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Sir Geoffrey Clifton-Brown MP
Chair, Public Accounts Committee
House of Commons
Palace of Westminster
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From David Hill
Permanent Secretary

Resilience to threats from animal disease: Oral Evidence 4 September 2025

Dear Sir Geoffrey,

Thank you for the opportunity to appear before the Committee on 4 September. There were a number of points on which we offered to provide further information, which I address in turn below.

The Committee asked for a report on Exercise Pegasus [Q5]. Minister Dalton and Baroness Merron published written statements on 16 September in both Houses, for the Department for Health and Social Care (DHSC) outlining the stages of Exercise Pegasus. DHSC is the department responsible for the delivery of the exercise alongside the Cabinet Office. The written statements indicated three core days of exercising from 18 September (today) to 30 October, and a fourth phase (recovery) is also planned for 2026. The Ministers confirmed they are committed to communicating the findings and lessons of the Exercise as recommended by the Covid-19 Inquiry and a post-Exercise report will be delivered in due course, which we share as soon as it is available.

You requested information about the milestones for the redevelopment at Weybridge [Q34]. I enclose at Annex A the programme's strategic plan with the key deliverable dates and milestones. At present the programme is progressing well with the clearance of the site for construction, including the development of interim modern lab facilities that will enable APHA to continue to deliver science in fit for purpose facilities, while the new National Biosecurity Centre is built. The interim facilities will be launched in 2027 and 2028. Site infrastructure, including power and water infrastructure is being upgraded, which will improve the site's overall resilience. Site clearance and design should be concluded to allow the construction of the main Science Hubs in 2027; these are very large and complex construction projects, with

complex engineering, so the main build phase continues to 2032, following which there is a period of commissioning through to 2034.

The Committee asked for further information on seals on lorries between Dover and Sevington [Q55], including the application of seals on lorries arriving at Dover, so that when they arrive at Sevington it would be clear if any had been tampered with. Our assessment is that it would not be practicable to require this as there isn't the space at Dover Port to apply the seals to all the vehicles needed to attend the BCP, and this would further delay trade movements. Many commercial vehicles or containers are already commercially sealed by the exporter, and these seals can be checked by the Port Health Authority at Sevington for evidence of tampering. These seals are added by the exporter / haulier at the point of dispatch with the specific intent to evidence unauthorised entry to the consignment.

Legally, only a very few consignments (for example germinal products) have to be officially sealed at the point of dispatch by the certifying authority in the country of export. Operationally requiring all consignments entering via the Short Straits to be officially sealed at the point of dispatch would be a significant change for EU exporters and would act as a barrier to trade.

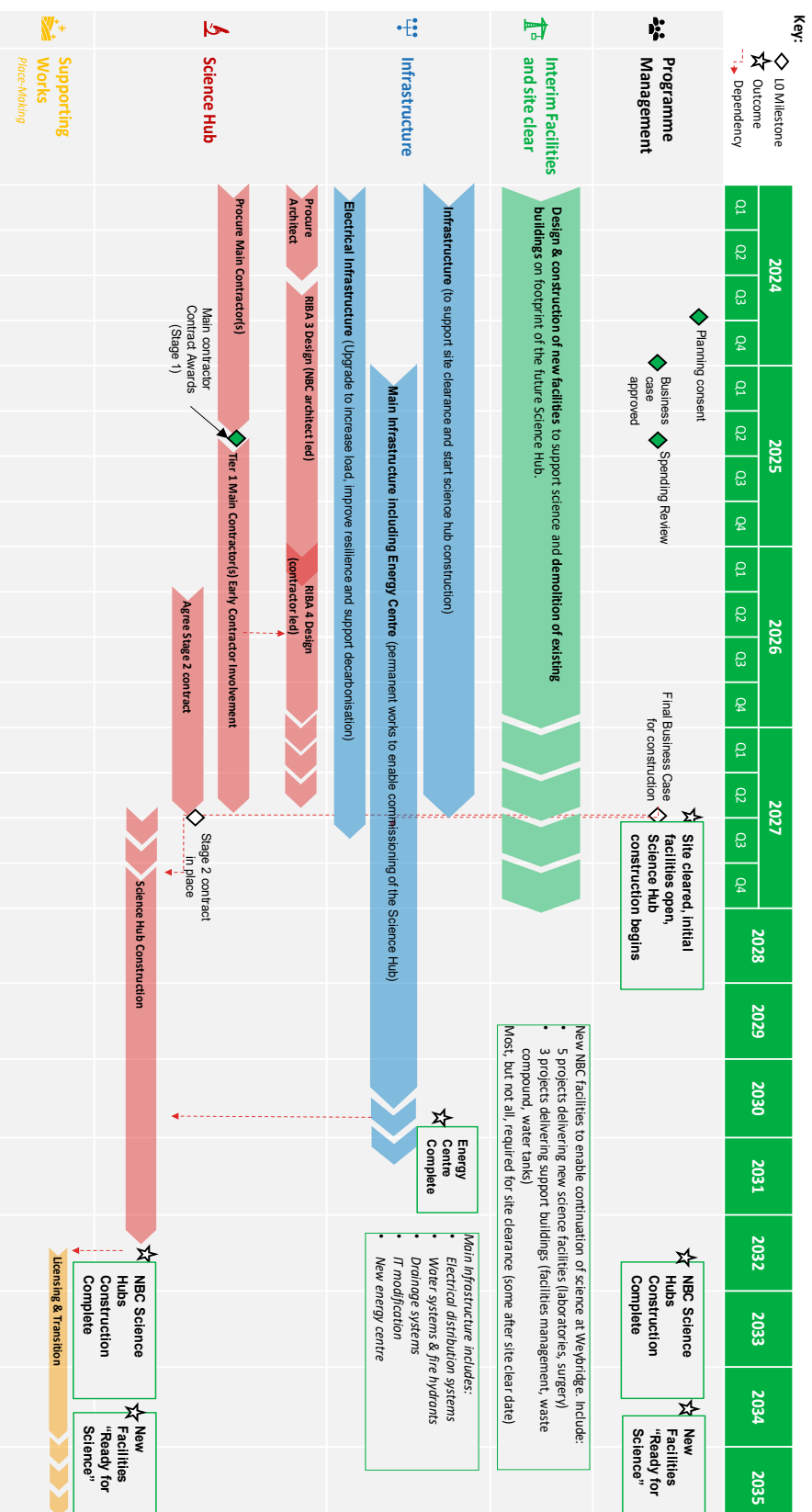
The Committee requested an update on bovine TB [Q62], focusing on cattle and badger vaccines, as well as the current disease situation in Gloucestershire. This information is provided at Annex B. Given the deployment of badger culling in the county, we have also included a brief on culling activity, along with the latest statistics, to provide a comprehensive overview.

Finally, I wish to provide clarification on two points raised during the PAC session. Firstly, it was mentioned that nearly 12,000 professionals could be accessed through the Veterinary Delivery Partner (VDP) contract. This figure refers to the total number of Official Veterinarians (OVs) authorised by APHA. However, only those engaged through VDP are contractually available to APHA. These contracts guarantee access to 100 OVs for up to six weeks, reducing to 50 OVs thereafter unless routine work is scaled down. In the event of a significant outbreak, VDP suppliers are expected to release the equivalent number of full-time OVs previously assigned to routine tasks. Secondly, Dr Lewis referred to 450 full-time equivalents working within APHA. To clarify, APHA has a target of approximately 470 veterinary posts across the agency, with a current vacancy rate of around 15% (9% excluding jobs under offer).



DAVID HILL
Permanent Secretary

Annex A: Weybridge Milestones



Annex B:

Bovine TB Introduction

- Following the Committee meeting on 4 September 2025 regarding resilience to animal disease threats, the Committee Chair, Sir Geoffrey Clifton-Brown, requested an update on bovine TB, in particular on cattle and badger vaccination, as well as the current bovine TB situation in Gloucestershire. Given the deployment of badger culling in the county, we have also included a brief on culling activity to provide a comprehensive overview.

Bovine TB strategy refresh

- Work is underway to refresh the Bovine TB Strategy for England, which was originally introduced in 2014. A co-design steering group, drawn from the existing Bovine TB Partnership for England, is leading the development of the new strategy. This work is being supported by several expert working groups comprising farmers, vets, scientists, and conservationists.
- A key part of the strategy is to drive forward the ongoing development of a cattle vaccine, which is at the forefront of innovative solutions to help eradicate this disease. See below.
- The new strategy is expected to be ready to publicly present by Spring 2026.

Reconvening 'Godfray Review' panel

- To ensure the new strategy is informed by the latest evidence and scientific understanding, Professor Sir Charles Godfray, an eminent population biologist from the Oxford Martin School, University of Oxford, was asked to reconvene a panel of experts to independently review new evidence published since their previous report in 2018.
- The panel's latest report was published in September 2025: <https://www.gov.uk/government/publications/bovine-tuberculosis-godfray-evidence-review-update-2025>. Each working group is now actively considering the panel's findings and using its insights to shape their recommendations.

Cattle vaccine development

- The development of a cattle vaccine against bovine TB is at the forefront of global innovative solutions to help eradicate this disease. The Cattle BCG vaccine, when coupled with the new Detect Infected amongst Vaccinated Animals (DIVA) skin test, represents a significant advancement in bovine TB control for cattle herds. By vaccinating cattle against bovine TB, we have the potential to not only protect individual animals from infection but also create a barrier to transmission within herds and across populations.
- The DIVA test will ensure that we can reliably identify bovine TB infected cattle whether vaccinated or not, something the currently tuberculin test is unable to provide. APHA has developed a DIVA format of the skin test (DST-F) based on three defined antigens that

induce an immune response in *M. bovis*-infected animals (and therefore a positive skin test result), but not in BCG vaccinates. This was developed as a companion test for use alongside CattleBCG. This development is a major breakthrough. If the DIVA skin test (DST-F) is successfully validated and approved for use it will remove the problem of BCG vaccine-related false positives with the current tuberculin test by reacting only in those animals that became infected with the bovine TB bacterium despite having received the vaccine, i.e. true-positives.

- The field trials began in June 2021 and are on-going. Phase 1 assessed the safety and specificity of the DST-F test on 524 uninfected and unvaccinated animals across the LRA and concluded in May 2022.
- Phase 2 was designed to assess the safety of the CattleBCG vaccine and the safety and specificity of the DST-f reagent in vaccinated cattle. Phase 2 began in January 2023 and included 657 cattle in the LRA, half of which were vaccinated and half were administered a control product.
- We have accelerated trial Phase 3 to take place on commercial cattle farms in England and Wales, due to complete in 2027. Phase 3 aims to generate additional data on the DST-F reagent specificity in a broader cohort of approximately 750 vaccinated animals in low bovine TB risk areas of England and Wales to optimise the planning of the future vaccine deployment strategy.
- The field trials will gather further evidence on the performance of the DIVA test and vaccine to support APHA's marketing authorisation applications to the Veterinary Medicines Directorate (VMD) and achieve international recognition.
- Previous studies demonstrated significant vaccine protection against experimental challenge with high dose of bovine TB. As with other vaccines, a range of protection is expected, some animals will be fully or only partially protected after vaccination whilst others will remain susceptible to the disease. Recent international studies investigating the full extent of BCG protection in natural conditions found a total efficacy of 89%.
- We have worked in broad partnership across stakeholders, including the farmers that are participating in the trials, the industry members that have volunteered their time in considering potential deployment strategies, the APHA scientists and government officials working to assess these new tools.
- We are continuing to work at pace but will only deploy the vaccine and companion DIVA skin test when we have all the right steps in place. Our aim is to deliver an effective cattle TB vaccination strategy within the next few years to accelerate progress towards achieving OTF status for England by 2038. Bovine TB vaccination has the potential to help drive down the disease burden for future generations.
- Further information is available at: <https://tbhub.co.uk/resources/frequently-asked-questions/development-of-a-deployable-tuberculosis-vaccine-for-cattle/>.

- **Technical discussion paper on BCG vaccination of cattle** - [Submitted to WOA on 29 June 2021: https://tbhub.co.uk/wp-content/uploads/2022/12/APHA_technical_discussion_paper_WOAH_-_BCG_vaccination_cattle.pdf](https://tbhub.co.uk/wp-content/uploads/2022/12/APHA_technical_discussion_paper_WOAH_-_BCG_vaccination_cattle.pdf)

Badger culling

- The current badger cull policy is based on the Randomised Badger Control Trial, a large field study conducted between 1998 and 2005, which demonstrated that proactive culling led to a sustained reduction in bovine TB in cattle. Since 2013, Natural England has licensed farmer-led cull companies across most of the High-Risk Area and the worst-affected parts of the Edge Area of England, resulting in the culling of over 230,000 badgers to date.
- There are two types of cull licence:
 - Intensive culling takes place over a four-year period. Annual culls are carried out in the autumn, typically lasting six to eight weeks. The first intensive culls began in two pilot areas in 2013.
 - Supplementary culling occurs after the conclusion of intensive culling, aiming to maintain the reduction in the badger population achieved during the initial intensive cull. These culls are conducted over an extended period, typically from June to December. Licences were initially granted for up to five years but were later reduced to two years in some areas (see below). The first supplementary culls began in 2017.
- The latest review, led by Professor Sir Charles Godfray, concluded: *“that there is clear evidence that the package of intervention measures including culling has the effect of reducing bovine TB in cattle. It is not possible statistically to separate quantitatively the individual contributions of different components of the package and the possible interactions between them”*.
- Following a public consultation in 2021, the government at the time decided to phase out intensive and supplementary badger culling. This decision removed the provision for cull areas to reapply for supplementary cull licences. Licences of this type granted since 2021 were also limited to two years only, and intensive cull areas licensed in 2021 were not eligible to apply for supplementary cull licences.
- As a consequence, the 2025 season will mark the final year of culling in the High-Risk and Edge Areas of England. Beyond that, the only remaining culls will be in response to bovine TB hotspots in the Low-Risk Area (currently limited to a single licence in Cumbria), which is also expected to conclude before the end of this Parliament.

Badger vaccination

- Badger vaccination is proven to significantly reduce the risk of infection and spread of disease within badger populations. Research shows that badger vaccination reduces the risk of badgers testing positive for TB by up to 76%. Further, when more than a third of the social group was vaccinated, the risk of unvaccinated cubs testing positive was reduced by up to 79%. This suggests that it is not necessary to vaccinate every single badger in an area to have a beneficial effect on badger disease.
- We are continuing to deliver badger vaccination at scale across large, contiguous areas to help address a key evidence gap in England: the impact of badger vaccination on reducing TB incidence in cattle. However, evidence from the Republic of Ireland indicates that badger vaccination can be as effective as continued culling.
- The badger vaccination open season runs from 1 May to 30 November (inclusive). Badgers are captured in live-capture cage traps and injected with a BCG vaccine. This is typically a three-week process at each farm or trapping location, carried out annually over a four-year period. Although the overall process spans three weeks, traps are usually set to catch badgers for only two nights, with most of the time spent pre-baiting.
- By vaccinating annually in this way, the proportion of vaccinated badgers increases relative to infected individuals, which naturally die off (as badgers typically live for 3–5 years in the wild). Indeed, the Godfray Review panel concluded that: *“Important but limited field data supported by modelling shows this [cage trapping and vaccinating badgers] is a viable way of controlling bovine TB in wild badger populations, though some estimates suggest this may take more than a decade to achieve using current approaches”*.
- With the gradual winding down of badger culling since 2021, efforts have been focused on building badger vaccination capability. This has been supported through a range of initiatives, including a simplified regulatory system, featuring an online licence application and smartphone-based reporting, as well as funding for a project in East Sussex, where the local farming community has been delivering vaccination across an area of 250 km² (comparable to an average-sized cull area). Additionally, APHA field teams have been delivering vaccination in several large areas where culling has since ended – including over 100 km² in the region of the former cull area known as Area 1 in Gloucestershire. See below.
- As a result, 2024 was a record year for badger vaccination, with over 4,000 badgers vaccinated in England. Building on this momentum, a new project led by the NFU is now underway in Cornwall, aiming to explore scalable and cost-effective methods for delivering badger vaccination. As part of this project, the Zoological Society of London is collecting blood samples from captured badgers to monitor the effectiveness of vaccination in controlling bovine TB within badger populations. In addition, we are launching a new ‘badger vaccination field force’ next year, which will seek to replicate the East Sussex model and deliver vaccination in several epidemiologically defined areas where bovine TB incidence is high and worsening.

- The field force will be supplemented by the development of a new national wildlife surveillance programme, which is expected to begin next year and include the collection and TB testing of badgers found dead on roads in selected counties of England. As badger vaccination will be more targeted than culling, this data-driven approach is intended to ensure that vaccination is delivered in areas where it will have the greatest impact.

Badger control in Gloucestershire

- Four areas in Gloucestershire have carried out licensed badger culling, three of which have completed the full permitted cull duration and have now concluded culling activities:
 - Area 1 began intensive cull operations in 2013 as one of the two initial pilot areas. After completing four years of intensive culling, it carried out a further five years of supplementary culling, which concluded in 2021. Since then, between 75 and 92 km² of land has been signed up to APHA badger vaccination annually within this area, with vaccination ongoing in 2025. See below.
 - Area 9 began intensive culling in 2016, followed by five years of supplementary culling, which ended in 2024.
 - Area 29 began intensive culling in 2018, followed by two years of supplementary culling, which ended in 2023.
 - Area 46 began intensive culling in 2020 and is currently in its second and final year of supplementary culling.
- In Area 29, a sample of the carcasses removed during the first year of the cull underwent post-mortem examination by APHA, with 18.3% (24 out of 131) testing positive for *Mycobacterium bovis*. APHA repeated the sampling exercise in 2022, during its first year of supplementary culling. Of the carcasses sampled, 25 out of 173 (14.5%) were positive for *Mycobacterium bovis*. The apparent prevalence of TB in badgers in Area 29 has reduced by 2.9%, although this reduction is not statistically significant. Further information is available at: <https://www.gov.uk/government/publications/bovine-tb-surveillance-in-wildlife-in-england/september-2024-update-on-tb-surveillance-in-two-badger-control-areas#area-29--gloucestershire>.

Badger vaccination in Gloucestershire

- To date, since the BadgerBCG was licenced in 2010, APHA has administered 2,557 doses of the BadgerBCG vaccine to badgers in Gloucestershire. It is not possible to say definitively how many individual badgers this represents, as they are not permanently marked during vaccination operations, meaning some may have received more than one dose.
- So far in 2025, APHA has administered 292 doses of the Badger BCG vaccine to badgers in Gloucestershire, with a total of 229 km² of land accessible to APHA vaccinators, over 100 km² of which lies within the region of the former cull area known as Area 1. The

vaccination season is still underway, and further vaccination activity is planned in Gloucestershire later this year.

- The 2025 season marks the final year of four planned years of APHA-delivered badger vaccination in Gloucestershire. No decision has yet been made on whether APHA-led vaccination will continue beyond 2025. As noted above, the expansion of the badger vaccinator field force will increase vaccination capacity, with efforts targeted at areas experiencing high and rising levels of bovine TB.

Latest statistics

- The latest bovine TB stats have been released for Gloucestershire, looking at the time period from July 2024 to June 2025. All comparisons are to the previous 12 months.
- The herd incidence was 16.2, decreased from 18.7. There were 110 new breakdowns between July 2024 and June 2025, which represents a 17% decrease compared to the previous year. The percentage of herds which were not officially TB Free decreased from 10.7% to 9.7%.