

John F. Robins, Secretary, Animal Concern Advice Line (ACAL), c/o Animal Concern,  
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Animal Concern Advice Line (ACAL) is a recognised Scottish charity: No. SC030982.  
Animal Concern Advice Line was established in 2001 to take on the charitable work of Animal  
Concern which was founded as the Scottish Anti-Vivisection Society in 1876.  
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The Scottish Government has been asked to suspend a consultation on the killing of wild birds in Scotland. Early this year, in response to a threatened legal challenge from Chris Packham and the group Wild Justice, English Nature revoked open General Licences for the killing of many species of birds. In Scotland SNH refused to revoke the equivalent licences but promised a public consultation instead. Campaigners have condemned that consultation as “... a deliberate attempt by SNH to mislead Government, Parliament and the public.”.

The consultation will not address the controversial issue of people being permitted to kill unlimited numbers of several species of native wild birds simply by reading a Government Licence on the SNH website. Gamekeepers do not have to ask for permission, explain why they want to kill the birds or say whether or not they have tried non-lethal alternatives. They do not even have to record and report the number of birds they kill.

John Robins of the charity Animal Concern Advice Line states:

“SNH promised a consultation and gave us a whitewash. I believe hundreds of thousands of birds are killed every year for no good reason. Gamekeepers all but wipe-out local populations of native wild birds because they might eat the eggs and chicks of non-native pheasant which are intensively reared in pens and then released to be killed by paying guns. This is not acceptable in this day and age. SNH and the Scottish Government should be listening to the public who elect and pay them instead of pandering to a tiny minority of people with a vested interest and who still think Victoria is on the throne.”

EDITORS NOTES: Full details can be found below in our emails sent to relevant Government Ministers and all MSPs.

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Nicola Sturgeon MSP, First Minister,  
Roseanna Cunningham MSP, Cabinet Secretary for Environment, Climate Change and Land Reform,  
Mairi Gougeon MSP, Minister for Rural Affairs and the Natural Environment,  
The Scottish Government,  
Edinburgh

Dear Ms Sturgeon, Ms Cunningham and Ms Gougeon,

You will find below a copy of the email I sent to all MSPs, including yourselves, on Friday, regarding the current SNH consultation on General Licences to kill native wild birds in Scotland. After the equivalent General Licences were revoked in England and Wales earlier this year SNH promised to bring forward their 2020 consultation and left people believing this would be a full consultation into the killing of birds under General Licence. As I predicted this is most definitely not the case.

In their preamble to this consultation SNH state in bold: "We are not consulting on the principal of General Licences."

As fully explained in the email I sent you on Friday (copied below) this is NOT the consultation which was expected. I believe this is a deliberate attempt by SNH to mislead Government, Parliament and the public.

I request that the Scottish Government immediately suspend this consultation and arrange for a new consultation to be held to address the principal of the General Licence scheme and whether or not the unregulated and unrecorded mass killing of native birds by gamekeepers is acceptable in the 21<sup>st</sup> century.

Yours sincerely,

John F. Robins,  
Animal Concern Advice Line

Dear Member of the Scottish Parliament,

On 3rd May this year I wrote to you about the General License scheme for the killing of wild birds.

Some General Licenses had been suspended in England and Wales due to a challenge to the legality of those licences. The equivalent licences administered by SNH in Scotland were not suspended as SNH claimed they were different from those south of the border. SNH were asked to explain the difference. As far as I know, no explanation was given.

As I told you in May, for over ten years Animal Concern Advice Line has been asking for a review of the SNH administered General License scheme which allows the killing of an unlimited and unknown number of circa 22 species of native wild birds in Scotland every year. The number of birds killed probably easily exceeds 100,000 per annum and causes localised near extinction of some species.

SNH has since confirmed that they have no idea of how many birds are killed every year under the General License scheme. They also don't know who is killing the birds and why they are killing them.

What we do know is that under the General License scheme gamekeepers slaughter unknown thousands of native birds to artificially increase the number of non-native pheasants so that "sports" shooters can kill any of those pheasants that don't end up as roadkill or causing traffic accidents.

I also told you in May that we have asked successive Governments to review the General License scheme with a view to scrapping it as unfit for purpose. For years Ministers have been quite happy to believe SNH when they say the scheme is reviewed every year when in fact SNH only consult to determine what species should be removed from or added to this free-for-all exterminator's charter.

In May I asked Government Ministers to suspend all General Licences and I asked you to demand a full Parliamentary review of the General License scheme. Several of you did raise the matter with the relevant Government Ministers and directly with SNH.

Replying to questions on the General License scheme, Andrew Lee of the Scottish Government Environment and Forestry Directorate stated: "On 21st May SNH announced that they are bringing forward their consultation on general licensing, which was originally planned for 2020, to later this year." Roseanna Cunningham MSP used exactly the same phrase in a reply of 28th May to one of her constituents. In a letter of 12th June to Angela Constance MSP Cabinet Secretary Cunningham wrote; "SNH has decided to bring forward its consultation on general licensing planned for 2020 to this year."

However on 25th June, in a letter to Daniel Johnson MSP, Cabinet Secretary Cunningham made a subtle but very important change to her statement. She stated: "SNH has decided to bring forward its consultation on the general licences planned for 2020 to later this year and will be seeking information from interested stakeholders on the use of these licences..."

The consultation closes next Wednesday, October 9th. Due to pressure of work I have only today been able to look at the SNH consultation paperwork. On page two it states in bold type; "We are not consulting on the principal of General Licences. We are consulting on how the individual General Licences work, what they should cover and how they are worded or set out."

Just as I predicted, this is not, as many of you were misled to believe it would be, a consultation on General Licensing. It is the routine consultation on General Licences in which SNH ask gamekeepers and farmers what they want to shoot without restrictions and the large bird conservation groups what, if any, birds they want taken off the General Licences because of population decline.

This consultation will not even question the Victorian attitude which persists at SNH and which allows gamekeepers to kill unrestricted numbers of around 20 species of native birds to protect non-native, captive-bred pheasants which they release to be shot.

This consultation will not result in requiring gamekeepers and farmers to prove they have tried all humane deterrents before killing unrestricted numbers of around 20 species of native birds.

This consultation will not result in requiring farmers to provide one iota of evidence of crop damage or livestock injury before killing unrestricted numbers of around 20 species of native birds.

This consultation will not result in requiring householders to provide a good reason before they trap corvids in their gardens and then kill them by bashing their brains out against a wall.

This consultation will not result in bird cullers having to record the number and species of birds they kill.

This consultation is not fit for purpose and I ask you to raise it with the Government and to back our request for a long overdue consultation on the very principle of General Licenses.

Yours sincerely,

John F. Robins,  
Secretary to ACAL.