

DAERA/Northern Ireland Environment Agency Wild Bird Licence Consultation

Comments by

Northern Ireland Environment Link

21st July 2022

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland. Its 63 Full Members represent 190,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members. However, the Ulster Angling Federation (UAF) does not support this submission and so this submission should not be taken as representing the view of the UAF. NIEL understands that the UAF has made its own submission in relation to this consultation. Some other members may be providing independent comments as well. If you would like to discuss these comments further, we would be happy to do so.

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General Licence TPG1

6 Do you agree that Hooded Crow should be included on TPG1?

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly advocate for the removal of hooded crow, carrion crow, great black-backed gull, herring gull, lesser black-backed gull, jackdaw, magpie, woodpigeon, rook, house sparrow and starling from TPG1 for the reasons below.

We don't believe GLs are the best way to approach the spread of disease, other than for Feral pigeon where control may be necessary to address a likely risk of disease transmission to humans (for example through the contamination of human food).

Many of these species are of conservation concern and shouldn't be on the GLs (herring gull is red-listed on UK Birds of Conservation Concern (BoCC) and great and lesser black-backed are amber listed, herring gull and lesser black-backed are amber-listed on Irish BoCC) and/or lack of supporting evidence for inclusion. Both starling and house sparrow are listed on NIEA's NI Priority Species list – both are red-listed on UK BoCC and amber-listed on IBoCC.

All the species listed on TPG1, except for feral pigeon, have already been removed from the equivalent licence in the other three UK countries.

7 Do you agree that Carrion Crow should be included on TPG1?

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly advocate for the removal of hooded crow, carrion crow, great black-backed gull, herring gull, lesser black-backed gull, jackdaw, magpie, woodpigeon, rook, house sparrow and starling from TPG1 for the reasons below.

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All the species listed on TPG1, except for feral pigeon, have already been removed from the equivalent licence in the other three UK countries.

8 Do you agree that Great Black-backed Gull should be included on TPG1?

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly advocate for the removal of hooded crow, carrion crow, great black-backed gull, herring gull, lesser black-backed gull, jackdaw, magpie, woodpigeon, rook, house sparrow and starling from TPG1 for the reasons below.

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All the species listed on TPG1, except for feral pigeon, have already been removed from the equivalent licence in the other three UK countries.

9 Do you agree that Lesser Black-backed Gull should be included on TPG1?

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly advocate for the removal of hooded crow, carrion crow, great black-backed gull, herring gull, lesser black-backed gull, jackdaw, magpie, woodpigeon, rook, house sparrow and starling from TPG1 for the reasons below.

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All the species listed on TPG1, except for feral pigeon, have already been removed from the equivalent licence in the other three UK countries.

10 Do you agree that Herring Gull should be included on TPG1

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly advocate for the removal of hooded crow, carrion crow, great black-backed gull, herring gull, lesser black-backed gull, jackdaw, magpie, woodpigeon, rook, house sparrow and starling from TPG1 for the reasons below.

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All the species listed on TPG1, except for feral pigeon, have already been removed from the equivalent licence in the other three UK countries.

11 Do you agree that Jackdaw should be included on TPG1?

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly advocate for the removal of hooded crow, carrion crow, great black-backed gull, herring gull, lesser black-backed gull, jackdaw, magpie, woodpigeon, rook, house sparrow and starling from TPG1 for the reasons below.

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All the species listed on TPG1, except for feral pigeon, have already been removed from the equivalent licence in the other three UK countries.

12 Do you agree that Magpie should be included on TPG1?

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly advocate for the removal of hooded crow, carrion crow, great black-backed gull, herring gull, lesser black-backed gull, jackdaw, magpie, woodpigeon, rook, house sparrow and starling from TPG1 for the reasons below.

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lack of supporting evidence for inclusion. Both starling and house sparrow are listed on NIEA's NI Priority Species list – both are red-listed on UK BoCC and amber-listed on IBoCC.

All the species listed on TPG1, except for feral pigeon, have already been removed from the equivalent licence in the other three UK countries.

13 Do you agree that Feral Pigeon should be included on TPG1?

Yes.

Where possible please provide reasons and/or evidence to support your view:

We have no issue with feral pigeon remaining on TPG1 but think it would be better controlled under individual licence.

14 Do you agree that Woodpigeon should be included on TPG1?

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly advocate for the removal of hooded crow, carrion crow, great black-backed gull, herring gull, lesser black-backed gull, jackdaw, magpie, woodpigeon, rook, house sparrow and starling from TPG1 for the reasons below.

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All the species listed on TPG1, except for feral pigeon, have already been removed from the equivalent licence in the other three UK countries.

15 Do you agree that Rook should be included on TPG1?

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly advocate for the removal of hooded crow, carrion crow, great black-backed gull, herring gull, lesser black-backed gull, jackdaw, magpie, woodpigeon, rook, house sparrow and starling from TPG1 for the reasons below.

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All the species listed on TPG1, except for feral pigeon, have already been removed from the equivalent licence in the other three UK countries.

16 Do you agree that House Sparrow should be included on TPG1?

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly advocate for the removal of hooded crow, carrion crow, great black-backed gull, herring gull, lesser black-backed gull, jackdaw, magpie, woodpigeon, rook, house sparrow and starling from TPG1 for the reasons below.

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All the species listed on TPG1, except for feral pigeon, have already been removed from the equivalent licence in the other three UK countries.

17 Do you agree that Starling should be included on TPG1?

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly advocate for the removal of hooded crow, carrion crow, great black-backed gull, herring gull, lesser black-backed gull, jackdaw, magpie, woodpigeon, rook, house sparrow and starling from TPG1 for the reasons below.

We don't believe GLs are the best way to approach the spread of disease, other than for Feral pigeon where control may be necessary to address a likely risk of disease transmission to humans (for example through the contamination of human food).

Many of these species are of conservation concern and shouldn't be on the GLs (herring gull is red-listed on UK Birds of Conservation Concern and great and lesser black-backed are amber listed, herring gull and lesser black-backed are amber-listed on Irish BoCC) and/or lack of supporting evidence for inclusion. Both starling and house sparrow are listed on NIEA's NI Priority Species list – both are red-listed on UK BoCC and amber-listed on IBoCC.

All the species listed on TPG1, except for feral pigeon, have already been removed from the equivalent licence in the other three UK countries.

General Licence TPG2

18 Do you agree that Hooded Crow should be included on TPG2?

No

Where possible please provide reasons and/or evidence to support your view:

A review of the evidence base for species listed on the General Licences in Scotland found “little or no evidence” that magpie, carrion crow or jackdaw “are likely to result in serious damage to livestock or agriculture” (Newson et al, 2019).

We strongly request that hooded crow, carrion crow, jackdaw and magpie be removed from TPG2 on the basis that (for spread of disease) any local, demonstrable impact could be controlled through specific licence, and (in preventing serious damage to livestock, foodstuffs etc) there is “little or no evidence”.

19 Do you agree that Carrion Crow should be included on TPG2?

No.

Where possible please provide reasons and/or evidence to support your view:

A review of the evidence base for species listed on the General Licences in Scotland found “little or no evidence” that magpie, carrion crow or jackdaw “are likely to result in serious damage to livestock or agriculture” (Newson et al, 2019).

We strongly request that hooded crow, carrion crow, jackdaw and magpie be removed from TPG2 on the basis that (for spread of disease) any local, demonstrable impact could be controlled through specific licence, and (in preventing serious damage to livestock, foodstuffs etc) there is “little or no evidence”.

20 Do you agree that Great Black-backed Gull should be included on TPG2?

No.

Where possible please provide reasons and/or evidence to support your view:

We would ask for the removal of great black-backed, herring gull and lesser black-backed from TPG2 due to their poor conservation status (herring gull is red listed on UK Birds of Conservation Concern and lesser and great black-backed are amber listed, and herring and lesser black-backed are amber-listed on Irish Birds of Conservation Concern) and lack of evidence for licence inclusion.

21 Do you agree that Lesser Black-backed Gull should be included on TPG2?

No.

Where possible please provide reasons and/or evidence to support your view:

We would ask for the removal of great black-backed, herring gull and lesser black-backed from TPG2 due to their poor conservation status (herring gull is red listed on UK Birds of Conservation Concern and lesser and great black-backed are amber listed, and herring and lesser black-backed are amber-listed on Irish Birds of Conservation Concern) and lack of evidence for licence inclusion.

22 Do you agree that Herring Gull should be included on TPG2?

No.

Where possible please provide reasons and/or evidence to support your view:

We would ask for the removal of great black-backed, herring gull and lesser black-backed from TPG2 due to their poor conservation status (herring gull is red listed on UK Birds of Conservation Concern and lesser and great black-backed are amber listed, and herring and lesser black-backed are amber-listed on Irish Birds of Conservation Concern) and lack of evidence for licence inclusion.

23 Do you agree that Jackdaw should be included on TPG2?

No.

Where possible please provide reasons and/or evidence to support your view:

A review of the evidence base for species listed on the General Licences in Scotland found “little or no evidence” that magpie, carrion crow or jackdaw “are likely to result in serious damage to livestock or agriculture” (Newson et al, 2019).

We strongly request that hooded crow, carrion crow, jackdaw and magpie be removed from TPG2 on the basis that (for spread of disease) any local, demonstrable impact could be controlled through specific licence, and (in preventing serious damage to livestock, foodstuffs etc) there is “little or no evidence”.

24 Do you agree that Magpie should be included on TPG2?

No.

Where possible please provide reasons and/or evidence to support your view:

A review of the evidence base for species listed on the General Licences in Scotland found “little or no evidence” that magpie, carrion crow or jackdaw “are likely to result in serious damage to livestock or agriculture” (Newson et al, 2019).

We strongly request that hooded crow, carrion crow, jackdaw and magpie be removed from TPG2 on the basis that (for spread of disease) any local, demonstrable impact could be controlled through specific licence, and (in preventing serious damage to livestock, foodstuffs etc) there is “little or no evidence”.

25 Do you agree that Feral Pigeon should be included on TPG2?

Yes.

Where possible please provide reasons and/or evidence to support your view:

We have no objection to feral pigeon remaining on TPG2 but think it would be better controlled under individual licence.

26 Do you agree that Woodpigeon should be included on TPG2?

Yes.

Where possible please provide reasons and/or evidence to support your view:

We have no objection to woodpigeon remaining on TPG2 but think it would be better controlled under individual licence.

27 Do you agree that Rook should be included on TPG2?

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly request that rook be removed from TPG2 on the basis of its declining conservation status (amber-listed on UK Birds of Conservation Concern and a BBS trend of -16% in NI during 1995-2020, Harris et al. 2021) and that (for spread of disease) any local, demonstrable impact could be controlled through specific licence, and (in preventing serious damage to livestock, foodstuffs etc) there is lack of evidence for licence inclusion.

28 Do you agree that House Sparrow should be included on TPG2?

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly request that house sparrow and starling be removed from TPG2 on the basis of their conservation status (On NIEA's NI Priority Species list and both red-listed on UK Birds of Conservation Concern and amber-listed on Irish Birds of Conservation Concern) and that (for spread of disease) any local, demonstrable impact could be controlled through specific licence, and (in preventing serious damage to livestock, foodstuffs etc) there is lack of evidence for licence inclusion and both species were removed from the GLs of the other UK countries decades ago.

29 Do you agree that Starling should be included on TPG2?

No.

Where possible please provide reasons and/or evidence to support your view:

We strongly request that house sparrow and starling be removed from TPG2 on the basis of their conservation status (on NIEA's NI Priority Species list and both red-listed on UK Birds of Conservation Concern and amber-listed on Irish Birds of Conservation Concern) and that (for spread of disease) any local, demonstrable impact could be controlled through specific licence, and (in preventing serious damage to livestock, foodstuffs etc) there is lack of evidence for licence inclusion and both species were removed from the GLs of the other UK countries decades ago.

General Licence TPG3

30 Do you agree that Hooded Crow should be included on TPG3?

Yes.

Where possible please provide reasons and/or evidence to support your view:

Hooded crow/Carrion crow – this is the one species of corvid for which there is good evidence available of a negative effect on nesting productivity of some prey species. In NI, this is the case, primarily, for ground-nesting birds, such as waders (such as lapwing, curlew and redshank).

We request that crow (Hooded/Carrion) is retained on TPG3, but can only be killed/taken for the benefit of species of conservation concern for which there is evidence of impact on their conservation status ahead of and during the breeding season.

31 Do you agree that Carrion Crow should be included on TPG3?

Yes.

Where possible please provide reasons and/or evidence to support your view:

Hooded crow/Carrion crow – this is the one species of corvid for which there is good evidence available of a negative effect on nesting productivity of some prey species. In NI, this is the case, primarily, for ground-nesting birds, such as waders (such as lapwing, curlew and redshank). We request that crow (Hooded/Carrion) is retained on TPG3, but can only be killed/taken for the benefit of species of conservation concern for which there is evidence of impact on their conservation status ahead of and during the breeding season.

32 Do you agree that Great Black-backed Gull should be included on TPG3?

No.

Where possible please provide reasons and/or evidence to support your view:

We advocate for the removal of great and lesser black-backed gull from this licence (TPG3) due to their conservation status (Great - amber-listed on UK Birds of Conservation Concern, lesser – amber listed on UK and Irish Birds of Conservation Concern) and lack of evidence for widespread impact. Any local, demonstrable impact could be managed under a specific licence.

33 Do you agree that Lesser Black-backed Gull should be included on TPG3?

No.

Where possible please provide reasons and/or evidence to support your view:

We advocate for the removal of great and lesser black-backed gull from this licence (TPG3) due to their conservation status (Great - amber-listed on UK Birds of Conservation Concern, lesser – amber listed on UK and Irish Birds of Conservation Concern) AND lack of evidence

for widespread impact. Any local, demonstrable impact could be managed under a specific licence.

34 Do you agree that Jackdaw should be included on TPG3?

No.

Where possible please provide reasons and/or evidence to support your view:

We advocate for the removal of jackdaw and magpie from TPG3 due to lack of evidence of impact. Any local, demonstrable impact could be managed under a specific licence.

35 Do you agree that Magpie should be included on TPG3?

No.

Where possible please provide reasons and/or evidence to support your view:

We advocate for the removal of jackdaw and magpie from TPG3 due to lack of evidence of impact. Any local, demonstrable impact could be managed under a specific licence.

36 Do you agree that Feral Pigeon should be included on TPG3?

No.

Where possible please provide reasons and/or evidence to support your view:

We advocate for the removal of feral pigeon and woodpigeon from TPG3 due to no evidence for inclusion on the licence.

37 Do you agree that Woodpigeon should be included on TPG3?

No.

Where possible please provide reasons and/or evidence to support your view:

We advocate for the removal of feral pigeon and woodpigeon from TPG3 due to no evidence for inclusion on the licence.

38 Do you agree that Rook should be included on TPG3?

No.

Where possible please provide reasons and/or evidence to support your view:

We advocate for the removal of rook from TPG3 due to its declining conservation status (amber listed species on UK BoCC, BBS trend of -16% in NI during 1995-2020, Harris et al. 2021) and no evidence of impact.

Other Alternatives

39 Do you have any knowledge or experience of alternative measures to killing or taking wild birds to achieve the purposes of the three general licences set out above?

Please include details below:

40 Please set out the species, alternative measures employed, and your experience or any other evidence of how effective those measures were at achieving the purpose for which they were employed.

Please include details below:

41 Do you consider, in respect of any species and under any of the general licences above, that someone should only be able to take action under the licence if they have used reasonable endeavours to achieve the same purpose by alternative non-lethal methods? Do you think such a condition would cause any problems for those taking action under the licence?

Yes.

Where possible please provide reasons and/or evidence to support your view:

This is already a legal requirement as set out in the Birds Directive, which is brought into NI law through the Wildlife Order. This condition should not cause any problems as it is already a legal requirement and should be being carried out as part of adhering to the GL.

Designated Sites

42 Do you consider general licences should be available for use on protected sites?*

Protected sites are defined in the Overview section.

No.

Where possible please provide reasons and/or evidence to support your view:

We do not agree that general licences should be available for use on protected sites. We strongly advocate that the NI Environment Agency/DAERA requires a specific licence, rather than a general licence in all SPAs, and ASSIs that are designated for birds, and SACs where birds are supporting features, and includes this in GLs TPG 1 to TPG3.

43 Have you found it necessary to control birds under the general licences on protected sites?

No.

Where possible please provide reasons and/or evidence to support your view:

Additional Information

44 Are there any other conditions or limitations on the licences which DAERA should consider?

Please include details below:

No

45 Please use this space to provide any additional comments or information relevant to General Licences for wild birds.

Please include details below:

This submission reflects the consensus of NIEL members. However, the Ulster Angling Federation (UAF) does not support this submission and so this submission should not be taken as representing the view of the UAF. NIEL understands that the UAF has made its own submission in relation to this consultation.