

2019 General Licensing consultation

RESPONDENT INFORMATION

Name / Organisation Name
Wild Animal Welfare Committee
Email
wildanimalwelfarecommittee@gmail.com
Please provide the first half of your postcode (i.e IV2)
EH7
What is your interest in?
Animal Welfare
Stakeholder organisation - who do you represent? Wild Animal Welfare Committee
How do you wish your response to be treated?
Publish response with name.

Consultation structure

We are looking for detailed feedback in regard to questions we have on General Licences 1-3. We are also providing a space for those who just want to make general comments about our Licences.
I want to provide detailed feedback on certain general licences.

General Licences - Detailed feedback section

Which of our General Licences would you like to provide more feedback on?
GL1 - To kill or take certain birds for the conservation of wild birds.
GL2 - To kill or take certain birds for the prevention of serious damage to livestock, foodstuffs for livestock, crops, vegetables and fruit.
GL3 - To kill or take certain birds for the preservation of public health, public safety and preventing the spread of disease.

General Licence 1

Q2. What evidence do you have that the following species impact on the conservation status of wild birds as listed in this General Licence? You can upload supporting information at the bottom of this page.

	Comments
Great black-backed gull (<i>Larus marinus</i>)	WAWC is concerned with the welfare of birds covered by the General Licences. Our contribution will therefore concentrate on the welfare issues. This applies to ALL the species listed. See our response to Question 12.
Ruddy duck (<i>Oxyura jamaicensis</i>)	-
Carrion crow (<i>Corvus corone</i>)	-
Hooded crow (<i>Corvus cornix</i>)	-
Jackdaw (<i>Corvus monedula</i>)	-
Jay (<i>Garrulus glandarius</i>)	-
Magpie (<i>Pica pica</i>)	-
Rook (<i>Corvus frugilegus</i>)	-
Canada goose (<i>Branta canadensis</i>)	-

You can upload additional information or links to further references here.

- File: GLs -Shooting and Trapping evidence review.pdf

Would you also like to comment on General Licence 2 or 3?

Yes

General Licence 2

What evidence do you have that the following species impact on the interests listed in this General Licence? You can upload supporting information at the bottom of this page.

Comments	
Great black-backed gull (Larus marinus)	WAWC is concerned with the welfare of birds covered by the General Licences. Our contribution will therefore concentrate on the welfare issues. This applies to ALL the species listed. See our response to Question 12.
Collared dove (Streptopelia decaocto)	-
Feral pigeon (Columba livia)	-
Woodpigeon (Columba palumbus)	-
Carrion crow (Corvus	-
Comments	
corone)	
Hooded crow (Corvus cornix)	-
Jackdaw (Corvus monedula)	-
Magpie (Pica pica)	-
Rook (Corvus frugilegus)	-
Canada goose (Branta canadensis)	-
Resident greylag goose (Anser anser)	-

Would you also like to comment on General Licence 3?

Yes

General Licence 3

What evidence do you have that the following species impact on the interests listed in this General Licence? You can upload supporting information at the bottom of this page.

Comments	
Great black-backed gull (Larus marinus)	WAWC is concerned with the welfare of birds covered by the General Licences. Our contribution will therefore concentrate on the welfare issues. This applies to ALL the species listed. See our response to Question 12.
Herring gull (Larus argentatus)	-
Lesser black-backed gull (Larus fuscus)	-
Collared dove (Streptopelia decaocto)	-
Comments	
Feral pigeon (Columba livia)	-
Woodpigeon (Columba palumbus)	-
Carrion crow (Corvus corone)	-
Hooded crow (Corvus cornix)	-
Jackdaw (Corvus monedula)	-
Magpie (Pica pica)	-
Rook (Corvus frugilegus)	-
Canada goose (Branta canadensis)	-

GENERAL COMMENTS

Do you have any comments/further comments to make on General Licensing in Scotland?

WAWC is concerned with the welfare of birds covered by the General Licences (GL). WAWC believes that the repeated killing of the same species in the same location, year after year, is neither ethical nor sustainable. WAWC advocates applying an ethical framework to any decisions governing intervention against wildlife particularly when lethal intervention is under consideration. This would ensure that welfare considerations are central to the formulation of future GLs.

Our review (attached) shows that:

1. There is little or no evidence that the welfare of birds trapped under the cover of GLs is protected. This is because:

- a. Traps authorised to be used under the cover of the GLs are not type or individually approved. Many are home made.
- b. The design and operation of Larsen and similar traps does not take account of the behavioural needs of the main species that are used as decoys or of the target species (primarily corvids). As the WAWC review shows, corvids are highly intelligent birds and their close confinement in Larsen traps, and the handling and forced containment with other birds in larger crow cage traps, is likely to be highly stressful.
- c. There is no requirement to avoid trapping and killing birds during the breeding seasons of the listed species meaning that dependent young either in the nest or as recent fledglings will starve to death.
- d. Although (in Scotland only) there is a requirement for the central registration of the traps with the police, there is no requirement for recording and reporting of birds trapped and killed. This means that

official monitoring or public scrutiny of the operation of traps in Scotland is, in practice, impossible.

2. There is little or no evidence that the welfare of birds shot under the cover of GLs has been assessed, nor considered. This is because:

- a. There are no data on whether shooting allowed for by the GLs is humane (in this context 'humane' means that shooting causes rapid and irreversible loss of consciousness in the target animal). The lack of reporting and official monitoring of even a sample of the birds shot precludes any assessment of animal welfare. There are limited data from North America and continental Europe but these are primarily concerned with the efficiency of shot type and not animal welfare.
- b. Shooters neither have to be registered nor to demonstrate competence in shooting or the humane dispatch of wounded birds.
- c. There are no conditions specifying the type of weapon or ammunition used for a particular species, nor any requirement for a maximum distance at which birds may be shot. Evidence from WAWC's review indicates that using a specified type of ammunition and setting a maximum distance reduces the proportion of wounding.
- d. There is no requirement to ensure that wounded birds are picked up and dispatched humanely.
- e. There is no requirement for the reporting and recording of birds shot and that precludes any effective official monitoring of the compliance with licence requirements. This applies particularly to the humane dispatch of wounded birds.
- f. There is no requirement to avoid shooting birds or using other lethal interventions during the breeding seasons of the listed species meaning that dependent young either in the nest or as recent fledglings will starve to death.

To address these concerns and those raised in earlier questions, WAWC recommends the following:

1. Although WAWC accepts that, in limited circumstances, there may be no satisfactory solution other than lethal control it should be as a last resort. However, it must be the responsibility of the landowner or his/her agent to demonstrate that all of the alternatives to lethal control on the land to which the licence is to be applied have been tried and failed. Records of the efforts must be kept and made available for official inspection. Then and only then should lethal control be authorised.
2. Birds must not be shot and trapped during the breeding season of the species concerned and at other times when there is a risk of leaving dependent young to starve.
3. Shooters must be able to demonstrate competence in humane shooting of birds. Competence must be verified by a third party.
4. Weapons and ammunition used must be of an appropriate type for the species and a maximum shooting distance must be a licence condition.
5. Shooters must ensure that the pick-up and the dispatch of wounded birds is undertaken without delay.
6. Shooters must be able to demonstrate the humane dispatch of wounded birds. Competence must be verified by a third party.
7. Registration and reporting of all licensed activity must be introduced. This will enable the introduction of official monitoring.
8. The use of Larsen and other cage traps must be proscribed until and unless there is evidence that the behavioural needs of decoy and trapped birds in such traps or re-designed traps can be met.