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Natural England licence the taking of wild Peregrine Falcons

Dear Lord Goldsmith of Richmond,

The Northern England Raptor Forum [NERF] is a collaborative organisation of ten Raptor Study Groups monitoring and protecting birds of prey in the North of England. Our combined study area stretches across the length of the Pennine Chain from the South Peak to the Scottish border, Cheshire, the Forest of Bowland, Manchester and the Friends of Red Kites Project in Gateshead. The Yorkshire Kites Project and the Shropshire Raptor Study Group are Associate Members. Collectively we are the largest group of licenced Raptor Workers in England.

NERF is a founding member of the Police led Raptor Persecution Priority Delivery Group [RPPDG], we have previously participated in the Government's Hen Harrier Dialogue, the Buzzard Working Group and were partners in the five-year Hen Harrier Life Plus Project which ended in 2019. NERF is a recipient of the Partnership for Action Against Wildlife Crime, Partner of the Year Award and our organisation has been commended for our work by Superintendent Nick Lyall, Chair of the RPPDG. We are active participants in Operation Owl, the Police led campaign to prevent bird of prey persecution.

NERF is dismayed to learn that Natural England have licenced three falcon breeders to take 12 Peregrine Falcon chicks from the wild over the next 2 years. It is NERF's opinion that the issuing of these licences cannot be justified on conservation grounds; there are no benefits for the Peregrine Falcon population to be gained from this scheme.

The UK Peregrine population is stable overall thanks to the increase in the urban population and it is not under the threat of collapse such as we saw when the use of DDT devastated the species in the 1950s. We further believe that successful breeding of captive bred Peregrines is able to fulfil the needs of UK falconers and the removal of wild birds to supplement the industry is unjustified. NERF is preparing a fuller response to this unsatisfactory situation, which we will make available in the near future.

Due to the Covid-19 pandemic the country is in lockdown and our members, who also hold Wildlife and Countryside Act licences to both disturb and ring birds, including Peregrine Falcons, have been told by the BTO that our licences are suspended for the foreseeable future. The voluntary work undertaken by ringers and nest recorders is the bedrock on which all of ornithological data gathered on behalf of the UK Government is based. Without this vast army

of volunteers the Government would not be able to fulfil its obligations under the European Birds Directive.

One justification for the BTO's decision is that ringing activities do include an element of risk and an accident could potentially put the emergency services, including Mountain Rescue Teams, and medical services under unnecessary extra strain in these very difficult times. Abseiling or climbing into a Peregrine eyrie is a risky operation, even for experienced climbers or qualified rope access professionals and in the current circumstances it is understandably prohibited by the BTO and discouraged by the British Mountaineering Council. Accessing a Peregrine eyrie is an activity that should only be undertaken with a partner, I have considerable experience both as a rock climber and a qualified rope access supervisor and I have been involved with ringing Peregrines for over two decades; it is impossible to maintain physical distancing during this activity. In the event of an accident occurring whilst the climber is on the rope(s) rescuing the casualty is both difficult and complicated and rope access professionals commit a great deal of time practicing these techniques. The majority of amateur climbers would require significant professional help to rescue an injured individual.

Gary Wall, the spokesman for the licensees, has stated that this project is designed to conserve the pure bloodline of native Peregrines and he goes on to state that this scheme is not a 'business'. Therefore the journeys to take these birds from the wild are not 'essential' as defined by the current guidelines and should not be made under the current travel restrictions.

The constraints that have been imposed on Raptor Workers to protect the NHS and to save lives during the Covid-19 are unlikely to be lifted in the near future. Consequently NERF believes that the same conditions should be applied to the licensees and that Natural England should suspend the licences to take Peregrine Falcon chicks from the wild during 2020. If Natural England permits this scheme to go ahead at the present time we believe that they will be facilitating breaches of the Coronavirus Act 2020 and the Government's own guidelines.

It is within your gift to stop this now. It is the responsibility of the licenses to 'stay at home, protect the NHS and save lives' and it is Government's responsibility to ensure that they do so.

If these licenses are not suspended now the chicks are likely to be taken before the end of the month, well within the Covid-19 lockdown period.

I look forward to your early response.

Yours sincerely

Steve Downing

Chairman
Northern England Raptor Forum
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