

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	The Game & Wildlife Conservation Trust
Respondee Name	Stephen Tapper

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

We don't accept the argument about the relative scarcity of this bird. Brown & Grice (2005 *Birds in England*. Poyser.) show that breeding numbers have been roughly stable since 1970, and this is at least double the numbers there were in the 1950s.

General licences need to reflect the relative nuisance of the species and whether or not permitting open licences jeopardises the status of the bird. There is no evidence that culling is jeopardising the status of this gull.

Problems with this bird may be infrequent (as on some grouse moors) but that does not justify putting in place a more complicated licensing rigmarole with the inevitable delays this will cause.

When a problem is identified e.g. an individual gull specialising in chick predation, it needs to be dealt with immediately, otherwise it will be too late.

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

We think open general licences should continue to permit the control of this species for conserving wild birds (e.g. grouse). While we understand that the decline in the herring gull population is substantial and significant, we do not suspect this has been caused by culling, but is most likely due to the improved management of rubbish tips and less waste from fishing vessels.

We would also note that if one were to apply the same change-in-population logic to other nuisance species we would contend that the Raven should be added to the open general licence list. Its numbers have increased by 88% across the UK over the last 25 years, and by 163% in England since 1995.

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

But we think the control of both starling and house sparrow should also be permitted to protect crops. E.g. to protect seed-beds in gardens and allotments

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

Why on earth keep records of such things? One of the purposes of this exercise is to reduce "unnecessary burdens on those we regulate".

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

There is good evidence (Stuart 2007, British Birds 100, 481-486) that eagle owls were native in Britain after the last glaciations. There is in fact potentially a good case for their re-introduction on this basis.

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

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

Probably not. In most cases it doesn't matter provided the Secretary of State is convinced of the need for an open general licence.

We do however repeatedly remind gamekeepers and others about the licences and the conditions for their use in courses we run and when we write in sporting magazines.

There are some conditions however that have been stupidly worded and need to be changed. For example the requirement to check Larsen traps within a period of 24 hours means that a daily round will necessarily get earlier each succeeding day. Better to specify a longer period, say 30 hours, or just "daily".

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

You could persuade trap suppliers to provide a photocopy of some of the general licences when fulfilling orders.

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.