



By email: glevidence@defra.gov.uk

13 May 2019

Rt. Hon. Michael Gove MP
Secretary of State
Department for Environment, Food & Rural Affairs
General Licence Evidence,
Wildlife 1st floor,
Seacole 2 Marsham St
London
SW1P 4DF

RE: Call for Evidence, Bird Control Licences

Dear Secretary of State Gove,

I write to you in regards to your call for evidence for the impact of revoking the general licences on behalf of the British Pest Control Association (BPCA).

BPCA represents over 700 member companies with a professional interest in pest management. Our response has been written with full consultation of all our members.

All of our member companies who carry out pest management work (including bird control):

- Are verified as meeting strict membership criteria, meaning they:
 - only employ professionally trained and qualified technicians, and
 - have a minimum of £2 million public and products liability insurance
- Are audited to BPCA stringent quality standards and the EN 16636 European standard for pest management
- Agree to follow the BPCA and industry Codes of Best Practice.

The professional pest management community has been adversely affected by the changes to the general licences.

It is our members' responsibility to protect public health and safety and minimise the spread of disease through the use of pest management. This will include the lethal control of certain pest bird species - particularly feral pigeons and gulls.

New general licences for this purpose and these species have still not been issued.

We believe that the interim measures put into place by Natural England for applying for individual licences, for the most part, were adequate for our members to continue to protect public health and safety.

Natural England met with us and provided the assurances we needed to advise members how to continue their work quickly and legally.

BPCA has plenty of experience in communicating complicated changes to our members. However, given the tight timelines and lack of warning, we join the many voices agreeing that the change will compromise public health and bring disruption to businesses.

Many birds can very clearly fall under the category of “pest species” - ie “an organism in the wrong place”. Pest birds pose a very clear risk to public health and safety, as seen recently, when two patients at the Queen Elizabeth University Hospital, Glasgow were exposed to pigeon faeces and succumbed to a cryptococcus infection.

As per your request, we've broken our evidence into four sections:

1. Our views on the alternatives to killing or taking a specific bird species
2. Our evidence of the benefits that were delivered by the three revoked general licences
3. Our evidence of any problems caused by the three revoked general licences
4. Our evidence of any problems caused by the revocation of the three revoked general licences.

1. Our views on the alternatives to killing or taking a specific bird species

The core principle of pest management is to prevent a pest occurrence before it happens. Prevention work includes scaring techniques, bird netting and spikes, etc.

However, once a pest has entered a sensitive site, that site must be protected from the imminent threat to public health and safety as quickly as possible. Sensitive sites include:

- Food premises
- Important infrastructure
- Those near and including airfields
- Other domestic and commercial premises.

This will often mean that our members are left with no choice but to use lethal control. This is done alongside proofing and prevention work; not as a convenient alternative.

Once an infestation has occurred, there are very few situations where alternatives are viable. When pest birds enter food processing areas, there is obviously a risk of contamination and subsequently a risk to human health. A bird that has entered a building is distressed and cannot usually find a way out.

Control needs to be achieved swiftly to minimise the risk of contamination and avoid the bird from inhumanely suffering and ultimately dying of starvation. Pest management professionals are bound by stringent legislation and our members adhere to Codes of Best Practice to ensure all lethal control is achieved humanely.

Once a nest has been established on a rooftop, non-lethal control is usually no longer practical or safe. An egg and nest removal programme is then usually the only way to control the birds, prevent damage to buildings and protect people while working on these areas.

Managing a stable colony of gulls nesting on roofs of buildings by egg removal rather than allowing uncontrolled population growth is an important way we ensure colonies and the health risks associated with those don't get out of hand.

Proofing a building with nets can work well to prevent access to the building by feral pigeons. To install the nets, squabs and eggs in nests, and sometimes adult feral pigeons currently on the building, need to be culled to prevent adults getting caught in the net and squabs being inaccessible to parents.

When feral pigeons are excluded from one area by proofing they will inevitably remain as near to the nest site as they can, increasing the risk to public health. Again, in this situation, there is no alternative to lethal control.

Many of our members protect essential sites and equipment for British infrastructure, for example telecom and water treatment sites. When a bird infestation occurs in one of these sites:

- Equipment gets covered in droppings
- Cable trays are used for nesting
- Old buildings, where equipment is housed, gets contaminated.

This puts service personnel at risk and could lead to the damage of essential infrastructure. In these situations, there is no alternative to lethal control.

On specific "alternatives" listed there are some practical implications that need to be considered:

- Nets are an excellent system that will keep birds off some buildings if properly installed, though are cost prohibitive when used over very large areas such as above a roof to prevent gulls nesting or below a roof to prevent feral pigeons from roosting. They can also hinder maintenance.
- Spikes are available that work well in many ledge situations, though not all. They can be prohibitively expensive if used extensively.
- Electric deterrents work well in many ledge situations but can be cost prohibitive.
- Bird wire can only work in places not used for nesting or roosting and only against feral pigeons and gulls.
- Repellent gels can work in some ledge situations, but are relatively short-lived.
- Strip curtains can help to reduce feral pigeon entry, but there are many situations where they are futile or dangerous, for example, large doorways in windy locations where doorways are frequently used.
- Ultrasonic systems are ineffective due to bird hearing range being the same as humans, limiting their effectiveness.
- Sonic systems have limited uses due to habituation.
- Visual deterrents (such as plastic birds of prey) generally do not work, though some devices such as kites can be useful as part of a strategy.

Ultimately, only a professional pest management company with the right experience and training can decide what measures will work in each situation.

A professional will balance all these considerations (and many more) before carrying out lethal control.

Pest management professionals must be empowered with appropriate licences to make these difficult calls.

2. Our evidence of the benefits that were delivered by the three revoked general licences

The three general licences allowed our members to use their professional judgement to conduct essential bird management, without fear of breaking the law and in the interest of protecting public health and safety.

There are many situations where proofing or deterrents are either not practical or are cost prohibitive.

The old licences allowed a professional to deem the most appropriate course of action immediately, including culling, allowing for more expedient control thereby minimising public health and safety risks.

We believe the professional judgement of a proficient, trained and experienced pest management company, like a BPCA member, should be enough to satisfy the condition that all other bird management options have been exhausted before lethal action is taken.

3. Our evidence of any problems caused by the three revoked general licences

The revoked general licences were generally fit for purpose for our members.

We believe that the broad nature of the licences may have allowed for those without the relevant training, experience and competency (amateurs) to lethally control pest birds with impunity.

In future updates to bird control licences we hope the training, continuing professional development (CPD) and experience of a professional will allow them to be able to continue to use lethal control, as a last measure, as they have done previously under the general licences.

We are not opposed to there being restrictions on those that can't meet that strict criteria.

4. Our evidence of any problems caused by the revocation of the three revoked general licences

The way in which the licences were removed meant that the professional sector was unsure about how to proceed with essential lethal control legally.

Work has been postponed or cancelled. Egg removal programmes will have ceased in some cases.

Our members businesses will have suffered, however more importantly public health and safety was put in danger.

We believe that Natural England had very few options, and have worked hard to ensure our members can continue their integral work.

We only wish we'd had more time to prepare our members and the professional sector for the changes, and that the infrastructure for simplified individual licences was fit for purpose from the day the licences were revoked.

We hope we can support future changes to licences to make sure that the protection of the UK's wildlife is balanced against the need to protect public health and safety.

Thank you for giving us the opportunity to provide our evidence and point of view. We hope that Defra will prioritise getting general licences ready for feral pigeon and gull control for public health and safety so our members can achieve effective and timely control.

Yours sincerely,



Ian Andrew

Chief Executive Officer
British Pest Control Association