Free Foundation UK, The Badger Trust UK, and Eurogroup For Animals, Brussels*

COMPLAINANTS' UPDATED REPORT
APRIL 2026

1. Since 2013, the UK government has permitted the killing of more than 250,000 ¹ European badgers (*Meles meles*) under licence, as part of its strategy to control the spread of bovine tuberculosis (bTB) in cattle.
2. After more than a decade of intensive culling, bTB remains endemic in cattle herds across large parts of England, and scientific evidence increasingly undermines the efficacy of badger culling as a means of reducing bovine TB transmission to cattle.^{2,3,4} Indeed, the government has itself acknowledged the ineffectiveness of the cull,⁵ consistent with advice it received from Natural England prior to approving the policy.⁶
3. The UK has failed to provide robust population estimates to demonstrate that culling does not endanger local badger populations. Instead, population data is largely derived from cull companies themselves. Anecdotal reports from local wildlife groups indicate that badgers have disappeared entirely from some long-established territories within cull areas.
4. International ethical principles for wildlife control⁷ make clear that lethal control must be a last resort, used only in exceptional circumstances, and when it is deemed necessary it should be carried out in a way that causes the least animal welfare harms to the least number of animals. Badger culling fails these principles: it is indiscriminate, lacks transparency, causes significant suffering, and has relied heavily on a method deemed inhumane by the Government's own Independent Expert Panel⁸ and rejected by the British Veterinary Association, among other expert bodies.

¹ According to data published by the UK government's Department of Environment, Food and Rural Affairs, as of the end of 2024, 247,275 badgers had been killed under license since 2013. Figures for the numbers of badgers killed in 2025 under supplementary and intensive licences have not yet been released.

² Langton, T.E.S., Jones, M.W. and McGill, I. (2022) Analysis of the impact of badger culling on bovine tuberculosis in cattle in the high-risk area of England, 2009–2020. *Vet Rec*;e1384.

<https://doi.org/10.1002/vetr.1384>

³ Torgerson, P.R. et al. (2025). Randomised Badger Culling Trial—no effects of widespread badger culling on tuberculosis in cattle: comment on Mills, Woodroffe and Donnelly (2024a, 2024b). *R Soc Open Sci*; 12 (6): 241609. <https://doi.org/10.1098/rsos.241609>

⁴ Torgerson, P.R. (2025) Evidence against culling healthy badgers. *Veterinary Record*, 197: 294-295. <https://doi.org/10.1002/vetr.6058>

⁵ In June 2024, the incoming Labour Government committed in their manifesto "*to end[ing] the ineffective badger cull*" (<https://labour.org.uk/change/make-britain-a-clean-energy-superpower/>).

⁶ Natural England's "general position on badgers and bovine TB", p9 of their advice of Dec 2010: "*Past control strategies based on culling badgers proved ineffective at controlling the incidence of the disease in cattle.*"

⁷ <https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/cobi.12896>

⁸ <https://www.gov.uk/government/publications/pilot-badger-culls-in-somerset-and-gloucestershire-report-by-the-independent-expert-panel>

5. The European badger is an Annex III species under the Bern Convention and is therefore afforded the protection specified in Articles 7 and 8. Article 9 sets out circumstances where exceptions to these provisions may be made, provided certain conditions are met.
6. In 2019, Born Free Foundation, the Badger Trust, and Eurogroup for Animals submitted a formal complaint relating to the UK government's badger culling policy, citing breaches of Articles 7, 8 and 9. Additional information in support of the complaint was provided by the complainants in March 2020, July 2020, July 2021, July 2022, July 2023, July 2024, and January 2025. The complaint remains a stand-by file.
7. At its second ordinary meeting of 2025 on 18-19 June⁹, the Bureau of the Standing Committee to the Bern Convention re-examined the complaint and expressed concerns about the explanation and elaboration provided by the UK government. In particular, the Bureau noted the following:
 - *The respondent reiterated that all badger culling licences would end in January 2026, yet the Respondent's email of 10 June 2025 indicated that the UK intends to end the cull later in this Parliament - which will end in 2029. This update indicates a less defined end date. The Bureau requests that the respondent addresses this recent statement and clarifies the timeframe for the end of badger culling licences.*
 - *The Respondent has indicated that a continuation of badger culling is required to maintain disease control and preserve gains before the effective rollout of badger vaccination. The maintenance of the cull is also justified by the Respondent by reference to limitations in capacity, cost and time to scale up vaccination. The Bureau is concerned that financial reasons are used to justify a derogation from the Convention and requests more detail and explanation on these feasibility issues in the next progress report.*
 - *It is noted that the Respondent has communicated developing a bTB strategy that will consider the vaccination of cattle and badgers, with the aim of bTB eradication by 2038. The Bureau is concerned that the maintenance of badger culling is not only inconsistent with the stated policy of the current UK Government, but also of published scientific opinion, whereby in the circumstances of the England, badger culling has had no meaningful contribution to the control of bTB in cattle. Furthermore, the advice from Natural England's Director of Science indicates that further supplementary culling in existing cull zones is not necessary from a disease control perspective.*
 - *It is observed that satisfactory vaccination solutions have existed for some period of time, as acknowledged in UK government policy, which indicates also that culling is the preference of stakeholders. As also indicated by the complainant in their response, a solution is not unsatisfactory on the basis of inconvenience or due to a required change in the behaviour of those who benefit of the derogation.*
8. The Bureau called for the Respondent to move with greater urgency and progress on the ending of the badger culling policy as there are clear satisfactory alternatives available, principally vaccination. It expressed concern and would consider the elevation of the case-file status in the absence of *very positive news for the Summer 2026 Meeting*.

⁹ <https://rm.coe.int/tpvs06e-2025-report-2nd-bureau-meeting-18-19-june-2025-2760-9898-7790-/1680b6c1a3>

9. In spite of the Bureau's concerns, in June 2025 supplementary badger culling licences were issued by Natural England for 9 zones in England that had previously completed four years of intensive culling. These licences were issued against the advice of Natural England's own Director of Science for the second year in succession.¹⁰
10. In September 2025, further intensive badger culling licences were issued by Natural England, permitting the killing of badgers across 11 zones for a fourth consecutive year.
11. Details of the number of badgers killed under licence during 2025 have not yet been released.
12. In a debate on 13th October 2025, the UK Minister for Food Security and Rural Affairs stated that *"The 2025 season is nearly over, and this is the final year of industry-led culling in England's high-risk and edge areas."*¹¹ This development is welcomed by the complainants.
13. However, culling in a zone in the low-risk area of England, designated 'Cumbria 73', continues. According to the Minister, *"[culling in this zone] will continue until the end of the season and then there will be an analysis to see how effective it has been scientifically. A decision will then be made about whether to continue with that final licence."*
14. In August 2024, the UK government announced the launch of work on a comprehensive new TB eradication strategy. As of the time of writing, the new strategy had not yet been published. However, despite the Bureau's request at its meeting in April 2025¹² that the UK government should include the complainants in this process to accommodate and address their concerns so they are able to be informed and participate appropriately in bTB strategy development, direct engagement with the complainants by government has been, at best, extremely limited throughout the strategy review process. The complainants were not invited to participate in either the steering group discussions, or the 'Badgers and other Wildlife' Working Group established by the UK government to provide input into the development of the new strategy.
15. It is widely anticipated that the new TB eradication strategy will contain a strong focus on the value and roll-out of badger vaccination. The effectiveness of badger vaccination in reducing disease severity within badger populations is already established.¹³ Indeed, the government's original 2011 policy authorising the cull openly acknowledged the existence and effectiveness of this "other satisfactory solution".¹⁴ However, further research seeking to link badger vaccination to reductions in cattle bTB risks reinforcing an unhelpful wildlife-focused narrative and does not address the primary transmission route within and between cattle herds. Badger vaccination must never be presented as an adjunct to, or justification for, continued culling.

¹⁰ Annex 1

¹¹ <https://hansard.parliament.uk/Commons/2025-10-13/debates/29C3A9F2-021F-4675-BDA1-F7710613DB9A/BovineTuberculosisControlAndBadgerCulling?highlight=westminster%20hall%20debates#contribution-9E583AD9-B403-458C-BA78-0903D933F158>

¹² <https://rm.coe.int/tpvs04e-2025-report-1st-bureau-meeting-8-10-april-2025-2782-0569-6781-/1680b5d441>

¹³ CARTER, S. P. et al. (2012) BCG vaccination reduces risk of tuberculosis infection in vaccinated badgers and unvaccinated badger cubs. PLOS One 7, e49833-e49833

¹⁴ <https://assets.publishing.service.gov.uk/media/5a789a86ed915d07d35b0fb8/pb13691-bovinetb-policy-statement.pdf> (para 3.1: *"The aim of any badger control policy would be to reduce confirmed cattle herd breakdowns. The control options currently available to us to reduce the transmission of bovine TB from badgers to cattle are biosecurity measures, vaccinating badgers, and/or culling badgers"*; paras 3.6-3.7: *"Laboratory studies have demonstrated that vaccinating badgers by injection with BCG significantly reduces the progression, severity and excretion of TB infection... Defra has recently developed an injectable badger TB vaccine (BadgerBCG), which was licensed in March 2010 and has since been available for use on prescription..."*).

16. It is clear that:

- a. the UK Government's indication that badger culling in the low-risk area zone may continue, pending an assessment of its effectiveness, contradicts its previous assurance to the Bureau in September 2023 that "*The UK Government's current badger culling policy continues to be phased out ...*";
- b. the continuation of licenced culling in the low-risk area zone, and its possible extension to other zones in the low-risk area of England, is arbitrary and unnecessary taking into account the government's own admission that the policy is "*ineffective*" and that another satisfactory solution (vaccination) exists.
- c. any continuation and extension of the badger cull policy is in breach of its international law obligations under Articles 7 and 8 of the Bern Convention, as well as under the 'precautionary principle'. It is undeniable that the existence and continuation of a policy aimed at killing "*at least 70%*" of the badger population in a culled area is "*capable of causing local disappearance*" and/or "*capable of causing...serious disturbance*" to populations of badgers.

17. For the above reasons, the Complainants respectfully requests the Bureau:

- a. To reiterate that the UK's continued culling of badgers is incompatible with its obligations under the Convention, as previously determined by the Bureau;
- b. to invite the relevant decision-makers in the UK Government to engage in immediate and effective dialogue with the Complainants, prior to the finalisation and publication of its new bovine TB control policy;
- c. to urge the UK Government to observe the precautionary principle by agreeing an immediate and permanent end to the badger culling policy in all circumstances;
- d. to request that the UK provide independently verified, scientifically robust badger population data to demonstrate that local populations are not being endangered;
- e. to re-open the case and elevate it to the status of a 'possible file'.

18. The UK's anticipated position on badger culling and vaccination represents a serious and ongoing breach of its obligations under the Bern Convention. The continuation—and potential expansion—of lethal control measures in the low-risk area, despite clear scientific evidence and repeated findings by the Bureau, threatens the conservation status of a protected species and undermines the integrity of the Convention.

Respectfully submitted on behalf of Born Free Foundation, Badger Trust, and Eurogroup for Animals.

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