

DAERA General Licence Consultation Summary

Introduction

Between 26 May and 21 July 2022, the Department of Agriculture, Environment and Rural Affairs consulted on Wildlife Order (NI) 1985 'General' licences for wild birds. The consultation exercise was authorised at Ministerial level.

The results of the consultation have been analysed and collated in this document and will inform revision of the General Licences. This summary report is being published on the Department's website and will be made available in other formats on request.

Background

All wild birds in Northern Ireland are protected under the terms of the Wildlife (Northern Ireland) Order 1985. However, in certain circumstances, some species can cause problems for landowners. As the statutory wildlife licensing authority in Northern Ireland, DAERA/NIEA can issue licenses to permit control of birds for defined reasons. Licenses can be issued on an individual basis, or alternatively, as 'general' licenses which permit authorized persons to control listed species for specific reasons without the need to apply for an individual license on each occasion. There are currently 3 general bird control licences issued annually in Northern Ireland:

General Licence TPG1. Kill or take certain birds, including the taking, damaging or destruction of their eggs, or the disturbance of such a bird or the young of such a bird for the purpose of preserving public health or public safety.

General Licence TPG2. Kill or take certain birds, including the taking, damaging or destruction of their eggs, or the disturbance of such a bird or the young of such a bird for the purpose of preventing the spread of disease and preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, timber and fisheries.

General Licence TPG3. Kill or take certain birds, including the taking, damaging or destruction of their eggs, or the disturbance of such a bird or the young of such a bird for the purpose of conserving wild birds.

DAERA are currently considering the wild bird general licences for 2022/2023 and beyond. The general licences have been in use for many years, and in response to matters raised by stakeholders, it was recognised that review was appropriate. This consultation was an integral part of that review.

Pending finalisation of review, DAERA issued amended, interim licences. Several bird species were removed from either all or some of the three general licences, either on initial assessment of changes to conservation status or in terms of their applicability to the purpose of the licence. These interim licences were issued without prejudice to what licences may be issued thereafter, following consultation and consideration of all relevant issues by the Department.

Interim licences were intended to provide a degree of certainty for users and other stakeholders while active consideration was on-going.

Consultation

The Department launched the consultation on Wild Bird General Licences on 26 May 2022. It was open for comment for ten weeks, closing on 21 July 2022. The consultation was hosted on Citizen Space with access via the Department's website. The consultation consisted of a series of questions to seek stakeholder views and additional evidence on the following aspects of the general licences: -

1. Species included
2. Alternative methods of control
3. Their use on protected sites
4. Licence conditions

Responses to the Consultation

In total, 1882 substantive responses were received before the consultation deadline, and those that could be identified to a particular sector/ interest are summarised below.

- 1115 responses from Individuals/Private Citizens
- 78 responses from the Environmental sector
- 11 responses from the Animal Welfare sector
- 37 responses from Countryside Sports/Land Management
- 1 response from Local Government
- 14 responses from the Fishing community
- 10 responses from the Pest Control sector
- 25 responses from the Agricultural industry
- 5 responses from Academia

Overview of Responses to the Wild Birds General Licences Consultation

The aim of the consultation was to obtain views and evidence from as wide a range of stakeholders as possible. Most responses reflected those respondents identifying an interest in conservation and/ or animal welfare, and in broad disagreement with the content and rationale of general licences.

There was a high degree of overlap/ repetition in individual responses, and some respondents also failed to differentiate between the three general licence types in their replies. Most responses were in the form of opinion or statement, with helpful information provided by animal welfare, conservation, pest control, agricultural and land management interests. Several contributors including the British Association for Shooting and Conservation (BASC), the Council for Nature Conservation and the Countryside (CNCC), Countryside Alliance and the RSPB provided particularly detailed responses.

The Department has taken on board all comments made in the consultation responses and considering these with wider evidence, will amend the final General Licences where appropriate.

RESPONSE SUMMARY

General Licence TPG1 - Kill or take certain birds, including the taking, damaging or destruction of their eggs, or the disturbance of such a bird or the young of such a bird for the purpose of preserving public health or public safety

Question No.	Question	Engagement	Yes Agree with species inclusion	No Disagree with species inclusion
6	Do you agree that Hooded Crow should be included on TPG1?	1875 (99.63%)	254 (13.5%)	1617 (85.92%)
7	Do you agree that Carrion Crow should be included on TPG1?	1872 (99.47%)	275 (14.61%)	1592 (84.59%)
8	Do you agree that Great Black-backed Gull should be included on TPG1?	1871 (99.42%)	238 (12.65%)	1628 (86.5%)
9	Do you agree that Lesser Black-backed Gull should be included on TPG1?	1867 (99.20%)	230 (12.22%)	1631 (86.66%)
10	Do you agree that Herring Gull should be included on TPG1?	1867 (99.20%)	238 (12.65%)	1621 (86.13%)
11	Do you agree that Jackdaw should be included on TPG1?	1870 (99.36%)	214 (11.37%)	1649 (87.62%)
12	Do you agree that Magpie should be included on TPG1?	1870 (99.36%)	269 (14.29%)	1594 (84.7%)
13	Do you agree that Feral Pigeon should be included on TPG1?	1867 (99.20%)	452 (24.02%)	1395 (74.12%)
14	Do you agree that Wood Pigeon should be included on TPG1?	1867 (99.20%)	276 (14.67%)	1576 (83.74%)
15	Do you agree that Rook should be included on TPG1?	1869 (99.31%)	223 (11.85%)	1634 (86.82%)
16	Do you agree that House Sparrow should be included on TPG1?	1865 (99.10%)	79 (4.2%)	1775 (94.31%)
17	Do you agree that Starling should be included on TPG1?	1869 (99.31%)	171 (9.09%)	1679 (89.21%)

Qualitative Analysis

Hooded Crow

Academic: Two comments suggesting that this species should be dealt with via individual licensing should a problem arise.

Agriculture: One responder stated that Hooded crows have no impact on public health and or safety. The remaining comments referred to impacts on livestock or small wild birds which is not relevant to this licence purpose.

Animal Welfare: Respondents stated that this species is not included on other devolved administration's general licences for this purpose, that there should be a higher ethical bar for the killing of any animal and that if there is a specific problem then a specific licence could be applied for.

Countryside Sports: A small number of responses cited human health implications of Hooded crows with little supporting evidence.

Environmental Organisations: Most stated that there was no evidence that Hooded crows were a threat to human health or safety and should the situation arise then an individual licence was more appropriate.

Fishing: No relevant comment.

Local government: Respondents questioned that this species is not included on other devolved administration's general licences for this purpose.

Pest Controllers: One referenced concerns about aircraft safety at airports and the risk to public safety. Another stated that there was no evidence that Hooded crows were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. There were no further comments mentioning public health and safety.

Private Citizens: Several state that there is no evidence that Hooded crows were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. Respondents highlighted that this species is not included on other devolved administration's general licences for this purpose. Several respondents highlighted concerns about wild bird population declines. There was a reference to Hooded crow droppings being a human health issue and that the birds are a threat to pets. Concerns were also raised about Larsen trap control.

Carrion Crow

Academic: Two comments suggesting that this species should be dealt with via individual licensing should a problem arise and that the species does not appear on other UK General licences.

Agriculture: Comments referred to impacts on livestock or small wild birds, not relevant to this licence type.

Animal Welfare: Respondents highlight that this species is not included on other devolved administration's general licences for this purpose and that if there is a specific problem then a specific licence could be applied for.

Countryside Sports: Small number of responses cited human health implications of carrion crows with little supporting evidence.

Environmental Organisations: The majority of this category stated that there was no evidence that Carrion crows were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. Additional references that the species is not included on this licence type elsewhere and is only found in Northern Ireland in small numbers.

Fishing: No relevant comment.

Local government: Respondents questioned that this species is not included on other devolved administration's general licences for this purpose.

Pest Controllers: One referenced concern about aircraft safety at airports and the risk to public safety. Another stated that there was no evidence that carrion crows were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. No other comments referred to public health and safety.

Private Citizens: Several stated that there is no evidence that Carrion crows were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. Respondents highlighted that this species is not included on other devolved administration's general licences for this purpose. Concerns also expressed about the general state of wild bird population. There was a reference to Carrion crow droppings being a human health issue.

Great Black-backed Gull

Academic: The species does not appear on other UK General licences, where a problem arises it should be dealt with by specific licence.

Agriculture: There was comment on the impact on seabirds in general from bird flu and Great Black-backed gulls not being a threat to public safety.

Animal welfare: Respondents highlight that this species is not included on other devolved administration's general licences for this purpose and that if there is a specific problem then a specific licence could be applied for.

Countryside sports: One respondent cited gull species carrying botulism contamination from landfill sites as a risk to human health.

Environmental organisations: One reference to bird faeces being no more dangerous than any those of any other wild animal. Most questioned a lack of evidence of any human safety or health concerns associated with this species, and where a problem arises a specific licence could be applied for. Also highlighted was the fact that this species is not included in any other UK General licence for this purpose. Concerns expressed about declining numbers of this species across Europe. Several mentions of normal predation behaviour on other wild species.

Fishing: Concerns about impact on fish and wildfowl and cite they are 'nuisance' to the public.

Local Government: Conservation concerns and reference that this species is not included on other devolved administration's general licences for this purpose.

Pest Controllers: One referenced concerns about impacts with large gulls and general aircraft safety at airports and the risk to public safety. Another stated that there was no evidence that Great Black-backed gulls were a threat to human health or safety, and should the situation arise then an individual licence was more appropriate. There was a reference to urban nesting on city centre roof tops and the risk posed to maintenance workers.

Private Citizens: Several state that there is no evidence that Great Black-backed Gulls were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. Respondents highlighted that this species is not included on other devolved administration's general licences for this purpose. Concerns also expressed about the general state of wild bird populations. There is a reference to Great Black-backed Gulls droppings being a human health concern.

Lesser Black-backed Gull

Academic: The species does not appear on other UK General licences, and where a problem arises it should be dealt with by specific licence.

Agriculture: Lesser Black-backed gulls are not a threat to public safety.

Animal welfare: Respondents highlight that this species is not included on other devolved administration's general licences for this purpose and that if there is a specific problem then a specific licence could be applied for. Concerns raised about declining seabird numbers due to bird flu.

Countryside sports: One respondent cited gull species carrying botulism contamination from landfill sites as a risk to human health.

Environmental organisations: One reference to bird faeces being no more dangerous than any those of any other wild animal. Most questioned a lack of evidence of any human safety or health concerns associated with this species, and where a problem arises a specific licence could be applied for. Also highlighted that this species is not included in any other UK General licence for this purpose. Concerns about declining numbers of this species across Europe.

Fishing: Concerns about impact on fish and wildfowl and cited they are 'nuisance' to the public without elaboration.

Local Government: Conservation concerns and questioned that this species is not included on other devolved administration's general licences for this purpose.

Pest Controllers: One referenced concerns about impacts with large gulls and general aircraft safety at airports and the risk to public safety. Another stated that there was no evidence that Lesser Black-backed gulls were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. There was a reference to urban nesting on city centre roof tops and the risk posed to maintenance workers.

Private Citizens: Several state that there is no evidence that Lesser Black-backed Gulls were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. Respondents highlighted that this species is not included on other devolved administration's general licences for this purpose. Concerns also expressed about the general state of wild bird populations. There was a reference to Lesser Black-backed Gull droppings being a human health issue. One reference to people being attacked when birds, believed to be this species, were nesting on top of a 20m high silo.

Herring Gull

Academic: The species does not appear on other UK General licences, where a problem arises it should be dealt with by specific licence.

Agriculture: Reference to bird droppings being a public safety issue.

Animal welfare: Respondents highlight that this species is not included on other devolved administration's general licences for this purpose and that if there is a specific problem then a specific licence could be applied for.

Countryside sports: One respondent cited gull species carrying botulism contamination from landfill sites as a risk to human health.

Environmental organisations: Most suggested a lack of evidence of any human safety or health concerns associated with this species, and where a problem arises a specific licence could be applied for. Also highlighted is the fact that this species is not included in any other UK General licence for this purpose. Concerns about declining numbers of this species across Europe.

Fishing: Concerns about impact on wildfowl.

Local Government: Conservation concerns and highlighted that this species is not included on other devolved administration's general licences for this purpose.

Pest Controllers: One referenced concern about impacts with large gulls and general aircraft safety at airports and the risk to public safety. Another stated that there was no evidence that Herring Gulls were a threat to human health or safety, and should the situation arise then an individual licence was more appropriate.

Private Citizens: Several stated that there is no evidence that Herring Gulls were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. Respondents highlighted that this species is not included on other devolved administration's general licences for this purpose. A number highlighted concerns about the general state of wild bird population. There was a reference to Herring Gull droppings being a human health issue and another of concerns that the birds cause water pollution.

Jackdaw

Academic: The species does not appear on other UK General licences, where a problem arises it should be dealt with by specific licence.

Agriculture: A reference to nesting in chimneys and blocking flues. Another reference to covering the chimney with a cowl as a preventative measure.

Animal welfare: Respondents highlighted that this species is not included on other devolved administration's general licences for this purpose and that if there is a specific problem then a specific licence could be applied for.

Countryside sports: Concerns about carrying disease (unspecific) and they should be controlled. A further reference to bird fouling being a human health risk.

Environmental organisations: Most highlighted a lack of evidence of any human safety or health concerns associated with this species, and where a problem arises a specific licence could be applied for. Also highlighted is the fact that this species is not included in any other UK General licence for this purpose. Several cited that the risk from wild bird droppings is no more or less than risk from livestock faeces.

Fishing: concerns about impact wildlife and livestock.

Local Government: Conservation concerns and questioned that this species is not included on other devolved administration's general licences for this purpose.

Pest Controllers: One referenced concerns about large corvids and general aircraft safety at airports and the risk to public safety. Another stated that there was no evidence that Jackdaws were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. One unspecific reference to impacts on wildlife and livestock.

Private Citizens: several state that there is no evidence that Jackdaws were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. There is a reference to threat from Jackdaw droppings. Respondents highlighted that this species is not included on other devolved administration's general licences for this purpose.

Magpie

Academic: The species does not appear on other UK General licences, and where a problem arises it should be dealt with by specific licence.

Agriculture: No threat to public safety.

Animal welfare: Respondents highlight that this species is not included on other devolved administration's general licences for this purpose and that if there is a specific problem then a specific licence could be applied for.

Countryside sports: Unspecific reference to birds carrying disease and that they should be controlled.

Environmental organisations: Most highlighted a lack of evidence of any human safety or health concerns associated with this species, and where a problem arises a specific licence could be applied for. Also highlighted is the fact that this species is not included in any other UK General licence for this purpose.

Fishing: Concerns about impacts on wildlife and livestock.

Local Government: Conservation concerns and questioned that this species is not included on other devolved administration's general licences for this purpose.

Pest Controllers: One referenced concerns about impacts with large corvids and general aircraft safety at airports and the risk to public safety. Another stated that there was no evidence that magpies were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. One reference to impacts on wildlife and livestock (unspecific). One cited their experiences; 'Magpies have not caused issues where we have been needed to take control measures'.

Private Citizens: Several stated that there is no evidence that Magpies were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. There were very few comments which attempted to explain the risk to human health from this species. Respondents highlighted that this species is not included on other devolved administration's general licences for this purpose. Most respondents wanting to retain the bird on the licence highlighted the impact on wildlife or livestock.

Feral Pigeon

Academic: Where a problem arises it should be dealt with by specific licence.

Agriculture: Concerns raised about pigeons around grain stores causing contamination and potential human health issues. Concerns about staff safety on farm sites. Specific licences could be issued if problems arise.

Animal welfare: If there is a specific problem then a specific licence could be applied for.

Countryside sports: Concerns raised about birds carrying disease (unspecific) and they should be controlled. A mention of the threat from bird flu and the risk to livestock.

Environmental organisations: Most were content for the species to remain on the TPG1 licence but would prefer individual licensing. One highlighted that there may be difficulty distinguishing the difference between Feral pigeons, Rock doves and Stock doves.

Fishing: No comments.

Local Government: Conservation concerns and questioned that this species is not included on other devolved administration's general licences for this purpose.

Pest Controllers: One referenced concern about collisions with pigeons and general aircraft safety at airports and the risk to public safety. Concerns about diseases spread by pigeons in contact with humans. Reference to impacts on livestock through contaminated feed.

Private Citizens: Several stated that there was no evidence that feral pigeons were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. Most stated that there was a significant risk to health from feral pigeons, although many thought that an individual licence response would be better.

Wood Pigeon

Academic: The species does not appear on other similar UK General licences, where a problem arises it should be dealt with by specific licence.

Agriculture: Concerns about pigeons and bird flu as a risk to human health.

Animal welfare: The species does not appear on other UK General licences, and where a problem arises it should be dealt with by specific licence.

Countryside sports: A statement about birds carrying disease (unspecific) and that they should be controlled. A mention of the threat from fungal pathogens carried by pigeons.

Environmental organisations: No evidence of any public safety issues. Should it arise individual licences could be issued. Comments about population declines. Comments about crop damage.

Fishing: Only references to crop damage.

Local Government: Conservation concerns and questioned that this species is not included on other devolved administration's general licences for this purpose.

Pest Controllers: One referenced concern about impacts with pigeons and general aircraft safety at airports and the risk to public safety.

Private Citizens: Several stated that there is no evidence that Wood pigeons were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. Many stated this species is not included on other administration's General Licence for this purpose.

There were very few comments which attempted to explain the risk to human health by this species.

Rook

Academic: The species does not appear on other UK General licences, and where a problem arises it should be dealt with by specific licence.

Agriculture: Concerns about Rooks and bird flu as a risk to human health.

Animal welfare: The species does not appear on other UK General licences, and where a problem arises it should be dealt with by specific licence.

Countryside sports: A statement about birds carrying disease (unspecific) and they should be controlled. A reference to bird fouling and another to the noise and mess associated with rookeries. The bulk of respondents highlighted the impact of large Rook flocks on cereal crops.

Environmental organisations: No evidence of any public safety issues. Should it arise individual licences could be issued. Comments about population declines. Comments about crop damage.

Fishing: no comments.

Local Government: Conservation concerns and questioned that this species is not included on other devolved administration's general licences for this purpose.

Pest Controllers: One referenced concern about impacts with corvids and general aircraft safety at airports and the risk to public safety.

Private Citizens: Several state that there is no evidence that Rooks were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. One respondent mentioned having an orchard where the rooks eat apples and defecate. Other references to droppings etc under rookeries and unexpanded 'pest', 'vermin' comments. Several comments mention the decline in the species population figures. Many state this species isn't included on other administration's General Licence for this purpose.

There were few comments attempting to explain the risk to human health from this species.

House Sparrow

Academic: The species does not appear on other UK General licences, where a problem arises it should be dealt with by specific licence.

Agriculture: There were no comments in support of sparrows being retained on the TPG1 licence, nor references of a threat to human health or safety.

Animal welfare: The species does not appear on other UK General licences, where a problem arises it should be dealt with by specific licence.

Countryside sports: A statement about birds carrying disease (unspecific) and they should be controlled. A reference to bird fouling where the birds group together in large numbers. The

bulk of respondents highlighted that the sparrow was no threat to human health or safety. Concerns about declining numbers of the species.

Environmental organisations: No evidence of any public safety issues. Should it arise individual licences could be issued. Comments about population declines.

Fishing: No threat to human health or safety.

Local Government: Conservation concerns and questioned that this species is not included on other devolved administration's general licences for this purpose.

Pest Controllers: One referenced concern about impacts with sparrows and general aircraft safety at airports and the risk to public safety. Reference to protecting premises which produce or store human food stuffs. Site specific licences could be issued.

Private Citizens: The majority stated that there was no evidence that House sparrows were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. Many comments mentioned the decline in the species' population figures with subsequent 'Red Listing' and that this species isn't included on other administration's General Licence for this purpose.

There are very few comments which attempt to explain the risk to human health by this species with the unspecific 'pest', 'vermin' comments.

Starling

Academic: The species does not appear on other UK General licences, where a problem arises it should be dealt with by specific licence.

Agriculture: A couple of responses mentioned contamination of animal feeds. Several mention the decline in the species as a cause for concern. Although not relevant to this licence type, one individual associated the species with destruction of other wild bird species through nest raiding.

Animal welfare: The species does not appear on other UK General licences, where a problem arises it should be dealt with by specific licence. Concerns about species decline.

Countryside sports: A statement about birds carrying disease (unspecific) and they should be controlled. Several references to bird fouling where the birds group together in large numbers, particularly within cattle sheds. One mention of physical damage to buildings. Concerns about declining numbers of the species.

Environmental organisations: No evidence of any public safety issues. Should it arise individual licences could be issued. Comments about population declines. One mention of damage to buildings.

Fishing: no threat to human health or safety.

Local Government: conservation concerns and questioned that this species is not included on other devolved administration's general licences for this purpose.

Pest Controllers: One referenced concerns about impacts with starling and general aircraft safety at airports and the risk to public safety. Reference to protecting premises which produce or store human food stuffs. A couple of references to the species being a major pest across business, domestic and farm properties. Site specific licences could be issued.

Private Citizens: The majority state that there is no evidence that starlings were a threat to human health or safety and should the situation arise then an individual licence was more appropriate. There are very few comments which attempt to explain the risk to human health by this species with the unspecific 'pest', 'vermin' comments. There is a reference to effects of bird faeces on buildings and property. Many comments mention the decline in the species population figures and its 'Red listing'. Many state this species isn't included on other administration's General Licence for this purpose.

General Licence TPG2. Kill or take certain birds, including the taking, damaging or destruction of their eggs, or the disturbance of such a bird or the young of such a bird for the purpose of preventing the spread of disease and preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, timber and fisheries.

Question No.	Question	Engagement	Yes Agree with species inclusion	No Disagree with species inclusion
18	Do you agree that Hooded Crow should be included on TPG2?	1862 (98.94%)	1028 (54.62%)	829 (44.05%)
19	Do you agree that Carrion Crow should be included on TPG2?	1858 (98.72%)	1057 (56.16%)	798 (42.40%)
20	Do you agree that Great Black-backed Gull should be included on TPG2?	1856 (98.62%)	242 (12.86%)	1610 (85.55%)
21	Do you agree that Lesser Black-backed Gull should be included on TPG2?	1853 (98.46%)	228 (12.11%)	1618 (85.97%)
22	Do you agree that Herring Gull should be included on TPG2?	1849 (98.25%)	242 (12.86%)	1598 (84.91%)
23	Do you agree that Jackdaw should be included on TPG2?	1863 (98.99%)	231 (12.27%)	1629 (86.56%)
24	Do you agree that Magpie should be included on TPG2?	1856 (98.62%)	279 (14.82%)	1567 (83.26%)
25	Do you agree that Feral Pigeon should be included on TPG2?	1857 (98.67%)	1196 (63.55%)	652 (34.64%)
26	Do you agree that Wood Pigeon should be included on TPG2?	1858 (98.72%)	1085 (57.55%)	764 (40.60%)
27	Do you agree that Rook should be included on TPG2?	1857 (98.67%)	915 (48.62%)	934 (49.63%)
28	Do you agree that House Sparrow should be included on TPG2?	1855 (98.57%)	93 (4.94%)	1752 (93.09%)
29	Do you agree that Starling should be included on TPG2?	1860	172	1674

		(98.83%)	(9.14%)	(88.95%)
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Qualitative Analysis

Hooded Crow

Academic: Some noted that Hooded crows have the potential to target livestock and crops. Others agreed with this and note the potential that an individual licence could be applied for in such cases

Agriculture: Majority in this category agree that Hooded crow have the potential to cause damage to foodstuff for livestock and crops. Some also indicate that Hooded crows can predate on the eyes of newly born livestock. Points were also made on the potential for crows to predate on eggs of other birds which are more relevant in licence TPG3.

Animal Welfare: References that individual licences could be granted in certain circumstances. Others stated that no licences for the taking of birds should ever be granted. One respondent acknowledged that Hooded crows had the capacity to predate on the young of certain livestock.

Countryside Sports: Hooded crows can spread disease to foodstuff for livestock as well as to crops. Multiple respondents also pointed out that Hooded crow can predate on the eyes of lambs.

Environmental Organisations: Some believed that they do cause damage to livestock and foodstuffs, but most believed that this can be rectified by an individual specific licence on a case-by-case basis.

Fishing: No qualitative responses given from the fishing community.

Local government: No qualitative response to this question

Pest Controllers: Consensus within this sector is that Hooded crows can cause serious damage to livestock and crops.

Private Citizens: Multiple respondents made reference to having seen damage caused to lambs and crops caused by this species. Others stated that there was limited evidence for this species inclusion. Multiple respondents made the point that an individual licence can be used in cases where they are required. A few responses note that scarecrows or electronic scarers could be used as an alternative to taking the birds.

Carrion Crow

Academic: It is noted by this group that Carrion crow have the potential to target livestock and crops

Agriculture: The consensus within this category is that Carrion Crow can attack livestock and target crops.

Animal Welfare: Individuals recognised that that these birds can target livestock and crops but believe that individual licences should be applied for in such cases and only when the problem is substantial. Others believe that birds should never be controlled to protect human food sources as they are just following natural behaviours.

Countryside Sports: Individuals in this group believe that TPG2 listing is justified as Carrion crow can cause damage to crops and livestock, in particular lambs.

Environmental Organisations: Some quoted a study from Newson et al 2019 stating there is little to no evidence Carrion crow cause severe damage to livestock and crops. However, other recognise that they have the potential to do so, and that individual licences should be applied for in such cases.

Fishing: This sector did not contribute a qualitative response to this question

Local government: This sector did not contribute a qualitative response to this question

Pest Controllers: Consensus among this group is that Carrion crow can cause damage to both livestock and crops

Private Citizens: Mixed opinions on the amount of evidence relating to Carrion crows causing severe damage to crops and livestock and that where such incidents occur a specific licence should be applied for. Reference was made to birds naturally congregating around areas of food abundance which may skew the species population estimates. Significant numbers who believed killing birds for any reason is unethical.

Great Black-Backed Gull

Academic: No evidence of impact and an individual licence should be considered if such a case arises

Agriculture: Responses indicate that a specific licence should be used. Several references to impacts on livestock. Other responses mentioned predation of other bird eggs, but it is not clear whether this referred to domestic or wild species.

Animal Welfare: Reject the taking of these birds for ethical reasons due to lack of evidence of need, also declining numbers. Note that specific licences could be applied for if required.

Countryside Sports: Concerns about this species being a vector of avian flu cases in sea bird populations. One response noted that some gulls spend time at landfill sites and could therefore be in contact with other types of disease. Some reject that gull species are in population decline.

Environmental Organisations: Most request the removal of this species from the general licence due to its poor conservation status. One suggested impact on livestock especially new-born lambs. Others note that the spread of disease from wild birds to poultry can be controlled via husbandry measures.

Fishing: This sector did not contribute a qualitative response to this question

Local government: This sector did not contribute a qualitative response to this question

Pest Controllers: Note that individual licences could be applied for. There are also others who consider gulls “pests”.

Private Citizens: Polarised views on this species within this group. Some believe that the bird should be removed from general licences due to little evidence of attacks on livestock and due to the declining population numbers whilst others believe that there are substantial numbers in some areas and that they have witnessed attacks on livestock from this species.

Lesser Black-Backed Gull

Academic: No evidence of impact and an individual licence should be considered if such a need occurs

Agriculture: Responses indicate that a specific licence should be used. Some responses mentioned predation of other bird eggs, but it is not clear whether this referred to domestic or wild species.

Animal Welfare: Reject the taking of these birds for ethical reasons due to lack of evidence of need, and also declining population statistics. Note that specific licences could be applied for if required

Countryside Sports: Some suggest that they should stay on licence TPG2 due to the rising numbers of avian flu cases in sea bird populations to prevent the spread of disease. Another response noted that some gulls spend time at landfill sites and could therefore be in contact with other types of disease. Some reject that gull species are in population decline.

Environmental Organisations: Most request the removal of this species from the general licence due to its poor conservation status. Others note that the spread of disease from wild birds to poultry can be controlled via husbandry measures.

Fishing: This sector did not contribute a qualitative response to this question.

Local government: This sector did not contribute a qualitative response to this question.

Pest Controllers: Noted that individual licences could be applied for. There are also others who consider gulls “pests”.

Private Citizens: Polarised views on this species within this group. Some believe that the species should be removed from licence TPG2 due to little evidence of attacks on livestock and due to the declining population numbers, whilst others believe that there are substantial numbers in some areas and that they have witnessed attacks on livestock from this species.

Herring Gull

Academic: No evidence of impact and an individual licence should be considered if such a case arises

Agriculture: Responses indicate that a specific licence should be used.

Animal Welfare: Reject the taking of these birds for ethical reasons due to lack of evidence of need, and also declining numbers. Note that specific licences could be applied for if required

Countryside Sports: Some suggest that they should stay on licence TPG2 due to the rising numbers of avian flu cases in sea bird populations, to prevent the spread of disease. Another response noted that some gulls spend time at landfill sites and could therefore be in contact with other types of disease. Some reject that gull species are in population decline

Environmental Organisations: Most requested the removal of this species from the licence TPG2 due to its poor conservation status. It was noted that Herring Gull is a Red-listed species. Additional references that the spread of disease from wild birds to poultry can be controlled via husbandry measures.

Fishing: This sector did not contribute a qualitative response to this question

Local government: This sector did not contribute a qualitative response to this question

Pest Controllers: Suggested that individual licences could be applied for. There are also others who consider gulls “pests”.

Private Citizens: Polarised views on this species within this group. Some believe that the bird should be removed from licence TPG2 due to little evidence of attacks on livestock and due to the declining population numbers whilst others believe that there are substantial numbers in some areas and that they have witnessed attacks on livestock from this species.

Jackdaw

Academic: No known evidence of Jackdaws having an impact and an individual licence should be considered if such a case arises.

Agriculture: Some responses note potential damage to crops and spread of disease through fouling whilst other say that they are having limited impact and should an issue arise an individual licence could be applied for.

Animal Welfare: Reject the taking of these birds for ethical reasons due to lack of evidence of need with Jackdaws. Note that specific licences could be applied for if required.

Countryside Sports: A respondent has been asked to take jackdaws by farmers due to the species eating large amounts of livestock feed. Others note that jackdaws cause damage to crop through feeding and trampling.

Environmental Organisations: Most request the removal of Jackdaw from the licence TPG2 due to limited evidence of any impact caused by the species. The consensus is that an individual licence can be applied for in this case.

Fishing: This sector did not contribute a qualitative response to this question.

Local government: This sector did not contribute a qualitative response to this question.

Pest Controllers: Suggested that individual licences could be applied for. There are also others who consider Jackdaws a “pest” species that require control.

Private Citizens: Polarised views on this species within this group. Some believe that the bird should be removed from general licences due to little evidence of attacks on livestock and due to the declining population numbers whilst others believe that there is sufficient evidence for jackdaws to remain on licence TPG2.

Magpie

Academic: Consensus is that there is little evidence available for Magpie causing an issue for this licence type. An individual licence could be applied for in such cases.

Agriculture: Some responses stated potential issues with Magpies attacking new-born livestock. Others say they haven’t experienced this. A few suggested the spread of diseases such as avian flu as a reason to keep Magpie on the licence.

Animal Welfare: Reject the taking of these birds for ethical reasons due to lack of evidence of need with Magpie. Note that specific licences could be applied for if required

Countryside Sports: Responses stated that livestock are at risk from Magpie damage, and the potential risk through spread of disease such as avian flu.

Environmental Organisations: Most requested the removal from licence TPG2 due to limited evidence that Magpie cause the damage required for them to be included.

Fishing: This sector did not contribute a qualitative response to this question

Local government: This sector did not contribute a qualitative response to this question

Pest Controllers: Some suggested that individual licences could be applied for whilst others recommend that magpie stay on licence TPG2. There are also others who considered Magpie a “pest” species that required control. One referenced impact on livestock and problems with groups of birds on farm premises (both unexplained).

Private Citizens: Polarised views on this species within this group. Some believe that the bird should be removed from general licences due to little evidence of attacks on livestock. Others believe they should stay on the licence due to “excessive numbers” and that they have the potential to spread disease.

Feral Pigeon

Academic: This group suggest that evidence for damage caused to crops from Feral pigeon exists and that they should stay on licence TPG2 for this reason.

Agriculture: General references to Feral pigeons causing damage to crops and spreading diseases such as avian flu. Additional reference to pigeons fouling animal feed and crop stores.

Animal Welfare: Consensus within this section is that Feral pigeons should not be included on licence TPG2 on ethical grounds.

Countryside Sports: Consensus within this group is that Feral pigeon should remain on the general licence for reasons such as fouling within storage sheds and feeding troughs, spread of disease and large population numbers.

Environmental Organisations: Most have no issues with Feral pigeon remaining on the general licence however suggest individual licences are considered.

Fishing: This sector did not contribute a qualitative response to this question

Local government: This sector did not contribute a qualitative response to this question

Pest Controllers: Consensus is that Feral pigeon should remain on the licence due to fouling within agricultural sheds.

Private Citizens: There is a mixed response within this category. Some believe there is limited evidence for the inclusion of feral pigeon on licence TPG2, others believe that feral pigeon can cause considerable damage to crop as well as fouling.

Wood Pigeon

Academic: This group suggest that evidence for damage caused to crops from Wood pigeon exists and that they should stay on the general licence for this reason.

Agriculture: Members from this group suggest that Wood pigeon can cause damage to crops (particularly grain) and spread disease such as avian flu. Most respondents commented on the impact of large flocks of Wood pigeon on cereal crops.

Animal Welfare: Consensus within this section is that Wood pigeons should not be included on licence TPG2 on ethical grounds. However, one respondent concedes that there is potential for damage to crops.

Countryside Sports: Consensus within this group is that Wood pigeon should remain on licence TPG2 for reasons such as fouling within storage sheds and feeding troughs, spread of disease and large population numbers. The bulk of respondents highlighted the impact of large pigeon flocks on cereal crops.

Environmental Organisations: Most have no issues with Wood pigeon remaining on licence TPG2 however suggest individual licences are considered.

Fishing: This sector did not contribute a qualitative response to this question.

Local government: This sector did not contribute a qualitative response to this question.

Pest Controllers: Consensus was that Wood pigeon should remain on licence TPG2 due to fouling within agricultural sheds, and considerable damage to crops as a result of high numbers.

Private Citizens: References to limited evidence for the inclusion of Wood pigeon on licence TPG2, whilst others believe the species can cause considerable damage to crops as well as issues around fouling. A point was made that all birds will eat food that is readily available to them and more should be done to protect crops and ensure storage barns are closed with no access.

Rook

Academic: It is suggested that there is evidence for the need for Rook to remain on the licence due to potential damage to livestock and crops.

Agriculture: There was a mixed response in that some considered that Rooks were beneficial because they consume pest invertebrates, while others considered them a pest species because of impact of large flocks on cereal crops. However the majority in this category believed that Rooks have the potential to cause damage to crops and should remain on this licence.

Animal Welfare: Individual licences could be granted in certain circumstances. Others reject the taking of birds for ethical reasons

Countryside Sports: This species damages crops and can cause issues by fouling in feeding troughs.

Environmental Organisations: The consensus within this group is that Rook should be removed from the general licence due to its declining population status.

Fishing: No qualitative responses received.

Local government: No qualitative responses received.

Pest Controllers: One stated that corvids cause a lot of strikes around airports. Consensus within this sector is that Rook can cause serious damage to crops.

Private Citizens: Multiple respondents make reference to Rooks causing damage to crops. Others reference the species beneficial role to the agricultural sector by eating leatherjackets. Some respondents highlight declining population status and there are those who reject the inclusion on ethical grounds.

House Sparrow

Academic: It is suggested that there is no evidence of need for house sparrow to remain on this licence. The consensus is that they should be removed due to their population status and the point is made is that they aren't included on other UK general licences

Agriculture: There is a split in this sector. Some believe they should remain on whilst others suggest that they are a Red List species and should be removed.

Animal Welfare: Arguments are made that individual licences could be granted in certain circumstances. Others reject the taking of birds for ethical reasons.

Countryside Sports: There is a split in this sector with some suggesting they cause damage to crops and spread disease. Others believe they should be removed due to their declining population status.

Environmental Organisations: The consensus within this group is that House sparrow should be removed from licence TPG2 due to its declining population status.

Fishing: No qualitative responses received.

Local government: No qualitative responses to this question

Pest Controllers: Suggestions that an individual licence could be applied for if the need arises.

Private Citizens: There is a mix of responses from this category. The majority state that they should be removed due to limited harm being caused whilst others believe they should remain due to the potential to spread disease.

Starling

Academic: It is suggested that there is no evidence of need for Starling to remain on this licence. The consensus is that they should be removed due to their population status and the point is made is that they aren't included on other UK general licences.

Agriculture: There is a split in this sector. Some believe they should remain on due to problems with large numbers fouling in feedstores whilst others suggest that they are a Red List species and should be removed.

Animal Welfare: Arguments are made that individual licences could be granted in certain circumstances. Others reject the taking of birds for ethical reasons.

Countryside Sports: There is a split in this category with some suggesting they cause damage to crops and spread disease by fouling in storage sheds. Others believe they should be removed due to their declining population status.

Environmental Organisations: The consensus within this group is that starling should be removed from licence TPG2 due to its declining population status.

Fishing: No qualitative responses received.

Local government: No qualitative responses received.

Pest Controllers: Suggestions that an individual licence could be applied for if the need arises.

Private Citizens: There is a mix of responses from this category. The majority state that they should be removed due to limited harm being caused whilst others believe they should remain due to the potential to spread disease.

General Licence TPG3 Kill or take certain birds, including the taking, damaging or destruction of their eggs, or the disturbance of such a bird or the young of such a bird for the purpose of conserving wild birds.

Question No.	Question	Engagement	Yes Agree with species inclusion	No Disagree with species inclusion
30	Do you agree that Hooded Crow should be included on TPG3?	1844 (98.14%)	1233 (65.52%)	611 (32.47%)
31	Do you agree that Carrion Crow should be included on TPG3?	1843 (97.93%)	1242 (65.99%)	599 (31.83%)
32	Do you agree that Great Black-backed Gull should be included on TPG3?	1846 (98.09%)	272 (14.45%)	15.69 (83.37%)
33	Do you agree that Lesser Black-backed Gull should be included on TPG3?	1844 (97.98%)	262 (13.92%)	1576 (83.74%)
34	Do you agree that Jackdaw should be included on TPG3?	1849 (98.25%)	247 (13.12%)	1595 (84.75%)
35	Do you agree that Magpie should be included on TPG3?	1852 (98.41%)	317 (16.84%)	1529 (81.24%)
36	Do you agree that Feral Pigeon should be included on TPG3?	1844 (97.98%)	303 (16.10%)	1536 (81.62%)
37	Do you agree that Wood Pigeon should be included on TPG3?	1846 (98.09%)	231 (12.27%)	1612 (85.65%)
38	Do you agree that Rook should be included on TPG3?	1848 (98.19%)	243 (12.91%)	1596 (84.80%)

Qualitative Analysis

Hooded Crow

Academic: Concerns about the impact of Hooded crows on nesting waders. Content if used only where a serious problem has occurred.

Agriculture: Concerns about the impact of Hooded crows on nesting waders and other nesting birds.

Animal Welfare: Respondents highlighted that there should be a higher ethical bar for the killing of any animal. One mentioned that waders are at risk from Hooded crow. The remainder took a zero tolerance approach to the killing of any bird.

Countryside Sports: Comments all refer to the adverse impact of Hooded crows on wildlife, especially ground nesting birds.

Environmental Organisations: The majority in this sector stated that Hooded crows were a threat to ground nesting birds especially waders. Many specified that the licence should only apply to protect species of conservation concern and should the situation arise, an individual licence was more appropriate.

Fishing: No comments received

Local government: No comments received.

Pest Controllers: Several highlighted their impact on farms but especially on nesting birds. Another stated that it was a natural process and 'predation happens'.

Private Citizens: There were a mix of opinions within this category which were quite polarised; Some raised concerns about killing Hooded crows whilst others believe that the species is detrimental to a range of ground nesting birds. Many referenced the role of poor-quality habitat in wader population declines.

Carrion Crow

Academic: Concerns about the impact of Carrion crows on nesting waders. Content if used only where a serious problem has occurred.

Agriculture: Concerns about the impact of Carrion crows on nesting waders and other nesting birds.

Animal Welfare: Respondents highlight that there should be higher ethical bar for the killing of any animal. One mentioned that waders were at risk from Carrion crow predation. The remainder took a zero tolerance approach to the killing of any bird.

Countryside Sports: Comments all referred to the adverse impact of Carrion crows on wildlife, especially ground nesting birds.

Environmental Organisations: The majority in this sector stated that Carrion crows were a threat to ground nesting birds especially waders, many specifying that the licence should only apply to protect species of conservation concern and should the situation arise, an individual licence was more appropriate.

Fishing: No comment.

Local government: No comment.

Pest Controllers: Reference to impacts on ground nesting birds.

Private Citizens: There were a mix of opinions within this category which were quite polarised; concerns were raised about killing Carrion crows and those who believed that the species is detrimental to a range of ground nesting birds. Several commented that this is an uncommon species in Northern Ireland. Many considered that poor quality habitat that has led to a decline in waders, not purely predator activity. Specific licensing in cases where there is a proven issue.

Great Black-Backed Gull

Academic: General licences of this type do not exist elsewhere in the UK and N. Ireland should follow this example. Specific licensing used only where a serious problem has occurred.

Agriculture: Concerns about the impact of Great black-backed gulls on nesting waders and other nesting birds. Some responses mentioned predation of other bird eggs, but it is not clear whether this referred to domestic or wild species. Specific licensing used only where a serious problem has occurred.

Animal Welfare: Respondents highlighted that there should be higher ethical bar for the killing of any animal. One mentioned that waders are at risk from Great black backed gulls. One questioned the unrestricted geographical nature of the general licence.

Countryside Sports: Comments all referred to the adverse impact of these birds on wildlife, especially ground nesting birds.

Environmental Organisations: This species is not on the GB equivalent licences. Should the situation arise where a bird was causing an issue then an individual licence was more appropriate.

Fishing: Not viewed as pest or problem species.

Local government: No comments received.

Pest Controllers: Several stated that individual licences could be issued where a problem arises.

Private Citizens: There were a mix of opinions within this sector which were quite polarised; concerns raised about killing Great black-backed gulls and those who believed that the species was detrimental to a range of ground nesting birds. Several commented that this is an uncommon species in Northern Ireland. Many suggested that poor quality habitat has led to a decline in waders not purely predator activity. Specific licensing in cases where there is a proven issue.

Lesser Black-Backed Gull

Academic: General licences of this type do not exist elsewhere in the UK and N. Ireland should follow this example. Specific licensing used only where a serious problem has occurred.

Agriculture: Concerns about the impact of Lesser black-backed gulls on nesting waders and other nesting birds. Some responses mentioned predation of other bird eggs, but it is not clear whether this referred to domestic or wild species. Specific licensing used only where a serious problem has occurred.

Animal Welfare: Respondents highlighted that there should be higher ethical bar for the killing of any animal. One mentioned that waders were at risk from Lesser black-backed gulls. The remainder took a zero tolerance approach to the killing of any bird. Another questioned the unrestricted geographical nature of the general licence.

Countryside Sports: Comments all referred to the adverse impact of these birds on wildlife, especially ground nesting birds.

Environmental Organisations: This species is not on the GB equivalent licences. Should the situation arise where a bird was causing an issue then an individual licence was more appropriate.

Fishing: Not viewed as pest or problem species.

Local government: No comments received.

Pest Controllers: One commented that as problems associated with impact on nesting birds is unlikely to be classed as an emergency, a specific licence could be applied for. Several stated that individual licences could be issued where a problem arose.

Private Citizens: There were a mix of opinions within this sector which were quite polarised; concerns raised about killing Lesser black-backed gulls and those who believe that the species is detrimental to a range of ground nesting birds. Many suggested that poor quality habitat has led to a decline in waders, not purely predator activity. Specific licenses should be used where there is a proven issue.. Several highlighted the declining population of Lesser black-backed gulls in the UK/Ireland. General licences of this type do not exist elsewhere in the UK

Jackdaw

Academic: General licences of this type for this species do not exist elsewhere in the UK and N. Ireland should follow this example. Specific licensing used only where a serious problem has occurred.

Agriculture: Concerns about the impact of Jackdaw on nesting birds. One mentioned disturbance of nesting Barn owl by Jackdaw. Specific licensing used only where a serious problem has occurred.

Animal Welfare: Respondents highlighted that there should be higher ethical bar for the killing of any animal. No evidence of any threat to birds or mammals from Jackdaws. The remainder took a zero tolerance approach to the killing of any bird. One questioned the unrestricted geographical nature of the general licence.

Countryside Sports: Comments all referred to the impact of these birds on wildlife, including nesting raid and general disturbance.

Environmental Organisations: This species is not on the GB equivalent licences. Should the situation arise where a bird was causing an issue then an individual licence was more appropriate. No evidence that it is a problem species.

Fishing: Not viewed as pest or problem species.

Local government: No comments received.

Pest Controllers: One commented that as problems associated with impact on nesting birds is unlikely to be classed as an emergency, a specific licence could be applied for. Several stated that individual licences could be issued where a problem arises. General licences of this type for this species do not exist elsewhere in the UK.

Private Citizens: There was a mix of opinions within this category but the majority don't support its inclusion; General licences of this type do not exist elsewhere in the UK. Where there was a specific problem a licence could be considered. No evidence that Jackdaws are a serious threat to any other species.

Magpie

Academic: General licences of this type for this species do not exist in Wales and N. Ireland should follow this example. Specific licensing used only where a serious problem has occurred.

Agriculture: Concerns about the impact of Magpies on nesting birds. Several mentioned the removal of the species from the Welsh licence. Specific licensing to be used only where a serious problem has occurred.

Animal Welfare: General licences of this type for this species do not exist in Wales and N. Ireland should follow this example. No evidence that it is a problem species putting any other species in danger.

Countryside Sports: Comments referred to the perceived impact of these birds on wildlife, including nesting raiding and egg theft. Mentions of attacks on domestic hens and their eggs.

Environmental Organisations: This species is not on the GB (Welsh) equivalent licences. Should the situation arise where a bird was causing an issue then an individual licence was more appropriate. Some considered that there was no evidence that Magpie is a problem species, while comments were received referring to the impact of these birds on wildlife, including nesting raiding and egg theft. Several mention the impact of magpies on song birds.

Fishing: Not viewed as pest or problem species.

Local government: No comments received.

Pest Controllers: No comments relevant to this licence. Several stated that individual licences could be issued where a problem arises.

Private Citizens: There were a mix of opinions within this sector but the majority didn't support its inclusion. Reference was made to General licences of this type for this species not existing in Wales and that N. Ireland should follow this example. Where there is a problem a specific licence could be considered. Some considered that there was no evidence that Magpies were a serious threat to any other species. A number referenced nest raiding of hedgerow birds.

Feral Pigeon

Academic: General licences of this type for this species do not exist in GB and N. Ireland should follow this example. No evidence of this species causing a problem to other species.

Agriculture: No evidence of this species causing a problem to other species.

Animal Welfare: General licences of this type for this species do not exist in GB and N. Ireland should follow this example. No evidence that it is a problem species putting any other species in danger.

Countryside Sports: A mix of comments for and against. Comments refer to the impact of these birds on wildlife without explanation. Others suggest there is no evidence of this species causing a problem to other species.

Environmental Organisations: This species is not on the GB equivalent licences. Should the situation arise where a bird was causing an issue then an individual licence was more appropriate. No evidence that it is a problem species.

Fishing: Not viewed as pest or problem species in this context.

Local government: No comments received.

Pest Controllers: One reference that there was no evidence of impact on other species from feral pigeons.

Private Citizens: There are a mix of opinions within this sector but the majority don't support its inclusion; General licences of this type for this species do not exist in GB and N. Ireland should follow this example. Where there is a specific problem a licence could be considered. No evidence that feral pigeons are a serious threat to any other species.

Wood Pigeon

Academic: No evidence of this species causing a problem to other species. General licences of this type for this species do not exist in GB and N. Ireland should follow this example.

Agriculture: No evidence of this species causing a problem to other species. One reference (unspecific) that they do cause issues for other species.

Animal Welfare: General licences of this type for this species do not exist in GB and N. Ireland should follow this example. No evidence that it is a problem species putting any other species in danger.

Countryside Sports: A mix of comments for and against. Some comments refer to the impact of these birds on wildlife without explanation. No evidence of this species causing a problem to other species.

Environmental Organisations: This species is not on the GB equivalent licences. Should the situation arise where a bird was causing an issue then an individual licence was more appropriate. No evidence that it is a problem species.

Fishing: Not viewed as pest or problem species.

Local government: No comments received.

Pest Controllers: One considered that there was no evidence of impact on other species from Wood pigeons.

Private Citizens: There were a mix of opinions within this sector but the majority don't support its inclusion; General licences of this type for this species do not exist in GB and N. Ireland should follow this example. Where there is a specific problem a licence could be considered. No evidence that woodpigeons are a serious threat to any other species.

Rook

Academic: No evidence of this species causing a problem to other species. General licences of this type for this species do not exist in GB and N. Ireland should follow this example.

Agriculture: Some stated there was no evidence of this species causing a problem to other species. Others considered that they do cause issues for other species particularly nestlings.

Animal Welfare: General licences of this type for this species do not exist in GB and N. Ireland should follow this example. No evidence that it is a problem species putting any other species in danger.

Countryside Sports: A mix of comments for and against. Comments refer to the impact of these birds on wildlife. No evidence of this species causing a problem to other species.

Environmental Organisations: This species is not on the GB equivalent licences. Should the situation arise where a bird was causing an issue then an individual licence was more appropriate. Reference to the declining population status of Rook. No evidence that it is a problem species.

Fishing: Not viewed as pest or problem species.

Local government: No comments received.

Pest Controllers: One reference that there was no evidence of impact on other species from rooks.

Private Citizens: There were a mix of opinions within sector but the majority don't support its inclusion; General licences of this type for this species do not exist in GB and N. Ireland should follow this example. Where there is a specific problem a licence could be considered. No evidence that rooks are a serious threat to any other species.

Question 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?

514 individuals (27.31%) provided a response to this question.

While a large percentage of the responses could not provide any practical experience, there were a range of opinions relating to the usefulness of various non-lethal alternatives for bird control. There were frequent references to the use of 'gas-gun' noise makers for crop protection, which appear to have some limited effects for some species for this purpose. Several others referenced the use of scarecrows – both humanoid and predator shaped. There were several mentions of laser scarers which initially worked, but which subsequently were of little use as birds quickly habituated to them. Most responses indicated that scarers were not hugely effective or their effects were short lived. Several people referred to the use of building modifications to make structures less appealing to nesting birds, these methods typically being applied by professional pest controllers. There was a reference to habitat modification for the purpose of air safety. There were several references for and against the use of Larsen or Ladder Traps, regarding their deployment and effectiveness.

Question 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.

299 (15.89%) responses were received to this question. Answers were very similar to question 39, with several making reference to their previous answers. There were multiple references to the use of 'gas-gun' noise makers for crop protection, which appeared to have some limited success for some species. Several others referenced the use of scarecrows – both humanoid and predator shaped. Most responses indicated that these responses were not hugely effective or the effects were short lived. There were references to nest disruption and egg damaging by oiling. Several respondents referenced the use of building modifications to make structures less appealing to nesting birds, these methods typically being applied by professional pest controllers. There were several mentions of better animal husbandry methods to protect very young lambs. There was a reference to habitat modification for the purpose of air safety. There were several references for and against the use of Larsen or Ladder Traps, regarding their deployment and effectiveness.

Question 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?

1793 (95.27%) provided an answer to the question. 1467 (77.95%) said Yes and 281 (14.93%) said No.

A number of comments were critical of the wording of the question. Many comments highlighted that the legislation states that lethal control is the last resort, including some detailed responses demonstrating how the relevant sections of the Wildlife (NI) Order 1985 (as amended) were derived from the EU Birds Directive and its principles of lethal control as a last resort. There was some repetition of the comments from questions 39 and 40.

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

1852 responses (98.41%) within in that 265 (14.08%) answered Yes and 1579 (83.90%) answered No. The bulk of the negative answers highlighted that the other UK nations have some level of restriction on the use of General licences on qualifying designated sites, especially sites where birds were a selection feature or a supporting selection feature. There was acknowledgement that some predator control may be necessary on some sites to encourage ground nesting birds. Most respondents stated that a site-specific licence was appropriate for this purpose. Those calling for use of general licences within designated sites largely justified it by stating that they could mount an instant response when needed.

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

1790 (95.11%) respondents answered this question. With 93 (4.94%) saying Yes and 1680 (89.27%) saying No. Most people only gave a few words in the comments box for this question often referring the reader to their earlier comments. Most negative responders could not offer any practical experience. There were a number of references to protecting nesting waders in and around designated sites. A NGO cited extensive experience across a wide range of designated sites within NI. They found predator control necessary to protect and enhance populations of ground nesting birds, especially waders.

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

1307 (69.45%) answered the question. A wide range of opinions were expressed. A number of respondents asking for the implementation of Sunday Shooting in Northern Ireland, while others considered that the ban on Sunday shooting was something DAERA had got right. There were

also calls to run the licences 24 hours a day and permit night shooting. There were several suggestions for end users to have undertaken a gun safety and species identification course before being permitted to use the General Licence. There were various calls for the addition of other species on the TPG 2 licence including Great Cormorant, Canada Goose and Jay. There was a frequent call to following Wales and limit use of conservation general licence to breeding season and then only to protect a published list of species of conservation concern.

Some considered the General Licence mechanism to be a blunt instrument which was not fit for purpose because there was no underpinning scientific rationale provided for the need nor any assessment of effectiveness. These respondents called for it to be scrapped and replaced by a licence system that was underpinned by scientific evidence. Another called for a better register of professional pest controllers who are trained and licensed.

One respondent considered that designated sites were extra special and should not be places where unregulated, unmonitored, unjustified and unlimited killing of wildlife could take place. Several called for stronger penalties for those found guilty of committing wildlife crimes.

An agricultural organisation believed that DAERA's current General Licences were effective and practical in proactively giving farmers, landowners, conservationists, pest controllers and gamekeepers certainty that their necessary actions in control were lawful.

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

693 (36.82%) answered this question.

Comments to this were very similar to the two previous questions, eg, calling for Sunday shooting, asking for Jays and Great Cormorants to be added to licences. Some respondents highlighted the ability to take immediate action, considering General Licences being essential for farmers and pest controllers to protect crops.

Others called to abolish most aspects of the General Licensing system. Some highlighted their perception of a lack of science behind the lists, ie, any views about killing wildlife to protect wildlife were founded in anecdote and custom, rather than being based on science. There were also calls for a ban on lead shot, and more clarity and consideration over the use of non-lethal alternatives.

Conclusion

The responses and evidence provided from this consultation have been considered by the Department, alongside population statistics and conservation status of the listed species and all other relevant issues, to shape the general licences going forward.