From: wildlife
To: Wildlife Consultation (NE);
Subject: Consultation on WLCA
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West Sussex Wildlife Protection

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8th March 09

Natural England Consultation

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

This does not go far enough. The General Licence allows so much scope because "Health and Safety" or other reasons for justifying persecution can be so widely interpreted, you might as well not bother, as unless there is a requirement to apply for a licence, abuses will take place as they do already.

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

The use of General Licenses in this way is open to abuse. What is risk? Most of our established wildlife is invasive at one point in our history and here the rationale is that the WLCA 1981 provides protection to all birds not covered by the general licence. An individual should have to apply for a licence so that any abuse can be checked out and questions raised as to how will that person accomplish the difficult task of identification and selection in order to protect some widespread massacre that is detrimental to general wildlife. The risk asssment needs reviewing otherwise there will be only sport offered to people and no realistic hope of controlling no native birds.
There may be scope for non native flora controls on a more general licence basis as long as abuses can be avoided.

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

Ring necked and Monk Parakeets are already established and all you do is provide excuses for sport. It is impossible to control them and they provide a colourful and interesting addition to our wildlife that is very welcome in a world already changing because of global warming.

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

The crippling rate for shooting geese is over 50% and no geese should be on a general licence as humane considerations must play a prominet part in a general licence. "Robust approaches" really mean inhumane means of providing sport for people.

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 and disease (s.16 (1)(k) of the Wildlife and Countryside Act 1981)?

Once again this is open to abuse. The idea of disease spread is no more likely than any other species. Disease may have been a problem when they were captive but is not now the are free. Only a few fruit farms are likely to face a problem and they should apply for a specific licence. The dispersal argument is completely erroeous as they would only move a field away. Who thought this up?

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

As above, the dispersal argument is flawed.

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 safety (s.16(1)(i) of the Wildlife and Countryside Act 1981)?

In the unlikely even of a parakeet causing damage to a pylon a seperate licence should be sought. If Natural England starts to get lots of licences and they are genuine, review the matter then.

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

As above, dispersal is no argument, as there are not lots of people putting scarers on pylons or similar structures. Wait until this happens before considering this move.

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

This is agreed. Why provide supporting evidence. This is a rare bird!

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

1. **the killing/taking of birds for the purpose of preserving air safety, and**
2. **the destruction of eggs and nests for the purpose of preserving public health and public safety?**

Please provide evidence in support of your view.

I fully agree with this approach. I rescue Herring Gulls. They are subject to much abuse with people shooting them with air guns and the police are reluctant to intervene because of the perceived scope of the General Licence. There has been a considerable decline over the last ten years.

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)?

You have received only a small number of applications for licenses and a general licence will be open to abuse. A specific licence applied for allows more control. Pest controllers will do what is easiest and cheap. I operate a humane deterrence service and am a rescuer for Brent Lodge Bird and Wildlife Hospital. We will not look to the cheapest and easiest option that a pest controller will. What possible harm could a Robin or Blackbird do?

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

In respect of the new licence for the sale of live birds, we intend to **retain** an appendix, listing birds (primarily wildfowl) that do not require a ring to be sold under the licence. We have waived the normal ringing requirements for captive-bred specimens in the case of the species listed in the annex, which are commonly kept as ornamental birds, due to the practical difficulties of capturing and ringing wildfowl that are parent-bred on large ponds and lakes. The licence will also permit the sale of the eggs of the species listed on this annex.

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?

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.

8.1 We make no comment on these matters as they are beyond the remit of our organisation

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.

Agree this seems a logical approach

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?

I agree they should continue to be excluded, but do not agree that these birds pose a threat to British wildlife and are in fact a welcome and interesting addition to British fauna.

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?

I agree to much tighter controls on Eagle Owls, so yes.

Question 9.4: Do you believe that other bird species should be added to the list of exclusions on the grounds of potential risks to native species? Please consider the possible candidates suggested above;

Agree if it restricts sales of these birds, but not if it leads to persecution as several birds listed are already established.

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?

Do not agree with this: it will lead to more shooting of these birds and the crippling rate is over 50%. This is not to be encouraged.

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

Agree with this wording, but Natural England must look at the abuse of captive reared birds and look to restrict those allowed to be bred under these 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.

There is almost total ignorance of the General licence system. No one knows if you need to apply for it and even police wildlife offices are unsure. This is why it is too cheap and convenient and open to abuse. We had to send details around to all police stations in West Sussex detailing the General licence requirements regarding non protected bird species. Health and Safety reasons can mean in some people's mind. Grandma getting asthma because a birdts on a roof.

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

However, as you are stuck with it, why not ensure all police stations have details for public show and all veterinary stations. All police wildlife officers and RSPCA should also have full details in a pamphlet. This way they could refer to it in disputes.

Simon Wild
Director