

## 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](mailto: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.

<b>Organisation</b>	x
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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.

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## 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

Yes but as per views expressed below

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

Whilst I am unaware of any 'factual statistical' evidence that these species of parakeets are in direct competition with native species e.g. woodpeckers, nuthatch etc., for nesting sites, it is evident that such competition must be happening and by definition, must be detrimental to the native species.

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

These species are very successful breeders and can quickly colonise areas to the detriment of other species, in particular other indigenous waterfowl. (Isn't the Canada goose already included in the General Licence or is that only in regard to crop damage or H&S?)

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

Yes, but.... It would be dangerous to set a precedent of 'presumed damage to crops' without there being peer reviewed statistically significant evidence of such damage. It should not be difficult or expensive to demonstrate this one way or the other.

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

This could cause confusion as to which licence applies to the culling of some species. However, if a separate licence is decided upon, the implementation conditions of this 'separate licence' should be the same as the 'ordinary general licence' to avoid confusion

It might be simpler to have a single licence with clearly stipulated conditions for non native species.

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

In my opinion, where public H & S is an issue, there should be no argument regardless of the conservation status of any creature. If they pose a danger, cull them.

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

See 4.2 above

It might be simpler to have a single licence with stipulated conditions for non native species

### 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

There is evidence that this species can occasionally cause problems with respect to some ground nesting birds, and since you cite "we believe that only a small number are killed each year under the existing licences" is there really any necessity to remove it?

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

As with the Great Black Backed gull, there is limited evidence that this species can cause problems locally with respect to some ground nesting birds, and there are probably very few occasions when the general licence is invoked for their control. With an estimated winter

population size of 696-763 thousand (1993) is there really any necessity to remove it from the list for any of the reason? However, as an H&S issue it should be included if excluded for 'pest' reasons.

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

Where public health & safety e.g. food preparation is concerned, I suspect the Food Standards Agency would recommend removal of any such defecating bird at the earliest opportunity. To this end and in these circumstances I believe that your proposals at 1 & 2 below viz.

- 1) To use all appropriate legal, non-lethal options (including leaving doors open and turning lights off) for a defined period of time to resolve the problem
- 2) Only if these measures are unsuccessful, the licence may be used to permit the use of a suitable cage trap and/or mist net, again for a defined period. All birds caught by these methods are to be released alive and unharmed

are wholly inappropriate in such circumstances. How long do you allow a sparrow / robin to defecate over a food processor whilst you attempt to scare it through an open door or window or attempt to trap it? There are millions of bacteria in a single bird dropping. As you state that "in 2007/08, very small numbers of birds of these species (in the order of tens) were actually taken or killed under licence in these circumstances; such numbers do not cause concerns about a conservation impact" then it seems appropriate that offending birds are removed as quickly as possible by lethal means (shooting).

As bird species other than those already detailed under the existing general licence or those proposed at 7.1 above might also venture into food processing plants etc., why not have an "all species" inclusion in these specific circumstances? By the time a 'special licence' has been issued to allow the removal of a non specified species, a considerable cost in lost production and cleaning costs together with possible public exposure to unnecessary health risks are likely to have been incurred.

With regard to "The conditions of the licence would oblige those relying on it to employ suitably qualified/experienced persons to undertake the action (e.g. professional pest controllers, BTO authorised mist net users etc)" I think you need to word this more carefully.

There are very many experienced, suitably skilled individuals (myself included) who are not professionals but are capable of quickly, humanely and safely trapping / shooting birds even in the confined conditions found for example in a food processing plant. Many such (local) individuals can be contacted very quickly via shooting organisations (e.g. BASC) rather than having to wait possibly several hours (or days) before a suitable professional organisation could attend such an incident.

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

As these are otherwise protected species I feel it is wholly appropriate that an annual return of action taken under the licence is submitted to Natural England by any individual who invokes its use.

**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

I don't know, but there must be lots of other species held in captivity

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

I don't understand why either of these species should be specified to be sold dead if they are not for human consumption?

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

Yes  No  No Comment

Guidance as with advice, is always useful, but does not have to be followed.

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

You will note the ambiguity of the answer. With regard to the 'Licence to kill or take certain birds to prevent serious damage or disease (WML Gen-L05 or WLF18 )' which I guess is the most invoked of the General Licences, from my experience, most individuals have some understanding of the General Licence, though many do not fully appreciate the set of conditions of the licence before "lethal force" so to speak is applied.

The Sporting Press, and Sporting Organisations have over the last few years, devoted a number of column inches to the General Licence(s), their application and implementation, conditions etc.,

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

If NE has serious concerns that there is insufficient awareness of the conditions of use of the general licences, then further adverts / explanatory notes in the Sporting Press might help. However, there are many individuals who undertake pest control (under the terms of the General Licence) who would not be reached via this method. One sure way of disseminating such information however, is to include it with Shotgun and Firearm applications and renewals. However, I suspect that the various constabulary Firearms Departments would not be too keen to include further literature!

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.