

Natural England Consultation on General Licences

Please use this form to reply to the General Licence consultation. This document also includes a general feedback form.

Responses may be returned by email to: wildlifeconsultation@naturalengland.org.uk

We would prefer responses to be submitted electronically but if you prefer to respond in writing, please submit your response to: Natural England General Licences Consultation, c/o Dr Edel McGurk, Natural England, Government Buildings, Otley Road, Lawnswood, Leeds. LS16 5QT.

Organisation	British Ornithologists' Union
Respondee Name	Alistair Dawson
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The following table lists all of the questions posed in the consultation document. For each question, please indicate whether you support the proposal using the tick boxes, and provide an explanation and evidence in support of your view in the space provided. Where you do not have a view on a particular proposal, please tick 'No Comment'.

The form is designed to be completed on screen; free text boxes will expand as you type.

Confidentiality

We will respect requests for confidentiality. If you wish the information you provide to be treated as confidential, please record your request below; it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.

Responses to Proposals

THEME: Obligations to Protected Sites

Question 1: Do you agree with Natural England's proposal to address this concern by drawing attention to the existing obligations on Statutory Undertakers?

Yes No No Comment

THEME: Non-Native Species

Question 2: Do you agree with our proposal to use regulatory measures to facilitate the control or invasive non-native species?

Yes No No Comment

Question 3.1: Do you agree with our proposal to add Ring-necked and Monk Parakeets to the general licence issued for the purpose of conserving wild birds (s.16(1)(c) of the Wildlife and Countryside Act 1981)?

Yes No No Comment

Question 3.2: Do you agree with our proposal to add Canada Geese and Egyptian Geese to the general licence issued for the purpose of conserving wild birds (s.16(1)(c) of the Wildlife and Countryside Act 1981)?

Yes No No Comment

Question 4.1: Do you agree with our proposal to permit the killing/taking of Ring-necked and Monk Parakeet species for the purpose of preventing serious damage to crops, etc (s.16(1)(k) of the Wildlife and Countryside Act 1981)?

Yes No No Comment

Question 4.2: Do you agree with our proposal to issue a separate licence for this purpose for invasive non-native species?

Yes No No Comment

Question 5.1: Do you agree with our proposal to permit the killing/taking of Monk Parakeet species under a general licence for the purpose of preserving public health or public or air safety (s.16(1)(i) of the Wildlife and Countryside Act 1981)?

Yes No No Comment

Question 5.2: Do you agreed with our proposal to issue a separate licence for this purpose for invasive, non-native species?

Yes No No Comment

THEME – Review of species listed

Question 6.1: Do you agree that Great Black-backed Gull should only be listed on the general licence permitting take/kill birds for the purpose of preserving air safety? Please provide evidence in support of your view.

Yes No No Comment

In arguing for the change comparisons are made between this species' rarity and that of barn owl and kingfisher. This may be sound if England is taken in isolation but is unsound in the context of Britain as a whole. The number of breeding pairs of this gull in Britain is 13 times that in England whereas the breeding populations of barn owl and kingfisher in Britain are only twice that of England.

Moreover this gull is well known as a potentially important predator of some declining seabirds most notably the puffin in Dorset and on the Farnes.

To require responsible authorities to apply for individual licences is not justified. There is no evidence that the national status of this species is affected by necessary local control.

Question 6.2: Do you agree that the Herring Gull should only be listed on the general licences permitting

a. the killing/taking of birds for the purpose of preserving air safety?

Yes No No Comment

b. the destruction of eggs and nests for the purpose of preserving public health and public safety? Please provide evidence in support of your view.

Yes No No Comment

The argument that the status of this gull is similar to that of the house sparrow and [resident] starling is also unsound. The decline of the house sparrow and starling are unprecedented with causation still not settled. In contrast, the Herring Gull very strongly increased through the majority of the 20th Century, with causes of the increase and subsequent decline well understood. Whereas in the old terminology the starling and house sparrow are overall 'beneficial' the Herring Gull is not so.

To require responsible authorities to apply for individual licences is not justified. There is no evidence that the national status of this species is affected by necessary local control.

Question 7.1 Do you agree with our proposal to issue a limited general licence permitting the taking/killing of House sparrow, Starling, Robin and Blackbird in food production/handling premises for the purpose of preserving public health or public safety (s.16(1)(i) of the Wildlife and Countryside Act 1981)?

Yes No No Comment

Does this exclude other species? What about Collared Dove (and maybe other species) which regularly enter buildings (especially grain stores on farms, breweries etc)?

Question 7.2 If such a licence is issued, do you agree that it is appropriate to require users of the licence to register their first use of the licence with Natural England and to keep written records of action taken under the licence?

Yes No No Comment

THEME – Sales of birds

Question 8.1: Do you agree with the proposal to consolidate the sales licences?

Yes No No Comment

Question 8.2: Do you agree with the proposal to continue to allow the birds listed on the appendix (and their eggs) to be sold without a ring?

Yes No No Comment

BOU Records Committee have argued for a long time that all captive birds should be marked

Question 8.3: Is the list of species that are exempt from ringing correct (see draft licence for list)? If you disagree, please state why and provide evidence.

Yes No No Comment

BOU Records Committee have argued for a long time that all captive birds should be marked

Question 9.1: Do you agree with our proposal that no species be excluded from sale under the general licence on the grounds of risks to their conservation status from illegal take from the wild? If you disagree, please provide grounds and evidence for your position? If you do disagree, please provide grounds and evidence for your position.

Yes No No Comment

Question 9.2: Do you agree that Ruddy Duck and Egyptian Goose should continue to be excluded from the general licence permitting sales on the grounds of potential risks to native species, and that Canada Goose should be added to the list of exclusions?

Yes No No Comment

Question 9.3: Do you agree that sales of Eagle Owls under the general licence should be subject to a registration scheme on the grounds of potential risks to native species?

Yes No No Comment

Question 9.4: Do you believe that other bird species should be added to this list of exclusions on the grounds of potential risks to native species? Please consider the possible candidates suggested above; you may suggest other species and explain why, providing evidence.

Yes No No Comment

This is confusing. Barnacle Goose, Red-crested Pochard and Snow Goose are not 'non-natives'. They are all naturally occurring species in Britain with established breeding populations which have arisen from captive sources. So, only their breeding status here is as in a non-native context and I don't think that there is adequate clarity in the definitions and wording used.

Dudley, S.P. 2005. Changes to Category C of the British List. *Ibis* 147:803-820.

Also, Sacred Ibis - the UK threat is not from birds in captivity, but from likely arrivals of birds from the French Atlantic population (now over 1200 pairs and recorded c.100 miles away across the Channel). How is the occurrence of these birds covered? We need the ability to respond rapidly to such a threat (another species would be House Crow ship-hopping) and for such individuals we should adopt as close to a shoot on sight policy as possible in order to prevent the establishment of high risk species such as these.

Refs for Sacred Ibis, if needed, would be -

Yésou, P. & Clergeau, P. 2005. Sacred Ibis: a new invasive species in Europe. *Birding World* 18 (12): 517-526.

Question 10: Do you agree with our proposal that sales of dead Barnacle Goose and White-fronted Goose (Greenland race) be permitted under the general licence?

Yes No No Comment

Question 11.1: Do you agree that Natural England should provide guidance on what might constitute suitable documentary evidence?

Yes No No Comment

Question 11.2: Do you agree that the wording we propose is appropriate? If not, please provide alternative wording.

Yes No No Comment

THEME – Understanding and awareness of the general licences & their conditions

Question 12.1 Do you believe that there is sufficient widespread understanding of the General Licences, the circumstances in which they may be used and the conditions that apply. Please provide evidence in support of your answer where possible.

Yes No No Comment

Question 12.2 Do you have any suggestions as to how we could raise the level of awareness?

Please scroll down to the next part of this form if you wish to provide us with general feedback on this consultation package and exercise.