

## 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.

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| <b>Organisation</b>  | National Gamekeepers' Organisation                         |
| <b>Respondee Name</b>  | Charles Nodder   |
| <b>Contact Details</b><br><i>Address</i><br><i>Telephone</i><br><i>Email</i> | Political Adviser<br>PO Box 107, Bishop Auckland, DL14 9YW |

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

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| <b>THEME: Obligations to Protected Sites</b>   |
| Question 1: Do you agree with Natural England's proposal to address this concern by drawing attention to the existing obligations on Statutory Undertakers?<br>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No Comment <input type="checkbox"/>   |
| The suggestion would help.   |
| <b>THEME: Non-Native Species</b>   |
| Question 2: Do you agree with our proposal to use regulatory measures to facilitate the control or invasive non-native species?<br>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No Comment <input type="checkbox"/>   |
| Problems with non-native species are a priority and General Licensing should be used freely to permit their control and/or eradication.  |
| 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)?<br>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No Comment <input type="checkbox"/>                                      |
| Neither species is an issue for gamekeepers but as non-natives they should be controlled.  |
| 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)?<br>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No Comment <input type="checkbox"/>                                     |
| Both species can damage nesting habitat and compete for food with native species. It is right that they should be able to be controlled for the purpose of conserving wild birds as well as for crop protection etc.   |
| 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)?<br>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No Comment <input type="checkbox"/>                  |
| See above  |
| Question 4.2: Do you agree with our proposal to issue a separate licence for this purpose for invasive non-native species?<br>Yes <input type="checkbox"/> No <input type="checkbox"/> No Comment <input checked="" type="checkbox"/>  |
|  |
| 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)?<br>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No Comment <input type="checkbox"/> |

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

Gamekeepers control Great Black-backed Gulls to conserve vulnerable ground nesting species such as red grouse.

Great Black-backs are also sometimes culled where they are harrying and taking other game species from release pens or in the wild.

Greater Black-backs are strong predators of wildfowl and sometimes need to be controlled by wildfowling clubs conserving the birds on their marshes.

None of this control is countrywide, nor is it numerically extensive but in places where these birds are causing problems, gamekeepers and others need to be able to act immediately to control the problem birds and the general licences currently allow this to happen.

There is no evidence that such control is damaging to the Great Black-backed gull population overall.

Replacing control for these purposes under general licence with a need for individual licences would be vastly more bureaucratic, costly and – above all – too slow to be useful. Such a move would not be consistent with NE’s stated objective of proportionate regulation and “reducing any unnecessary burdens on those we regulate” (Consultation document, paragraph 11).

NE’s seventh proposal, that small numbers of house sparrows, robins and other species should be allowed to be controlled under general licence in food premises is a (sensible) move in the other direction to permit those who need to control these birds for food safety reasons to do so immediately.

It is wholly illogical to move one way on house sparrows and robbins and the other on the gull species. The gulls should all be left on the general licences as now. There is no good reason for them to come off and many reasons why individual licensing would not work.

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 same comments apply here as to Greater Black-backed Gulls (above). The National Gamekeepers Organisation feels very strongly that all the current gull species should remain on the general licences.

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 seems a sensible and proportionate response to a proven need.

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

Such a requirement would be bureaucratic, wasteful and is above all inconsistent with the basic premise of a general licence, which is to allow any appropriate person to act in accordance with some simple terms and conditions and not to get involved with bureaucracy relating to the individual in question. Keep it simple and only add more layers if it doesn't work.

### **THEME – Sales of birds**

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

Yes  No  No Comment

Any consolidation will help to make things simpler and, in the long run, better understood.

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 <input checked="" type="checkbox"/> No <input type="checkbox"/> No Comment <input type="checkbox"/>   |
| Escaped Eagle Owls have proved to be a real nuisance to wildlife in the recent past. Anything which makes inadvertent release of this large and powerful non-native species less likely is a good thing.  |
| 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.<br>Yes <input type="checkbox"/> No <input type="checkbox"/> No Comment <input checked="" type="checkbox"/>               |
|   |
| 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?<br>Yes <input type="checkbox"/> No <input type="checkbox"/> No Comment <input checked="" type="checkbox"/>   |
|   |
| Question 11.1: Do you agree that Natural England should provide guidance on what might constitute suitable documentary evidence?<br>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No Comment <input type="checkbox"/>   |
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| Question 11.2: Do you agree that the wording we propose is appropriate? If not, please provide alternative wording.<br>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No Comment <input type="checkbox"/>  |
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| <b>THEME – Understanding and awareness of the general licences &amp; their conditions</b>   |
| 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.<br>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No Comment <input type="checkbox"/>   |
| Most people have a low understanding of the general licensing system and its content because it is incredibly complicated, keeps changing and is different in each home country of the UK. Those who rely on the licences generally know more but we still take many calls from individuals uncertain whether they need a licence on paper or where to look the licences up or what, precisely, they say. |
| Question 12.2 Do you have any suggestions as to how we could raise the level of awareness?  |
| Work closely with the user groups and via organisations like ours, the pest control bodies, farmers' groups etc.  |

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.