

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 Pest Control Association (BPCA)
Respondee Name	Oliver Madge
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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

This would be a prime opportunity to introduce certification for professional management to control these birds. Agree to add onto the general license, but for professionally qualified only.

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

These 'pests' are new to the industry and as such methods of management and control will need to be introduced. Now would be an ideal time to introduce (industry lead, delivered and managed) qualifications under license.

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

If numbers are so low then there may be limited 'pest' reasons, however restricting control for air safety may delay control treatments where required. Agree with removing general control, but should not prevent reasons for public health or safety. In addition permission only to those who can demonstrate a professional qualification.

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

A. Agree with removing general control, but should not prevent reasons for public health or safety. In addition permission only to those who can demonstrate a professional qualification. However the proofing, scaring and hygiene techniques that are available negate the need for killing Herring Gulls in the majority of circumstances.

B. Retaining permission to destroy eggs/nests is important as it does two things: allows proofing to be carried out at the times when the birds are causing a (health or safety) problem; and allows urban populations of gulls to exist and be managed without excessive increase in populations.

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

This is a very emotive subject with members of the public and media alike. Permission should only be provided if three factors can be satisfied:

1. Non-lethal methods have been considered and eliminated BEFORE any further action is carried out.
2. Risk Assessments and recommendations have been documented before any control measures are implemented.
3. Control is only carried out by those who are suitably qualified and competent in management (not just control)

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

Is the first use from the new legislation or for each site where they intend to control such birds?
What records would be required – risk assessment and elimination of all other control measures – could industry create the necessary documents to avoid any complications on going?

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

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

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

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

Documentary evidence is a very important area to avoid confusion and possible negligence. Working with the industry representative for that sector would reduce the cost and time for construction, availability and support such evidence templates and procedures may require.

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

In terms of taking/killing for public health and safety, this needs to be carried out by professionals in urban bird management. Individuals are generally trained in bird management by training providers such as BPCA and Network.

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

Training providers can be a good support system to provide the correct information, however there is no formal 'tutor' qualification in order to comprehensively deliver such information.

Tutors can cover the relevant legislation in detail or provide additional information to delegates on where the information can be found.

In addition, professionals who are unsure about any aspect of the legislation can, and often do, contact one of the above training organisations (or Natural England) to clarify it.

Trade Associations communicate to members on a frequent basis and would provide a good support network for passing on the correct information.

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.