



Department  
for Environment  
Food & Rural Affairs

# Wild Birds: General Licence Review

Background and summary of survey responses

Date: March 2021

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## Introduction

Wildlife licensing is a devolved matter, although all the nations operate under the same or similar legislative framework. On 14 June 2019 Defra, working closely with Natural England, launched a Defra-led review on general licences to kill or take wild birds for specific purposes in England. The aim of the review was to deliver a robust system of licensing to manage the issues that arise between the protection of wild birds and the legitimate activities people need to carry out for specific purposes – in the case of these licences, preventing serious damage, including to livestock and crops, conservation purposes and public health and safety.

In parallel to seeking information in an online survey, Defra and Natural England conducted a series of workshops. Defra also commissioned its scientific adviser, the Animal and Plant Health Agency's National Wildlife Management Centre, to compile and consider other available evidence, such as scientific papers and research, to inform the review.

This report and its annexes set out the findings of the online survey and the APHA scientific review. It also details Defra's approach to considering this scientific and experiential evidence including using a framework of eight tests.

These tests are used to consider the inclusion of individual species for each of the three licence themes: conservation; public health & public safety; and serious damage. The report also explores APHA's review of alternative non-lethal methods and their applicability to each species controlled under general licence.

## Background

All wild birds are protected under the Wildlife and Countryside Act 1981. However, the 1981 Act recognises that some birds can cause problems and allows people to act under a licence for legitimate purposes subject to specified conditions.

General licences allow people in certain prescribed circumstances and under the terms of a licence to carry out what would otherwise be an offence under the 1981 Act i.e. they are relied on for the killing or taking of certain wild birds for specific purposes, which would otherwise be unlawful.

They are used for activities that carry a low risk to the conservation or welfare of the species being controlled under the licence. Unlike individual licences, users do not need to apply for a general licence or report on its use, but they must comply with the conditions of

the general licence. The issuing of general licences is provided for in Section 16 of the 1981 Act.

On 25 April 2019, Natural England (NE) revoked its three general licences which enabled users to kill or take certain species of wild birds to:

- Prevent serious damage to livestock, crops, fisheries etc., and to prevent the spread of disease (GL04);
- Preserve public health or public safety (GL05); and
- Conserve wild birds and flora or fauna (GL06).

In May 2019 Defra took over responsibility for general licensing. Defra then launched a short call for evidence, which resulted in over 4,000 responses being received in just over a week.

On 14 June 2019, the Department launched the review and published the 2019/20 general licences (GL34, GL35 and GL36). These 2019/20 licences were interim licences pending the outcome of the full review and reflected the findings of the short call for evidence. They allowed users to continue to control certain species of wild birds for the same purposes as the revoked original licences.

The 2019/20 general licences did not permit acts under the licence in or near European protected sites, as a Habitats Regulations Assessment was needed to determine the impact of licensed activity on the sites and develop any associated conditions.

## Key elements of the review

The review looked at several aspects of the general licensing regime. These were:

- Species purpose combinations – which species should be controlled for what purposes and what additional specificity (such as sub-purposes and geographical or temporal restrictions) should be applied
- Enforceability – options for improving enforceability, including clarification of terms, recording and reporting actions undertaken under licence
- Welfare – the impacts of trapping and shooting activities undertaken under the licences and how to improve welfare through revised licence conditions
- European protected sites – impacts from activities undertaken under the licences and how to mitigate that
- Alternative measures – which legal measures are or can be used and how effective they are or can be. How should these be employed in relation to licensed activities
- Accessibility and clarity of licences – to ensure users can understand the requirements of the licences and have access to supplementary advice
- Longer term measures – such as regulatory reform, reporting and trap tagging requirements

To inform our policy considerations we sought information from licence users (who provided experiential evidence) and others with an interest in how a future system of general licensing might operate, both through an online survey and a number of workshops, and scientific evidence from a commissioned review of published scientific papers and research.

## Obtaining practitioner experiential evidence

### Online survey

As part of the process of consulting and engaging with stakeholders for the review, we launched in September 2019 an online survey using the Government’s “Citizen Space” platform. The survey sought to build upon the information that stakeholders provided as part of the short call for evidence in May 2019<sup>1</sup>, seeking greater detail on how and when users rely upon the general licences.

In the survey Defra asked stakeholders a range of questions divided into themes to inform future general licensing arrangements, in particular:

- **Species-purpose combinations (themes A to C):** respondents were asked which wild bird species should and should not be included on licences for each purpose and requested that they justify their answer with scientific and/or practitioner experiential evidence.
- **Alternatives to lethal control (theme D):** respondents were asked which alternative methods they had used or knew about to control birds causing problems, and for evidence of their effectiveness;
- **Record keeping (theme E):** users were asked specifically whether they keep records of their actions under the general licences and, if so, what type of records they keep and how long it takes them to do that; and
- **General views (theme F):** respondents were invited to give their views on the key issues, and on how the system of general licensing operates.

### Species considered under each theme

**Table 1** sets out which species were considered under each theme. Those in themes A-C reflect those listed in the interim general licences GL34, GL35 and GL36. Theme D considered all the species covered by the three general licences

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<sup>1</sup> <https://www.gov.uk/government/consultations/use-of-general-licences-for-the-management-of-certain-wild-birds-a-call-for-evidence>

Table 1: species considered in each theme

Theme	Species
<p><b>A</b> - to conserve wild birds and to conserve wild fauna and flora (<b>GL34</b>)</p>	<p>Canada Goose - <i>Branta Canadensis</i>            Carrion Crow - <i>Corvus corone</i>            Egyptian Goose - <i>Alopochen aegyptiacus</i>            Indian House Crow - <i>Corvus splendens</i>            Jackdaw - <i>Corvus monedula</i>            Jay - <i>Garrulus glandarrus</i>            Magpie - <i>Pica pica</i>            Monk Parakeet - <i>Myiopsitta monachus</i>            Ring-necked Parakeet - <i>Psittacula krameri</i>            Rook - <i>Corvus frugilegus</i>            Sacred Ibis - <i>Threskiornis aethiopicus</i></p>
<p><b>B</b> - to preserve public health or public safety (<b>GL35</b>)</p>	<p>Canada Goose - <i>Branta Canadensis</i>            Carrion Crow - <i>Corvus corone</i>            Feral Pigeon - <i>Columba livia</i>            Jackdaw - <i>Corvus monedula</i>            Magpie - <i>Pica pica</i>            Monk Parakeet - <i>Myiopsitta monachus</i>            Rook - <i>Corvus frugilegus</i></p>
<p><b>C</b> - to prevent serious damage (<b>GL36</b>)</p>	<p>Canada Goose - <i>Branta Canadensis</i>            Carrion Crow - <i>Corvus corone</i>            Egyptian Goose - <i>Alopochen aegyptiacus</i>            Feral Pigeon - <i>Columba livia</i>            Jackdaw - <i>Corvus monedula</i>            Magpie - <i>Pica pica</i>            Monk Parakeet - <i>Myiopsitta monachus</i>            Ring-necked Parakeet - <i>Psittacula krameri</i>            Rook - <i>Corvus frugilegus</i>            Woodpigeon - <i>Columba palumbus</i></p>
<p><b>D</b> - Alternatives to lethal control</p>	<p>Canada Goose - <i>Branta Canadensis</i>            Carrion Crow - <i>Corvus corone</i>            Egyptian Goose - <i>Alopochen aegyptiacus</i>            Feral Pigeon - <i>Columba livia</i>            Indian House Crow - <i>Corvus splendens</i>            Jackdaw - <i>Corvus monedula</i>            Jay - <i>Garrulus glandarrus</i>            Magpie - <i>Pica pica</i>            Monk Parakeet - <i>Myiopsitta monachus</i>            Ring-necked Parakeet - <i>Psittacula krameri</i>            Rook - <i>Corvus frugilegus</i>            Sacred Ibis - <i>Threskiornis aethiopicus</i>            Woodpigeon - <i>Columba palumbus</i></p>

## Assessing the survey respondent's supporting evidence

As part of the review respondents were asked to support their answers with scientific and/or experiential evidence. They were asked to give literature references where possible, and confirmation as to the level of experience of licence use, relevant species or alternative measures. They were asked to be as specific as possible in giving their evidence, confining their answer to a maximum of 500 words and to refer to particular species directly i.e. carrion crow, rather than groups of species such as corvids.

These responses were coded to allow for further assessment by Defra by recording the frequency that key words and phrases were used by respondents. This was then used to create the statistics quoted in the survey response summaries found in both this report and annex 3.

The responses were also graded with a score between 0 and 2:

0. No experience described of controlling wild birds or being impacted by them (simple statements e.g. 'crows eat birds')
1. Describes some experience of controlling wild birds or experience of authorising others to do so (i.e. has direct experience of acting, or authorising others to act, under a general licence) and provides some information in relation places, specific costs, numbers of birds involved etc. - seems relevant and realistic for the species concerned (not using the same evidence for multiple species)
2. Describes persuasive and extensive experience of controlling wild birds or being impacted by them. Describes in detail the majority of the following – species, level of impact, quotes places, specific costs, and number of birds and effectiveness of actions. Seems highly relevant and realistic for the species and purpose concerned

The grading of evidence quality was important to ensure that it wasn't simply the number of respondents who expressed a need but the quality of the experiential evidence that supported it, which was considered by the review.

If the evidence included references to published studies (e.g. 'newton et el 2019') it was referred to the APHA expert panel to ensure the study was considered as part of their review of the scientific evidence.

## Who responded to the survey?

We received **4433** responses to our Citizen Space survey of which **3910** came from individuals and **523** from representative groups, organisations or businesses.

The groups, organisations or businesses that responded included families, shoots, farms, estates, fisheries, angling trusts, pest control companies and national representative



organisations. These represented a wide range of interests including environmental, conservation, welfare, fisheries, farming and land management.

We received fifteen responses from national representative organisations. Their responses are summarised on page 26 of this report.

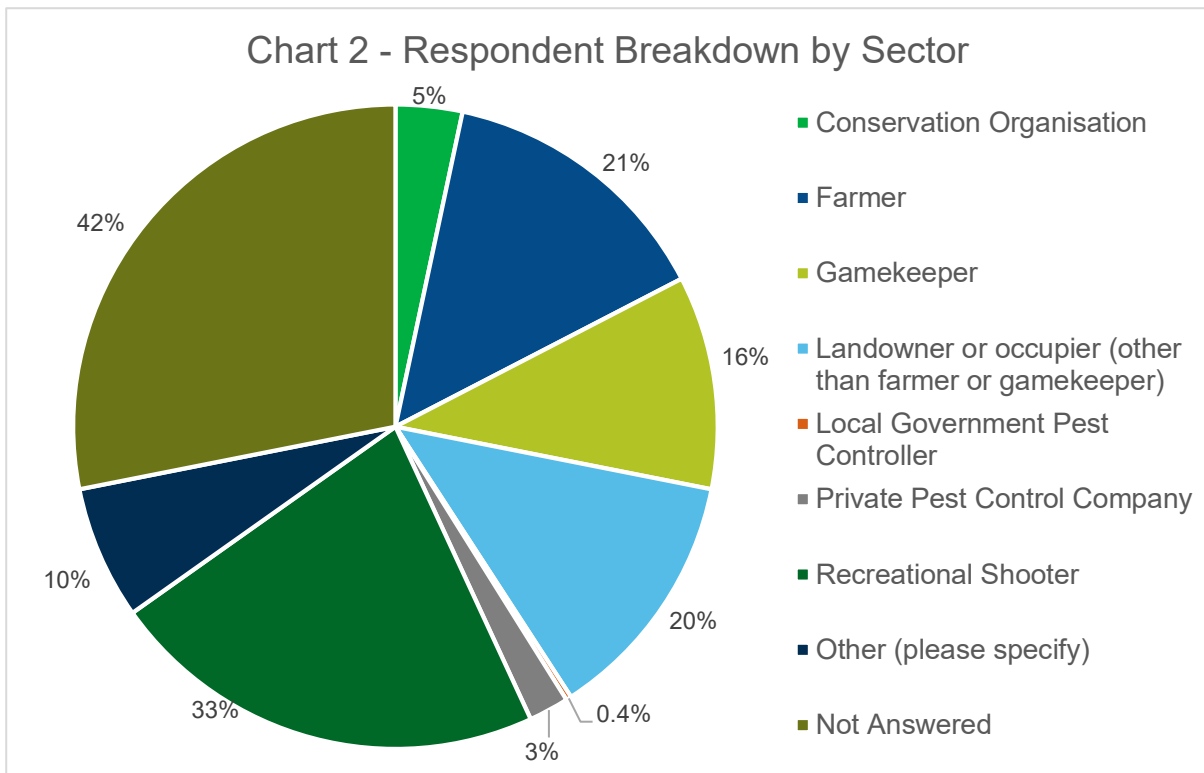
**Table 2 and Chart 2** provides a breakdown of respondents by sector (to note respondents could choose not to provide this information and were permitted to select more than one sector). Many respondents who answered the question said they were recreational shooters, as well as one or more of the other sectors. As a result, the figures add up to more than 100%

Table 2: Survey respondents by sector

Sector	Number	% of respondents
Conservation Organisation	238	5
Farmer	940	21
Gamekeeper	710	16
Landowner or occupier (other than farmer or gamekeeper)	881	20
Local Government Pest Controller	19	0.4
Private Pest Control Company	135	3
Recreational Shooter	1469	33
Other (please specify)	455	10
Not Answered	1878	42

The main respondent groups who selected 'Other' and specified why, were;

1. Anglers and fisheries interests who control birds under other types of licence
2. Non-commercial private pest controllers who control birds as a free service
3. Wildlife/conservation interests who don't use general licences to control birds
4. Countryside and country sports interests who don't use general licences to control birds



## Summary of responses on how licence users rely on the general licence

We asked respondents to tell us if and how they rely on general licences, and this is summarised in **Table 3 and Chart 3**. Respondents were asked several questions which had to be answered Yes or No.

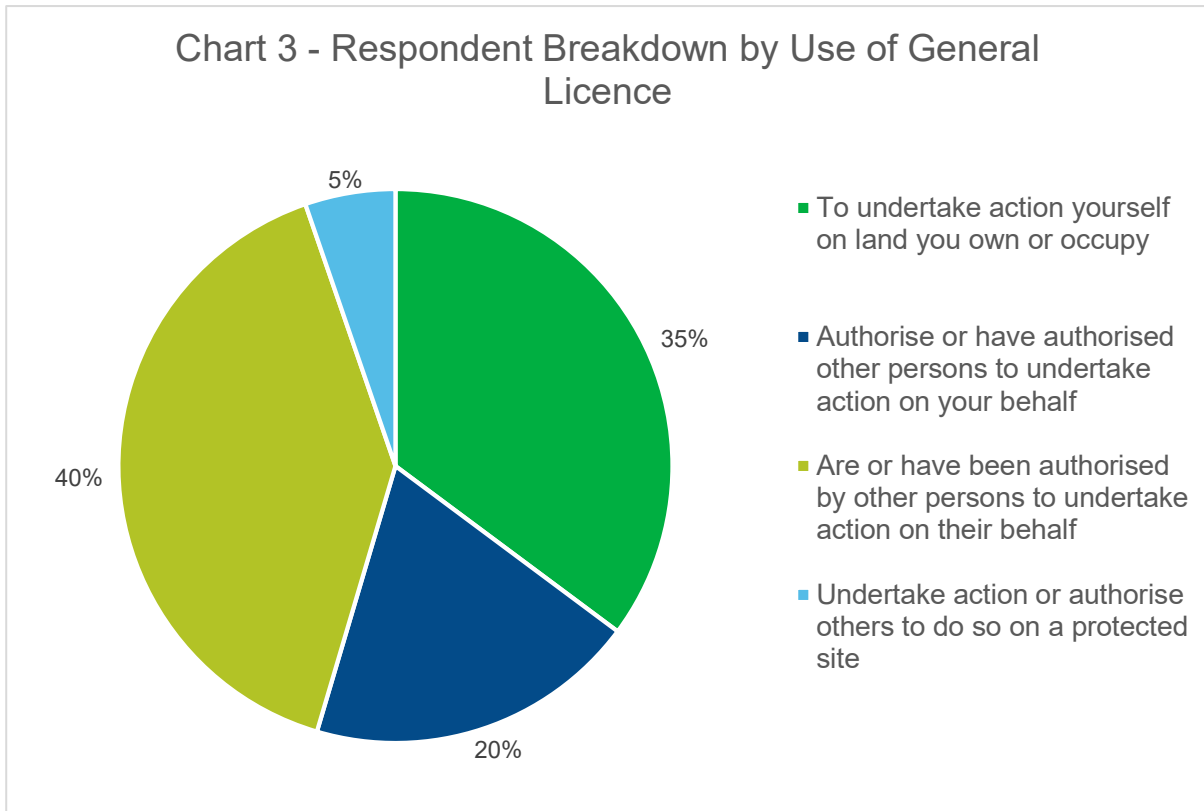
Some said Yes to more than one question (for example they use general licences to control wild birds themselves and also to authorise other persons to do so on their behalf).

Some respondents said No to all of the questions – presumably because they either did not want to say how they rely on general licences or because they do not use general licences to control wild birds (for example, a large % of respondents control cormorants under other types of licence).

Table 3: Survey summary of how the respondents who answered Yes to the questions, rely on the general licences.

How respondents rely on the general licences	Number	% of respondents
undertaken action yourself	1568	35
authorised other persons	864	20

been authorised by other persons	1789	40
undertaken action or authorised others to on a protected site	235	5



## Species purpose combinations

### Theme A – to conserve wild birds and to conserve wild fauna and flora

In this section of the survey, we asked respondents to identify which wild bird species they consider need to be controlled, and those that should not be controlled, under a general licence for the purpose of conservation. We also asked respondents to provide evidence (as set out in the survey questionnaire) to support their view. This purpose covers the conservation of other wild birds, other animals (fauna) or plants (flora).

We asked three questions:

**Question A1** - Which bird species do you consider need to be controlled under general licence for conservation purposes and why?

**Question A2** - Do you consider that any other bird species need to be controlled under general licence for conservation purposes?

**Question A3** - Are there any bird species listed below that you consider should NOT be controlled under general licence for conservation purposes?

## **Theme B – to preserve public health or public safety**

In this section of the survey, we asked respondents to identify which wild bird species they consider need to be controlled, and those that should not be controlled, under general licence for the purpose of preserving public health or safety. We also asked respondents to provide evidence to support their view. This purpose covers the prevention of slips and falls, spread of human disease, issues in relation to birds nesting and other reasons.

We asked three questions:

**Question B1** - Which bird species do you consider need to be controlled under general licence for preserving public health and public safety purposes and why?

**Question B2** - Do you consider that any other bird species need to be controlled under general licence for preserving public health and public safety purposes?

**Question B3** - Are there any bird species listed below that you consider should NOT be controlled under general licence for preserving public health and public safety purposes?

## **Theme C – to prevent serious damage**

In this section of the survey we asked respondents to identify which wild bird species they consider need to be controlled, and those that should not be controlled, under a general licence for the purpose of preventing serious damage, and to provide evidence to support their view. This purpose covers the prevention of serious damage to livestock, feedstuffs for livestock, crops, vegetables, fruit, growing timber, fisheries or inland waters.

**Question C1** - Which bird species do you consider need to be controlled under general licence for preventing serious damage purposes and why?

**Question C2** - Do you consider that any other bird species need to be controlled under general licence for preventing serious damage purposes?

**Question C3** - Are there any bird species listed below that you consider should NOT be controlled under general licence for preventing serious damage purposes?

A summary of survey results for themes A-C are included in each species purpose statement in Annex 3.

## **Other survey themes**

### **Theme D – Alternatives to lethal control**

In this section of the survey, we asked respondents to tell us about what alternative measures they had used or know about to kill or take wild birds under a general licence. We also asked respondents to provide evidence they had about how well these alternative measures work. There were two questions in this theme.

Firstly, respondents were given a matrix of the 13 species currently controlled under the three general licences (see table 1) and 6 non-lethal control measures to select from.

The measures were:

- a) audio-visual deterrents;
- b) chemical repellents;
- c) exclusion;
- d) habitat management;
- e) livestock/crop management; and
- f) others.

For any selection made respondents were requested to provide evidence (scientific and practitioner) on how well the alternatives worked for each species.

We asked two questions:

**Question D1** - For each species where you have knowledge of alternative measures to killing or taking, can you indicate what evidence you have for its effectiveness?

**Question D2** - If you have proposed additional species for inclusion on a general licence in Themes A-C, do you have knowledge of the use of one or more alternative measures when acting under the purposes in this survey for those species?

A summary of the survey results for theme D can be found on page 15 of this report.

## **Theme E – Record keeping**

In this section of the survey we asked respondents to tell us whether they kept records when killing or taking birds under the purposes covered by this survey, what sort of records they kept and how long it took them to make these records.

We asked three questions:

**Question E1** - When killing or taking birds for the purposes covered by this survey, do you keep records of what you have done?

**Question E2** - “If you do keep records, for each time you kill or take birds for one of these purposes, what sort of record do you make?”

**Question E3** - “How long do you estimate it takes you to compile these records each time?”

A summary of the survey results for theme E can be found on page 21 of this report.

## Theme F – Stakeholder views on the role of general licences to manage wild birds

In this section of the survey we asked respondents for their views on any issues not covered in the rest of the survey in relation to the current general licensing system. We sought their views about what they considered to be the key issues in relation to the general licensing of wild bird control, and the way the system of general licensing operates.

We asked two questions:

**Question F1** - “Please tell us whether there are any other key issues you would like to highlight in relation to the general licensing of wild birds that are not covered in this survey?”

**Question F2** - “Are there any other issues related to the operation of general licensing in relation to wild birds that you would like to raise?”

A summary of the survey results for theme F can be found on page 24 of this report.

## Workshops

A number of workshops were run to complement the online survey, covering shooting and conservation interests, pest controllers, environmental and welfare groups, farmers and other landowners.

Defra carried out:

- four initial sessions with each of the key stakeholder groups (shooting and landowning, conservation and welfare, farming, and pest control) to enable them to share their views and feed into proposals for change;
- three workshops on trapping and welfare, with a range of interested stakeholders from each of the key groups, to discuss what conditions and advice should be required in the new general licences and/or the stand alone GL33 standard licence conditions around the trapping of wild birds and the use of decoy birds<sup>2</sup>. These workshops considered key issues emerging from discussion with NE in 2019, and different approaches to trapping across the devolved administrations; and
- three initial workshops on the future approach to licensing in and near protected sites, again attended by a spectrum of interested stakeholders, followed by a

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<sup>2</sup> <https://www.gov.uk/government/publications/standard-licence-conditions-for-trapping-wild-birds-and-using-decoys-gl33>

meeting with a self-selected user stakeholder group on applying licence conditions and buffer zones to vulnerable sites.

## Review of the scientific evidence

As part of the 2019 review, Defra asked The Animal and Plant Health Agency (APHA) to review and evaluate relevant scientific literature in relation to Defra's review of general licencing. the fifteen avian species listed on general licences GL04-06 in respect to the strength of evidence of scientific literature for their inclusion under general licences that allow certain species to be killed or taken for various purposes. Prior to the start of APHA's review, two species (lesser black-backed gull and herring gull), were removed from the list of permitted target species and therefore the review considered the thirteen species listed on GL34-36 (see table 1).

The review of the scientific evidence for the inclusion of species on the three general licences built on the existing reference database and methodology established by the British Trust for Ornithology (BTO) as part of their evaluation of the evidence base for inclusion of bird species listed on general licences in Scotland<sup>3</sup>.

The full review is in Annex 1 - 'Review of the evidence base for inclusion of avian species on General Licences GL34, GL35 and GL36 in England'.

## Summary of survey results

### Summary of survey results: Themes A-C - Species purpose combinations

This is set out in each species-purpose policy assessment (see Annex 3)

### Summary of survey results: Theme D - Alternatives to lethal control

4,289 (97%) of survey respondents indicated alternative measures were used.

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<sup>3</sup> Newson, S.E., Calladine, J. & Wernham, C. 2019. Literature review of the evidence base for the inclusion of bird species listed on General Licences 1, 2 and 3. Scottish Natural Heritage Research Report No. 1136.

Over 429 10% of these respondents indicated alternative measures used for each of 7 species (Canada goose 537 (12%), carrion crow (748 (17%), feral pigeon 685 (15%), jackdaw 558 (13%), magpie 531 (12%), rook 626 (14%) and wood pigeon 854 (19%)).

386 (9%) respondents indicated alternative measures for Jays.

Respondents for other species (Egyptian goose, Indian house crow, monk parakeet, ring-necked parakeet and sacred ibis) ranged between 2% and 4%.

For all the 13 species, over 40% respondents indicated they used each alternative measure. However, there were fewer responses to evaluate the effectiveness of the measures for each species. Generally, 'audio-visual deterrents' and 'others' were the most frequently selected with most evidence provided for these two options.

Secondly, where respondents had proposed additional species on a general licence in Themes A-C, they were required to state any known alternatives measures when acting under any of the purposes for those species. We also asked for evidence on individual species as above. 706 (16%) of survey respondents indicated additional species and alternative measures used.

574 (81%) of the 706 respondents indicated measures used and the effectiveness of each measure for cormorants. Goosander came next with 56 (8%) respondents providing data. There was a departure from the trend with significant evidence provided for each alternative measure for cormorants. 24 other species were also mentioned but are immaterial with respondent numbers for each species being less than 2%.

## **D.1. For each species where you have knowledge of alternative measures to killing or taking, can you indicate what evidence you have for its effectiveness?**

### **Canada Goose**

537 (12%) of 4,289 respondents indicated the use of alternative measures for Canada Goose. For each option of alternative measures listed, over 40% of respondents indicated they used each one. The predominant measures were audio-visual deterrents with 475 (88%) respondents, other methods with 317 (59%) respondents and exclusion with 274 (51%) respondents.

218 (46%) respondents who used audio-visual deterrents cited habituation though initially effective whilst 139 (29%) recorded it ineffective. 105 (33%) respondents who indicated they used other measures indicated habituation and 97 (30%) considered it ineffective. There was limited data to determine the effectiveness of exclusion measures.



## **Carrion Crow**

748 (17%) of 4,289 respondents indicated the use of alternative measures for Carrion Crow. For each option of alternative measure listed, over 40% of respondents indicated they used each method. The most prevalent options were audio-visual deterrents with 672 (90%) respondents, other methods with 409 respondents (55%) and livestock/crop management with 396 (53%) respondents.

338 (50%) respondents who used audio-visual deterrents noted habituation though initially effective whilst 237 (35%) recorded it as ineffective. 128 (31%) respondents who indicated they used other measures indicated habituation and 119 (29%) considered it ineffective. For livestock/crop management 40 (10%) respondents indicated both habituation and ineffectiveness.

## **Egyptian Goose**

170 (4%) of 4,289 respondents indicated the use of alternative measures for Egyptian goose. For each option of alternative measure listed, over 40% of respondents indicated they used each method. The most prevalent options were audio-visual deterrents with 146 (86%), other methods with 104 (61%) respondents and exclusion with 89 (52%) respondents.

58 (40%) respondents who used audio-visual deterrents noted habituation though initially effective whilst 34 (23%) recorded it ineffective. 28 (27%) respondents who indicated they used other measures indicated habituation and 20 (19%) considered it ineffective. There was inadequate evidence to determine the effectiveness of using exclusion measures.

## **Feral Pigeon**

685 (16%) of 4,289 respondents indicated use of alternative measures for feral pigeon. For each option of alternative measure listed, over 40% of respondents indicated they used each method. The most prevalent options were audio-visual deterrents with 619 (90%), exclusion with 402 (59%) respondents and other methods with 369 (54%) respondents.

292 (47%) respondents who use audio-visual deterrents noted habituation though initially effective whilst 210 (34%) recorded it ineffective. 106 (29%) respondents who indicated they used other measures indicated habituation and 104 (28%) considered it ineffective. 54 (13%) respondents who indicated they used exclusion measures indicated that it was ineffective and 38 (9%) indicated habituation.

## **Indian House Crow**

164 (4%) of 4,289 respondents indicated use of alternative measures for Indian house crow. For each option of alternative measure listed, over 40% of respondents indicated they used each method. The most prevalent options were audio-visual deterrents with 144

(88%) respondents, other methods with 98 (60%) respondents and exclusion with 80 (49%) respondents.

48 (33%) respondents who use audio-visual deterrents noted habituation though initially effective whilst 40 (28%) recorded it ineffective. 25 (26%) respondents who indicated they used other measures indicated that it was ineffective and 19 (19%) highlighted habituation. There was limited evidence on the effectiveness of exclusion as an alternative measure.

### **Jackdaw**

558 (13%) of 4,289 respondents indicated use of alternative measures for jackdaw. For each option of alternative measure listed, over 40% of respondents indicated they used each method. The most prevalent options were audio-visual deterrents with 506 (91%) respondents, other methods with 323 (58%) respondents and exclusion with 296 (53%) respondents.

260 (51%) respondents who use audio-visual deterrents noted habituation though initially effective whilst 165 (33%) recorded it ineffective. 101 (31%) respondents who indicated they used other measures indicated habituation and 100 (31%) considered it ineffective. 30 (10%) respondents who used exclusion measures indicated that it was ineffective and 24 (8%) stated habituation.

### **Jay**

368 (9%) of 4,289 respondents indicated use of alternative measures for jays. For each option of alternative measure listed, over 40% of respondents indicated they used each method. The most prevalent options were audio-visual deterrents with 318 (86%) respondents, other methods with 217 (59%) respondents and exclusion with 183 (50%) respondents.

139 (44%) respondents who use audio-visual deterrents noted habituation though initially effective whilst 104 (33%) recorded it ineffective. 61 (28%) respondents who indicated they used other measures indicated that it was ineffective and 57 (26%) noted habituation. 29 (16%) respondents who used exclusion measures indicated ineffectiveness and habituation.

### **Magpie**

531 (12%) of 4,289 respondents indicated use of alternative measures for magpies. For each option of alternative measure listed, over 40% of respondents indicated they used each method. The most prevalent options were audio-visual deterrents with 455 (86%) respondents, other methods with 315 (59%) respondents and exclusion with 273 (51%) respondents.

196 (43%) respondents who use audio-visual deterrents noted habituation though initially effective whilst 147 (32%) recorded it ineffective. 97 (31%) respondents who indicated

they used other measures indicated it was ineffective and 95 (30%) stated habituation. 48 (17%) respondents who used exclusion measures indicated ineffectiveness and habituation.

### **Monk Parakeet**

86 (2%) of 4,289 respondents indicated use of alternative measures for monk parakeet. For each option of alternative measure listed except chemical repellents, over 50% of respondents indicated they used each method. The most prevalent options were audio-visual deterrents with 72 (83%) respondents, other measures with 50 (58%) respondents and exclusion with 48 (56%) respondents.

A total of 33 (46%) respondents who use audio-visual deterrents noted habituation and ineffectiveness. 17 (34%) respondents who indicated they used other measures also indicated that it was ineffectiveness and habituation. 11 (22%) respondents who used exclusion measures indicated that it was effective but expensive.

### **Ringed-neck Parakeet**

89 (2%) of 4,289 respondents indicated use of alternative measures for ring-necked parakeets. For each option of alternative measure listed except chemical repellents, over 50% of respondents indicated they used each method. The most prevalent options were audio-visual deterrents with 74 (83%) respondents, exclusion with 52 (58%) respondents other measures with 51 (57%) respondents.

A total of 38 (51%) respondents who use audio-visual deterrents noted habituation and ineffectiveness. 18 (35%) respondents who indicated they used other measures also indicated that it was ineffective and prone to habituation. 6 (12%) respondents who used exclusion measures indicated that it was effective but expensive whilst another 6 (12%) respondents indicated that it was ineffective.

### **Rook**

626 (15%) of 4,289 respondents indicated use of alternative measures for rooks. For each option of alternative measure listed except chemical repellents, over 40% of respondents indicated they used each method. The most popular options were audio-visual deterrents with 583 (93%) respondents, other measures with 360 (58%) respondents and exclusion with 318 (51%) respondents.

283 (49%) respondents who use audio-visual deterrents noted habituation though initially effective whilst 201 (34%) recorded it ineffective. 115 (32%) respondents who indicated they used other measures indicated that it was ineffective and 103 (29%) noted habituation. 44 (14%) respondents who used exclusion measures indicated ineffectiveness and habituation.

## **Sacred Ibis**

66 (2%) of 4,289 respondents indicated use of alternative measures for sacred ibis. For each option of alternative measure listed except chemical repellents, over 50% of respondents indicated they used each method. The most popular options were audio-visual deterrents with 52 (79%) respondents, other measures with 36 (54%) respondents and livestock/crop management with 34 (52%) respondents.

21 (40%) respondents who use audio-visual deterrents noted habituation though initially effective and 6 (12%) recorded it ineffective. Respondents who indicated they used other measures and livestock/crop management measures did not provide adequate evidence to gauge effectiveness of the measures.

## **Wood Pigeon**

854 (20%) of 4,289 respondents indicated use of alternative measures for wood pigeons. For each option of alternative measure listed except chemical repellents, over 40% of respondents indicated they used each method. The most popular options were audio-visual deterrents with 807 (95%) respondents, other measures with 470 (55%) respondents and exclusion with 434 (51%) respondents.

416 (53%) respondents who use audio-visual deterrents noted habituation though initially effective whilst 311 (39%) recorded it ineffective. 157 (33%) respondents who indicated they used other measures indicated that it was ineffective and 123 (26%) stated habituation. 47 (11%) respondents who used exclusion measures indicated that it was ineffective, 27 (6%) indicated it was impractical and 26 (6%) noted habituation.

## **D.2. If you have proposed additional species for inclusion on a general licence in Themes A-C, do you have knowledge of the use of one or more alternative measures when acting under the purposes in this survey for those species?**

### **Cormorants**

574 (81%) of 706 respondents indicated use of alternative measures for cormorants. A significant number of respondents indicated they used each method: The number of respondents for each option is as follows: 507 (88%) audio-visual deterrents, 505 (88%) for other methods, 428 (75%) for exclusion, 403 (70%) for habitat management, 383 (67%) for livestock/crop management and 322 (56%) for chemical repellents.

258 (51%) respondents who use audio-visual deterrents noted it was ineffective, 150 (30%) noted habituation though initially effective whilst 78 (15%) recorded that methods had to be varied. 218 (43%) respondents who indicated they used other measures indicated that it was ineffective, 106 (21%) stated habituation and 56 (11%) varied methods in its use. 169 (39%) respondents who indicated they used exclusion measures

indicated that it was ineffective, 70 (16%) indicated methods had to be varied and 64 (15%) stated habituation.

139 (34%) respondents who use habitat management noted it was ineffective, 66 (16%) noted that methods had to be varied and 51 (13%) noted habituation. 121 (32%) respondents who indicated they used livestock/crop management measures indicated that it was ineffective, 60 (16%) noted methods had to be varied and 37 (10%) noted habituation. 66 (21%) respondents who indicated they used chemical repellents that it was ineffective, 24 (7%) indicated habituation and 12 (4%) noted methods had to be varied.

For each alternative measure, respondents indicated that the methods were time consuming and took a lot of effort to implement.

## **Goosander**

56 (8%) of 706 respondents indicated use of alternative measures for goosanders. For each option of alternative measure listed except chemical repellents, over 50% of respondents indicated they used each method. The most popular options were audio-visual deterrents with 47 (84%) respondents and other measures with 49 (55%) respondents and habitat management with 34 (61%) respondents.

27 (57%) respondents who use audio-visual deterrents noted ineffectiveness and habituation. 33 (67%) respondents who indicated they used other measures also indicated ineffectiveness and habituation. 8 (23%) respondents who indicated they used habitat management methods indicated that it was ineffective and impractical.

## **Summary of survey results: Theme E - Record keeping**

### **E.1. - When killing or taking birds for the purposes covered by this survey, do you keep records of what you have done?**

2,226 (51.11% of total respondents) respondents answered Question E.1

In response to this question 911 (40.2%) of QE.1. respondents indicated they kept records.

In response to this question 1,355 (59.8%) of QE.1. respondents indicated they had not kept records.

The two sectors people identified as belonging to the most, who answered this question, were the recreational shooting and farming sectors (to note respondents could identify themselves as belonging to more than one sector).

Table 4: The number of respondents who indicated they did not keep records by sector

User Group	No of respondents who did not keep records	As a % of those respondents who answered QE.1
Recreational Shooter	581	25.64
Farmer	377	16.64

Table 5: The number of respondents who indicated they did keep records by sector

User Group	No of respondents who did keep records	As a % of those respondents who answered QE.1
Recreational Shooter	450	19.86
Farmer	314	13.86

## E.2. - “If you do keep records, for each time you kill or take birds for one of these purposes, what sort of record do you make?”

652 (14.7% of total respondents) of respondents answered QE.2

Respondents indicated they kept a range of different record types including the species and number controlled, the date and time for when action was taken, where the action took place, the method of control and for what general licence purpose the action was taken.

Where information was clearly provided this is summarised in Table 6 and Table 7. Respondents could select more than one record type.

Table 6: The types of records kept by respondents (where this was clearly stated)

Record type	No of respondents who kept this type of record	As a % of those respondents who answered QE.2
Species controlled	569	87.27
Date and time of action taken	484	74.23

<b>Where the action was taken</b>	460	70.55
<b>Method of control</b>	415	63.65
<b>Which general licences purpose</b>	229	35.12
<b>Number of animals controlled</b>	40	6.13

Respondents often indicated they recorded certain information in combination.

Table 7: The types of records kept by respondents in combination (where this was clearly stated)

<b>Record type</b>	<b>No of respondents who kept this type of record</b>	<b>As a % of those respondents who answered QE.2</b>
<b>Date and Time of action taken</b>	484	74.23
<b>Date + Where action was taken</b>	410	62.88
<b>Date + Where action was taken + Species</b>	400	61.35
<b>Date + Where action was taken + Species + Method</b>	321	49.23
<b>Date + Where action was taken + Species + Method + Purpose</b>	175	26.84
<b>Species + Number of animals controlled</b>	32	4.91

### E.3. - “How long do you estimate it takes you to compile these records each time?”

591 (13.33% of total respondents) respondents answered QE.3. Of these 538 provided a clear indication of the length of time it took to make a record of action under general licence.

Table 8: The time taken to make records (where this was clearly stated)

Time taken to make record	No of respondents who selected this timeframe	As a % of those respondents who answered QE.3
up to 10 minutes	406	68.70
10-30 minutes	102	17.26
30 minutes to 1 hour	20	3.38
1-2 hours	10	1.69

## Summary of survey results: Theme F - Stakeholder views on the role of general licences to manage wild birds

There were 1503 responses to question F1 and 737 responses to question F2. The responses could cover a number of issues and many did.

163 responses were not relevant to the general licensing of wild birds, for example the general licenced control of mammals.

566 made comments covered elsewhere in the survey. Where these hadn't already been expressed in the relevant theme (A-E), we ensured they were considered in our analysis of the theme concerned.

689 responses expressed a general opinion regarding the general licensed control of pest birds and 335 responses raised other issues concerning the operation of the general licensing system and in particular the general licensing of wild bird control.

Table 9: Type of statements made in Theme F

General position statements	No of statements
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Leave the general licences as they were – the system worked fine	261
Want unlicensed pest bird control – list as huntable species	174
Birds should be controlled under individual licence only	136
Birds should be controlled using non-lethal measures only	57
There should be recording /reporting requirements	38
There should be no recording /reporting requirements	13
Specifically oppose pest bird control for economic reasons	10
<b>Relevant to Themes A-E</b>	<b>No of statements</b>
Species x should be controlled under general licence for x reason	493
Species x should not be controlled under general licence for x reason	16
Knowledge and effectiveness of the use of alternative measures	45
Record keeping	12
<b>Top five issues relating to the operation of wild bird control general licensing</b>	<b>No of statements</b>
Licence clarity, ambiguity, simplicity	92
The enforcement of general licences – see general position statements 3 and 5 above	64

Transparency with regard to our review of general licences and the publication of evidence and data to support subsequent changes	53
Perceptions of bias against those who work in and manage the countryside and ignorance of the issues that affect them.	47
Make licences more flexible regarding population hot spots and timing of control - see position statements 2 above	27

## Summary of Organisational Responses to Survey

### Introduction

This section gives a summary of key points raised by seventeen national organisations in their responses to our survey but does not attempt to capture all views.

These organisations fall into two broad groups - those representing general licence (GL) users and those who are non-users but have views and insights as to the appropriateness of GLs.

Table 10: Grouping of organisations

General licence users	Non-users
National Farmers Union (NFU)	Royal Society for the Prevention of Cruelty to Animals (RSPCA)
Game & Wildlife Conservation Trust (GWCT)	Animal Aid (AA)
Royal Society for the Protection of Birds (RSPB)	Born Free Foundation (BFF)
Countryside Alliance (CA)	Wild Justice (WJ)
British Association for Shooting & Conservation (BASC)	Wild Animal Welfare Committee (WAWC)

<b>Wild Trout Trust (WTT)</b>	<b>Angling Trust (AT)</b>
<b>Tenant Farmers Association (TFA)</b>	<b>National Sheep Association (NSA)</b>
<b>National Pest Technicians Association (NPTA)</b>	<b>Songbird Survival (SS)</b>
<b>Wildlife Trusts (WT)</b>	

## **GWCT and NFU**

### **GWCT**

Of these responses, two involved the results of the organisation’s own survey. The NFU had responses from 159 members, 148 of whom had relevant experience of the GLs. Of these, 88.5% said that they use, or have used, a GL to kill or take wild birds on land that they own or occupy; 80.4% said they authorise or have authorised under a GL other persons to kill or take wild birds on land that they own or occupy; and 14.9% said they are or have been authorised by other persons under a GL to kill or take wild birds on land they do not own or occupy.

The NFU made clear that the information provided by NFU members demonstrated a considerable volume of anecdotal evidence. They stated their view that this evidence of the damage caused by certain wild bird species should not be discounted or downplayed because it was collected by farmers rather than scientists.

GWCT carried out a survey which received 2,951 responses. The survey was distributed to members of the following organisations: GWCT, National Gamekeepers Organisation (NGO), CA, SS, the Moorland Association, Guns on Pegs, the British Deer Society and the Country Land and Business Association.

Two thirds of responses were not from GWCT members. GWCT stated the importance of the insights provided in filling knowledge gaps by “drawing on the enormous breadth of knowledge amassed by those on the ground over many years. This working knowledge is developed by observation, by being out in the woods and fields every day for many years.” GWCT said that almost all participants reported having witnessed the species they controlled causing the damage that they described.

The overall results of the two NFU and CWCT surveys regarding species-purpose combinations are set out in tables 6 to 9 below. Respondents could select a species for more than one licence. Defra understands the heading of ‘Agriculture’ in these surveys to mean the GL purpose of ‘serious damage’

Table 11: Survey carried out by GWCT – the proportion of respondents who supported the inclusion of a species on the general licences for one or more of the three licences

Species	Proportion of respondents	Conservation	Agriculture	Public Health
<b>Carrion crow</b>	46%	76%	53%	5%
<b>Magpie</b>	54%	97%	11%	2%
<b>Rook</b>	17%	33%	84%	20%
<b>Jay</b>	13%	96%	7%	2%
<b>Jackdaw</b>	14%	50%	56%	33%
<b>Woodpigeon</b>	52%	3%	99%	6%
<b>Feral pigeon</b>	12%	9%	87%	60%
<b>Canada goose</b>	9%	15%	76%	36%
<b>Egyptian goose</b>	1%	55%	50%	18%
<b>Other species (desired)</b>	8%	60%	55%	24%

The GWCT response noted that, in relation to magpie, “nest raiding, nest robbing and nest predation were very frequently described”. Jays were described as “effective and expert egg thieves”.

In the GWCT survey, all of the corvid species apart from jay were implicated in deaths of young livestock. Crops at risk from jackdaw, rook, carrion crow and both pigeon species included wheat, barley, maize, oil seed rape, beans and peas.

The GWCT asked for Canada goose to be retained for the public health and public safety purpose. Nearly all respondents said they had witnessed the damage described particularly contamination caused by defecation of animal and human foodstuffs.

#### *Additional species*

Of responses to its survey, GWCT said: “The survey also gathered information on other species, not currently included on the general licences, that people would like to be able to

control, and the reasons for that. Two hundred and thirty-four people gave information in this part of the survey...

### Conservation

Some of its survey respondents had requested additional species including for “the protection of ground-nesting birds including waders and gamebirds, as well as songbirds and barn owls, from birds of prey such as buzzards and kites... The greater and lesser black-backed gulls are thought to impact on ground-nesting waders such as lapwing and curlew. Ravens are cited to ... predate the nests of ground-nesting birds ...and some respondents would like to control sparrowhawks to protect both game birds and songbirds.”

### Public health and public safety

GWCT said: “Eighty respondents [to their survey] described the damage caused by collared doves, particularly since they were removed from the General Licence. The need to control collared doves is felt mainly for agriculture and public health reasons... Public health reasons for collared dove control are mainly based around contamination caused by defecation.”

### Serious damage

GWCT said “Cormorants were often stated to cause damage to both commercial and wild fisheries... Ravens are cited to attack newborn lambs... Greylag geese are stated to cause damage to crops... Eighty respondents described the damage caused by collared doves, particularly since they were removed from the General Licence. The need to control collared doves is felt mainly for agriculture and public health reasons, but some for conservation. Farmers describe the loss of growing or stored grain to collared doves, as well as contamination by defecation. Damage is reported to crops such as oil seed rape, wheat, peas and brassicas.”

### NFU

Table 12: Survey carried out by NFU – proportion of respondents who supported the inclusion of a species on the serious damage general licence

Species	Protecting Livestock	Protecting livestock feedstuffs	Protecting crops	Protecting vegetables	Protecting fruit
<b>Canada goose</b>	3%	11%	41%	8%	3%
<b>Carrion crow</b>	60%	24%	32%	6%	7%
<b>Egyptian goose</b>	1%	5%	11%	4%	2%

<b>Feral pigeon</b>	5%	35%	64%	18%	8%
<b>Jackdaw</b>	24%	30%	31%	6%	8%
<b>Magpie</b>	57%	20%	10%	3%	5%
<b>Monk parakeet</b>	1%	1%	2%	1%	4%
<b>Ring-necked parakeet</b>	1%	1%	1%	1%	5%
<b>Rook</b>	28%	33%	70%	12%	7%
<b>Woodpigeon</b>	5%	27%	90%	33%	14%

In NFU survey responses, carrion crow, magpie, jackdaw and rook were all said to attack ewes and lambs. Reasons given for livestock feedstuffs for corvids and wood/feral pigeon centred on contamination and eating of the feed. They referred to the fact that woodpigeons can “decimate a crop leading to bare patches and weeds and the need for more herbicide”. Woodpigeon was said to be a particular concern for brassicas. Rooks were said to “damage newly sown crops on a large scale”.

Table 13: Survey carried out by NFU – proportion of respondents who supported the inclusion of a species on the conservation general licence

<b>Species</b>	<b>Conserving wild birds</b>	<b>Conserving flora (plants)</b>	<b>Conserving fauna (animals other than wild birds)</b>
<b>Canada goose</b>	4%	20%	3%
<b>Carrion crow</b>	55%	3%	18%
<b>Egyptian goose</b>	2%	7%	2%
<b>Indian House Crow</b>	4%	1%	1%
<b>Jackdaw</b>	32%	6%	8%
<b>Jay</b>	47%	1%	6%

<b>Magpie</b>	71%	1%	10%
<b>Monk parakeet</b>	2%	1%	0%
<b>Ring-necked parakeet</b>	2%	1%	1%
<b>Rook</b>	27%	14%	8%
<b>Sacred Ibis</b>	0%	0%	0%

Table 14: Survey carried out by NFU – proportion of respondents who supported the inclusion of a species on the preserving public health or public safety general licence

<b>Species</b>	<b>Preventing trips, slips and falls</b>	<b>Preventing spread of disease</b>	<b>Preventing birds nesting issues</b>
<b>Canada goose</b>	11%	8%	4%
<b>Carrion crow</b>	1%	7%	22%
<b>Feral pigeon</b>	15%	28%	8%
<b>Jackdaw</b>	2%	7%	14%
<b>Jay</b>	1%	1%	16%
<b>Magpie</b>	1%	3%	23%
<b>Monk parakeet</b>	1%	1%	1%
<b>Rook</b>	2%	8%	13%

#### *Additional species*

#### *Serious damage*

NFU's survey found demand from their respondents for raven (7.4% of respondents) as they attack young lambs; greylag/Brent goose (4.1%) as they cause crop loss and a hygiene hazard; starling (4.1%) as they contaminate feed; and buzzard (4.1%) as they have been seen to take poultry, lambs and piglets.

## Organisational responses (other than the NFU and GWCT)

### Native species

#### Conservation purpose

*Organisational proposals suggesting the retention of certain native species on the conservation licence*

Table 15: Organisations (other than NFU and GWCT) which supported the retention of native species on the conservation general licence

Species	Organisations in favour of GL inclusion
Canada goose	CA; BASC; AT
Carrion crow	CA; RSPB; BASC; WJ; TFA; NSA; SS
Jackdaw	CA; BASC; TFA
Jay	CA; BASC; TFA; SS
Magpie	CA; BASC; TFA; NSA; SS; NPTA
Rook	CA; BASC; TFA

The RSPB suggested that England should take the same approach as in Wales and revise the purpose of the conservation GL to focus on the conservation of wild birds. They said they would not object to the retention of carrion crow but considered individual licences to be more appropriate. If carrion crow is to stay on the GL then it should be restricted to the conservation of certain ground-nesting species that are known to be threatened. They also pointed to the need for clarification on the issue of carrion crow control on grouse moors and lowland shoots where it often takes place to increase the shootable surplus of gamebirds and not for the conservation of wild birds, which is not a lawful purpose under a GL.

BASC and CA asked for the retention of all species. BASC presented a range of supporting scientific and practitioner experiential evidence. CA mentioned all corvids as significant nest predators.

WJ accepted a need to control carrion crow for conserving wild birds but stated that the bird species of conservation concern that could be impacted by carrion crows at a national level were limited and “any new general licence issued for the purposes of conserving wild birds must take these limited species and their limited distribution into full account”. They



stated that a “general licence allowing lethal control of Carrion Crows at any time of year... and in any location... is not warranted”.

TFA made the case for retaining carrion crow, jackdaw, magpie and rook for conserving wild birds and fauna, and jay for wild birds only. In relation to carrion crow, and rook, they stated that they had “numerous examples of a lot of farmers up and down the country who frequently witness [these species] destroying the nests and eating the eggs of ground nesting birds... such as the Skylark, the Meadow Pipit, and Reed Bunting”. Of jackdaws, they said that “we have been provided with ample examples from all around the country where Jackdaws have preyed on ground nesting birds and destroying them, their nests and eggs”.

NSA asked for carrion crow (wild birds, flora and fauna) and magpie (wild birds) to be included.

SS listed carrion crow, jay and magpie, for the purpose of conserving wild birds. On carrion crow, they pointed out that their population increase between 1970-2015 had shown them as being “close to an all-time high in England while the Farmland and Woodland Bird Indices have decreased, markedly, down by 56% and 29% respectively, over the same period”.

SS referred to research that has “shown that jays are one of the major predators of woodland-nesting song and other small birds”. Their own commissioned research showed “properly targeted corvid removal positively and significantly impacts local songbird populations”.

#### *Organisational proposals suggesting the removal of certain native species from the conservation licence*

The RSPB was not aware of consistent evidence that implicates the jackdaw, magpie or jay in the decline of other species and on the former quoted the Natural Resources Wales (NRW) review which concluded there is “low expert opinion and no anecdotal evidence to suggest jackdaw will have an impact on wild bird prey populations”.

In the case of the magpie, NRW had concluded that: “Analyses of large scale and extensive national monitoring data provide little evidence that magpies have driven UK-scale declines in songbird populations (Gooch et al 1991; Thompson et al 1998, Newson et al 2010).” In the case of the rook, RSPB noted that there was almost no evidence of conservation impacts, with both NRW and Scottish Natural Heritage (SNH) removing the species from their GLs as a result.

Songbird Survival said, “the evidence that rooks pose a significant threat to wild birds is unclear and may be offset by the beneficial impact they have upon agricultural pests such as leather-jackets, weevils etc”.

*Organisational proposals suggesting the addition of certain other native species to the conservation licence*

Table 16: Organisations (other than NFU and GWCT) which supported the addition of native species to the conservation general licence

Species	Sub-purpose	Organisations in favour of GL inclusion
<b>Raven</b>	all sub-purposes	NSA
	conserving wild birds	BASC
<b>Gulls</b>	conserving wild birds and fauna	TFA
<b>Cormorant</b>	conserving fauna	AT, WTT, CA
<b>Goosander</b>	conserving fauna	WTT

**Public Health and Public Safety**

*Organisational proposals suggesting the retention of certain native species on the public health and public safety general licence*

Table 17: Organisations (other than GWCT and NFU) which supported the retention of native species on the public health and public safety general licence

Species	Organisations in favour of GL inclusion
<b>Feral pigeon</b>	TFA; RSPB; CA; NPTA
<b>Carrion crow</b>	BASC; CA; TFA
<b>Jackdaw</b>	TFA; BASC; CA; NPTA
<b>Magpie</b>	BASC; CA; TFA
<b>Rook</b>	BASC; CA; TFA

RSPB agreed with NRW’s conclusion that this GL be restricted to feral pigeon, quoting NRW as follows: “Combating the spread of disease to humans is critically important. However, we do not believe the best way to approach this issue is using a General Licence, other than in relation to Feral pigeon where we consider that control is necessary to address a likely risk of disease transmission to humans (for example through the

contamination of human food). This means that the number of species which are covered by GL002 has been reduced to one species, namely Feral pigeon.”

BASC and CA both highlighted disease risk from corvids. BASC said: “Corvids are known to be carriers of a range of diseases that have to potential to cause harm to humans, either directly or through the consumption of contaminated food products. Corvids may also exacerbate issues through their presence in livestock areas, scavenging infected prey, and travelling wide distances (Daniels et al., 2003).

Avian influenza has been found in corvids and this poses a disease risk to livestock through direct and indirect contact (e.g. contamination of feed, water, bedding and equipment) which in turn could pose a risk to humans... There is also anecdotal evidence for corvids causing damage to human food stores, other businesses and also causing issues when nesting in chimneys.”

NPTA wanted jackdaw and feral pigeon on the GL for this purpose. They discussed nesting issues in relation to jackdaw They pointed to a range of health and safety issues related to feral pigeons across the different sub-purposes. They particularly highlighted issues when feral pigeons enter business premises: “These are obviously time critical situations and given the delay in receiving licences this does have the potential to cause a public health threat or result in significant economic loss.”

*Organisational proposals suggesting the removal of certain native species from the public health and public safety licence*

RSPB said there was insufficient evidence to support corvids being retained on the licence.

WJ considered that corvids should not be included on the GL for health and safety reasons, giving similar reasons for each species. For example: “DEFRA has no idea how many Carrion Crows have been killed, allegedly for this purpose. Our guess is very few and the onus is on DEFRA to provide the evidence for widespread, regular and common need not me to provide evidence from a current licensing system that collects no data. Any cases should be dealt with by application for specific licences to deal with specific issues at a specific site after non-lethal methods have been tested. Charging for making a licence application would be a perfectly reasonable response to land managers who wish to be licensed to carry out an otherwise unlawful action.”

*Organisational proposals suggesting the addition of certain other native species to the public health and public safety licence*

Table 18: Organisations (other than NFU and GWCT) which supported the addition of native species to the public health and public safety general licence

Species	Sub-purpose	Organisations in favour of GL inclusion
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<b>Gull species</b>	all sub-purposes	NPTA, TFA
<b>Jay</b>	spread of disease	BASC

## Serious Damage

*Organisational proposals suggesting the retention of certain native species on the serious damage general licence*

Table 19: Organisations (other than NFU and GWCT) which supported the retention of native species on the serious damage general licence

Species	Organisations in favour of GL inclusion
<b>Feral pigeon</b>	RSPB; CA; TFA
<b>Wood pigeon</b>	RSPB; TFA; CA; NSA
<b>Carrion crow</b>	BASC; CA; WJ; TFA; NSA; NPTA
<b>Magpie</b>	BASC; CA; TFA
<b>Jackdaw</b>	BASC; CA; TFA
<b>Rook</b>	BASC; CA; TFA; NSA; NPTA

RSPB said they had no issue with retaining feral pigeon or woodpigeon. On the latter, they highlighted that it is apparent that some proportion of woodpigeon shooting is solely recreational or is shooting for commercial sale of pigeon meat, neither of these being legally possible under the licence. They suggested that there needs to be further and stronger information relating to this on the licence itself or an associated guidance note.

BASC asked for carrion crow to be retained for livestock, crops, vegetables and feedstuffs. Magpie was proposed for livestock, crops, vegetables, fruit and feedstuffs. Jackdaw and rook were proposed for crops and feedstuffs.

CA made the case for all species to be retained. Woodpigeon was said to cause “£1-2 million worth of damage to cereal crops and in excess of £2 million worth of damage to brassicas, especially oil seed rape”.

NPTA wanted carrion crow and rook on the licence in relation to animal harm and crop damage.

TFA stated that carrion crow, jackdaw, magpie and rook should be included for livestock due to attacks on lambs. Rooks were also said to feed on barley crops, while woodpigeon and feral pigeon should be included for crops, vegetables, livestock feedstuff and fruit (woodpigeon only).

NSA wanted carrion crow retained as they cause “devastation in outdoor lambing flocks and cast sheep”.

WJ accepted that a general licence might be justified for carrion crow in relation to livestock (sheep) but stated that this should be strictly prescribed to prevent misuse. WJ said this must include specifying clearly the non-lethal methods that must be employed and frequent visiting of livestock should be a large part of that.

*Organisational proposals suggesting the removal of certain native species from the serious damage general licence*

RSPB made the same comments on all INNS species as for the other purposes. They said they were not aware of any evidence to support the inclusion of carrion crow, jackdaw, magpie or rook, saying that circumstances where they may cause serious damage would be best dealt with using individual licences.

WJ said: “We have accepted the need for appropriate but more constrained and targeted general licences to control attacks by Carrion Crows on livestock (above). These should not, as general licences, be available to protect non-native gamebirds in proper indoor rearing pens (specific licences could be applied for) and not at all to protect birds in release pens without roofs.

All wild birds are protected by law. DEFRA's job is to limit killing of all birds to those circumstances where there is serious damage to crops, livestock etc. and where non-lethal methods have been tried and failed. The starting point has to be that specific licences are an adequate way to deal with specific serious issues at specific sites.

The next stage up would be highly prescribed general licences, specific for particular problems, which indicate non-lethal measures needed and then limit the application of the general licence temporally and spatially. We understand that this is challenging but then, so it should be to limit casual killing of protected wildlife. Many of the categories in this list are laughably inappropriate (e.g. in this case fisheries and inland waters).

DEFRA needs to look carefully at the evidence brought forward for any need for a general licence that cannot be met by application of specific licences.”

*Organisational proposals suggesting the addition of certain other native species to the serious damage general licence*

Table 20: Organisations (other than NFU and GWCT) which supported the addition of native species to the serious damage general licence

Species	Sub-purpose	Organisations in favour of GL inclusion
<b>Cormorant</b>	protecting fisheries and inland waters	AT, WTT
<b>Goosander</b>	protecting fisheries and inland waters	WTT
<b>Gulls</b>	livestock	TFA
<b>Collared dove</b>	livestock feedstuffs	CA
<b>Raven</b>	livestock	NSA
<b>White-tailed sea eagle</b>	livestock	NSA

BASC raised a number of species – raven, goosander, cormorant, red-breasted merganser and stock dove – where they felt further research was needed to determine whether they should be added for this purpose.

## **Invasive non-native species (INNS) – all organisational responses**

### **Wider organisational responses on INNS inclusion on general licences**

The Born Free Foundation does not differentiate between native and non-native birds, saying: “The need for any control of wild birds should be considered utilising decision-making resources, such as the International Consensus Principles for Ethical Wildlife Control and where lethal control is deemed necessary it should be strictly limited and monitored by specific licence to allow only the minimum number of birds to be targeted in order to achieve the required outcome.”

The RSPB said for all the species concerned: “Whilst we have no objection to the lethal control of non-native [afore mentioned species], we are not convinced that any threats the species poses meet the legal tests that justify lethal control of the type provided by General Licences. Management is best done – where evidence indicates the need - as part of a strategic [invasive non-native species (INNS)] management policy, outwith the General Licence system.

The control of established and/or widespread INNS requires planned, strategic, coordinated and sustained action at the appropriate scale and over sufficient periods to

deliver sustained environmental and other benefits. If management measures are undertaken in an unplanned, sporadic, opportunistic or piecemeal way, and if sustained action is not secured, widespread species will in most cases simply re-invade the control areas, re-establish, and the funding and effort that went into the control will have been wasted in the longer term.

A haphazard or unplanned management approach, which would be the standard outcome of any approach based on General Licence listing, risks exposing the species concerned to repeated, ineffective management actions, with significant implications in terms of future ecological damage and costs.”

In contrast, BASC said for all these species: “The requirements of the Convention of Biological Diversity and successive supporting legislation emphasises the need for a precautionary approach towards non-native species, which means eradication is the preferred option should they arrive or if widely spread a management plan to mitigate their impacts if possible. This is even so when the science base indicates a level of risk but there is uncertainty of the significance of the impact in the home country. Therefore, we consider it is appropriate for them to be included on this general licence.”

The Countryside Alliance said for all these species (apart from Canada goose), that they are “a non-native species, with the potential to become invasive. While there is little direct study on the effects of this species, the Convention on Biological Diversity has mandated a precautionary principle approach to non-native species, suggesting eradication where possible and practicable.” Regarding Canada goose, their response did not mention eradication but considered that this species should continue to be controlled under general licence, reflecting the difficulty of successful eradication with regard to this species.

Not all NNS are currently listed on each relevant general licence (conservation, Health & Safety and prevention of serious damage). When respondents submitted their responses to the Citizen Space Survey,

### Conservation purpose

*Organisational proposals suggesting the retention of certain invasive non-native species on the conservation licence*

Table 21: Organisations (including GWCT and NFU) which supported the retention of certain invasive non-native species on the conservation general licence

Species	Organisation
Canada goose	CA; NFU; GWCT; BASC; AT
Egyptian goose	CA; GWCT; BASC
Indian House Crow	CA; BASC; TFA; SS

<b>Monk Parakeet</b>	CA; BASC
<b>Ring necked parakeet</b>	CA; BASC; SS
<b>Sacred Ibis</b>	CA; BASC; SS

The NFU proposed that the following species should be on the GL for this purpose – Canada goose to conserve flora (20%);

The GWCT called for Canada goose and Egyptian goose, to be retained for this purpose. Both Canada goose and Egyptian goose were said to be aggressive towards native species and to compete for nest sites. Nearly all respondents to their survey said they had witnessed the damage described.

BASC asked for the retention of, Indian house crow, Canada goose, monk parakeet, ring necked parakeet, and sacred ibis.

The CA suggested that the following species should be retained: Indian House Crow, Canada goose, Egyptian goose, monk parakeet, ring-necked parakeet, and sacred ibis.

Both BASC and the CA stated that it was necessary to control invasive non-native species (INNS) following the precautionary principle INNS were mentioned in the context of being necessary to control following the precautionary principle.

The TFA made the case for retaining Indian House Crow, conserving wild birds and fauna. They stated they had “numerous examples of a lot of farmers up and down the country who frequently witness these species destroying the nests and eating the eggs of ground nesting birds... such as the Skylark, the Meadow Pipit, and Reed Bunting.” This was also said for carrion crow and as there are currently no resident Indian House Crows it is likely that the organisation treated both species as one.

The AT asked for the retention of Canada goose (conserving fauna) as they “pose a significant threat to the health of water bodies and the wildlife they contain through the toxicity of their excrement which is deposited in large quantities at the water’s edge.”

Songbird Survival listed, Indian house crow, ring necked parakeet and sacred ibis for the purpose of conserving wild birds. On Indian House Crow they pointed to a need to eradicate early because “as is well known and widely accepted, acting too late with invasive species is always a very bad idea and much more expensive to resolve on the long-term.” The Ring-Necked Parakeet’s aggressive behaviour around feeding stations and its competition for nest holes and cavities was noted.

SS listed Indian house crow, ring-necked parakeet and sacred ibis for the purpose of conserving wild birds. On Indian house crow, they pointed to a need to eradicate early because “as is well known and widely accepted, acting too late with invasive species is



always a very bad idea and much more expensive to resolve on the long-term”. The ring-necked parakeet’s aggressive behaviour around feeding stations and its competition with native birds for nest holes and cavities were noted.

*Organisational proposals suggesting the removal of certain invasive non-native species from the conservation licence*

The RSPB suggested all INNS should be removed from the GLs – ‘our view is that management is best done where evidence indicates the need as part of a strategic INNS management policy, out with the General Licence system.’ Whilst they did not object to the Canada goose on the GL, saying that the disease risk may be slightly higher given that many individuals are relatively tame and inhabit public open spaces such as parks, they suggested that management was better done by targeted and funded projects.

Songbird Survival proposed monk parakeet for removal stating there is “no evidence that monk parakeets pose a significant threat to wild birds.”

*Organisational proposals suggesting the addition of certain other invasive non-native species to the conservation licence*

Table 22: Organisations (including GWCT and NFU) which supported the addition of certain invasive non-native species to the conservation general licence

Species	Sub-purpose	Organisations in favour of GL inclusion
<b>Ruddy duck</b>	conserving wild birds	BASC

**Public Health and Public Safety purpose**

*Organisational proposals suggesting the retention of certain invasive non-native species on the public health and public safety general licence*

Table 23: Organisations (including GWCT and NFU) supported the retention of certain invasive non-native species on the public health and public safety general licence

Species	Organisation
<b>Canada goose</b>	AT; NFU; BASC; CA; PCTA; NPTA; GWCT
<b>Monk parakeet</b>	NFU; CA; PCTA; NPTA
<b>Indian House Crow</b>	PCTA

The RSPB agreed with NRW’s conclusion that this GL be restricted to feral pigeon.

The NFU asked for Canada goose and monk parakeet, to be retained for this purpose.

BASC asked to retain Canada goose. They pointed to the conclusions of the GB NNS secretariat that Canada goose is a potential vector for avian and human pathogens including the avian flu virus but there is no confirmed evidence of transmission to humans as well as clear evidence of agricultural damage, nuisance and defecation in parkland and risks to flight safety.

The Countryside Alliance asked for Canada goose and monk parakeet to be retained. Canada goose was said to defecate public sites.

The PCTA wanted Indian House Crow, monk parakeet and Canada Goose retained. Comments in support of Canada goose echoed that of others.

NPTA wanted monk parakeet and Canada goose on the GL for this purpose. They discussed nesting issues in relation to monk parakeet, and Canada goose damage related to fouling grassland in amenity areas. “These are obviously time critical situations and given the delay in receiving licences this does have the potential to cause a public health threat or result in significant economic loss.”

The AT wanted Canada goose retained.

*Organisational proposals suggesting the removal of certain invasive non-native species from the public health and public safety general licence*

The RSPB said that whilst they did not object to the Canada goose being on the GL (saying that the disease risk may be slightly higher given that many individuals are relatively tame and inhabit public open spaces such as parks), they suggested management was better achieved by targeted and funded projects. As with the conservation purpose their view was that for monk parakeet, management should be part of a strategic plan and outwith the General Licence system.

*Organisational proposals suggesting the addition of certain other invasive non-native species to the public health and public safety general licence*

Table 24: Organisations (including GWCT and NFU) which supported the addition of certain invasive non-native species on the public health and public safety general licence

Species	Sub-purpose	Organisations in favour of GL inclusion
<b>Indian house crow</b>	spread of disease	BASC
<b>Ring-necked parakeet</b>	spread of disease	BASC

## Serious Damage purpose – all organisations

*Organisational proposals suggesting the retention of certain invasive non-native species on the serious damage general licence*

Table 25: Which organisations (including GWCT and NFU) supported the retention of certain invasive non-native species on the serious damage general licence

Species	Organisation
Canada goose	NFU; GWCT; CA; AT
Egyptian goose	GWCT; CA
Monk parakeet	CA
Ring necked parakeet	CA

The NFU said that Canada Geese “arrive in large numbers, decimate crops and grassland with feet and graze arable crops.”

The GWCT asked for Canada goose and Egyptian goose, to be retained for this purpose. Almost all respondents said they had witnessed the damage described. One respondent said of Canada geese that they are “big birds and 100 of them can wipe a whole crop out in a week.”

The Countryside Alliance made the case for Canada goose, Egyptian geese, monk parakeet, ring-necked parakeet.

The AT wanted Canada goose for protecting fisheries because of the “high phosphorous content of their faeces can lead to significant algae blooms which can kill fish and damage invertebrates.”

*Organisational proposals suggesting the removal of certain invasive non-native species from the serious damage general licence*

The RSPB made the same comments on all INNS species as for the other purposes – those include Canada goose, Egyptian goose, monk parakeet and ring-necked parakeet.

*Organisational proposals suggesting the addition of certain other invasive non-native species to the serious damage general licence*

No proposals were received.

## **Alternative measures – all organisations**

Responses revealed that a range of non-lethal alternative methods were carried out by users to resolve issues, with varying degrees of success. NFU said that 94.6% of respondents to its survey used alternatives to lethal control. RSPB mentioned trials using laser hazing at their sites for predator control including crows, but the results were not yet finalised, although general observations show that results were variable. They also mentioned habitat management in the form of careful management/removal of trees and scrub in key locations. TFA pointed out that various non-lethal methods only worked if they were regularly interspersed with shooting as otherwise birds learn that it is safe to return.

This habituation issue was echoed by BASC: “Lethal control, through shooting, is an essential part of an overall control strategy and helps to reinforce the effectiveness of non-lethal methods by providing a degree of threat to the birds.” This view was supported by the NFU. BASC went on to say: “For a number of situations there is simply no effective alternative to lethal control. For example, visual, auditory and chemical deterrents could not be used to prevent corvid predation on threatened bird species as the deterrents are likely to scare away the protected bird as they are to scare the corvids.”

## **Record keeping – all organisations**

The extent of record keeping varied between type of organisation.

Environmental and welfare groups said that record keeping, and reporting were essential.

RSPB said that they collect detailed records of every vertebrate they kill or take for these purposes. For each visit they record the species controlled, date of visit, time of visit, action taken, number killed, and the method used. A paper form for each site is completed and then transposed into electronic form at the end of each control day. This process was said to take approximately five minutes each day. NPTA reported similarly that its members were used to recording their actions and justifying their decisions in writing.

NFU reported from their survey that 20% of respondents recorded their actions. BASC said that record keeping would be costly and incomplete.

## **Other issues – all organisations**

A number of organisations did not propose species to be included within GLs or wanted more restrictions placed on their use. Those organisations included WJ, AA, WAWC and BFF. For all species and every purpose, BFF stated: “General Licences have no place in controlling wild birds for [the relevant purpose]. The need for any control of wild birds should be considered utilising decision-making resources, such as the International Consensus Principles for Ethical Wildlife Control and where lethal control is deemed necessary it should be strictly limited and monitored by specific licence to allow only the minimum number of birds to be targeted in order to achieve the required outcome.”

RSPCA stated that “the default position for all should be avoidance of lethal control, with licences issued only in exceptional circumstances, after all appropriate non-lethal methods have been implemented and shown to fail”. AA said they oppose all lethal methods of control including for conservation purposes. They mentioned a lack of evidence of impacts for all INNS.

RSPB raised a number of recommendations for the future development of the general and class licensing system in England. These included regular review of the species listed including their conservation status; a mandatory means of monitoring the levels and methods by which birds are killed; a full review of the terms, conditions and guidance notes included on the GLs; and a review of cage traps, including an examination of their legality under the Birds Directive, and the terms and conditions pertaining to their use, to help prevent illegal or misinformed activity.

Some organisations raised concerns about the inability of users to identify specific species. WAWC raised concerns including around the lack of assurance that birds shot are rendered immediately and irreversibly unconscious. There were calls for conditions around shooter competence, welfare considerations around traps and dealing with wounded birds. Environmental and welfare organisations were in support of tagging of traps.

WJ raised the issue of enforcement of GL activity: “what steps does DEFRA intend to take to enforce the application of any general licences? Moving much of the authorisation of lethal killing to a specific licensing system by postal application would reduce the need for this.”

Environmental groups were concerned around recreational shooting with AA saying: “we urge Defra to address this issue and ensure that shooting for sport is not being undertaken by the shooting industry under a pretext of controlling bird species under this general licence regime.”

The Wildlife Trusts were concerned about the increasing practice of buzzard control and licensing by Natural England as a result of intensive pheasant shoots. They would be especially concerned if any of the existing GLs for wild birds were extended to include the control of raptors. Amongst the principles they said should be followed included an assessment of the impact of the target species on the ecosystem, and on species or habitats of conservation importance, and having a convincing case that controlling the target species will address the conservation issue that has been identified.

Organisations representing users called for simplification. SS said that “a light-touch, laissez-faire, regulatory regime should continue to be employed, allowing land managers to carry out necessary control measures on the land they know best, and without placing unnecessary bureaucratic burden or obstacles in their way”.

NFU pointed to issues around inconsistencies in licence drafting, ambiguity in interpretation and lack of clarity between what is legally required and what is guidance and

advice. BASC suggested it would be beneficial for users to see the new GLs two months before they come into force and if possible, for them to last for two years.

BASC said that they wanted to work with Defra to develop habitat specific GLs that can be applied generically to protected sites. They were against the 300m buffer zone which has been applied in the interim GLs, which they say blocks efforts to prevent serious damage. Furthermore, they wanted more permitted methods e.g. use of sound recordings and more widely permitted use of illuminating devices or sights for night shooting and artificial lighting.

## **Annexes**

See separate documents

### **Annex 1 – ‘Review of the evidence base for inclusion of avian species on General Licences GL34, GL35 and GL36 in England’**

The review built on the existing reference database and methodology established by the British Trust for Ornithology (BTO) as part of their evaluation of the scientific evidence base for inclusion of bird species listed on general licences in Scotland.

The existing BTO database was expanded to encompass scientific literature from a number of other existing sources - previous reviews undertaken by Defra and Natural England and scientific literature cited by stakeholders in their responses to a stakeholder survey of General Licences.

### **Annex 2 - Review of alternative non-lethal methods for mitigating damage by avian species listed under General Licences GL34-36 in England**

A review of published and grey literature relating to bird management was undertaken in order to evaluate the availability of non-lethal measures to mitigate the detrimental impacts of avian species listed under General Licences GL34-36.

The current review built-on a previous extensive systematic review of avian management undertaken by the Animal and Plant Health Agency (then the Central Science laboratory) (Bishop et al. 2003), using the same methodology, focussing on developments during the intervening period.

## **Annex 3 – Defra’s policy considerations including species purpose combination assessments**

These set out Defra’s consideration of the scientific and experiential evidence including the use of the framework of tests. These tests are used to consider individual species for each of the three licence themes: conservation; public health & safety; and serious damage.

This document also sets out Defra’s policy considerations regarding other key elements of the review, including European protected sites, welfare of controlled birds and enforcement.