

Wildlife Management Strategy Consultation
Defra
Wildlife Species Conservation Division
Room 108
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6NE

Dear Sir/Madam

19th September

**Countryside Alliance Submission on the consultation for:
Ensuring the sustainable management and conservation of wildlife – towards a Wildlife
Management Strategy for England**

The Countryside Alliance welcomes the opportunity to submit comment on the Defra Consultation: Ensuring the sustainable management and conservation of wildlife – towards a Wildlife Management Strategy for England. The Countryside Alliance is a campaigning organisation covering the whole of the United Kingdom and works for everyone who loves the countryside and the rural way of life. As a membership organisation representing 250 000 people, we reflect the views and concerns of a broad range of rural people and their livelihoods.

The Alliance welcomes the aims of the wildlife strategy and supports, in principal, the decision tree as a framework for wildlife management decision making. We support the Government's ambitions to bring together ad hoc wildlife policy - making it consistent and holistic. However, we are concerned that a number of areas have been overlooked which could threaten the efficacy of this strategy. These include the strategy having an England only remit and the omission of the development of an independent expert body to investigate the existence of, and solutions to, wildlife management situations.

We believe that as wildlife does not respect national borders in relation to emerging issues, such as disease out break and climate change the strategy must be tailored to be applicable on a Great Britain wide scale. More importantly, the existence of an independent expert body would allow potentially difficult wildlife management decisions to be made in an accountable, transparent manner and free from political expediency.

Should you require any further clarification of the points raised in our submission please do not hesitate to contact me.

Yours sincerely



Simon Hart
Chief Executive, Countryside Alliance

Question 1 Do you agree with overall aim of the Wildlife Management Strategy?

In principal we support the development of strategy which brings together ad hoc wildlife policy that in some cases fails to reflect and deliver on the environmental and social challenges of today's countryside. We agree that a wildlife strategy must be consistent and aligned to Defra's aims and objectives. The Alliance would welcome particular focus on the objectives of developing policy to ensure strong rural communities and a healthy, resilient, productive and diverse natural environment. Human/wildlife conflict situations can reduce the viability of businesses whose income is land based. While the welfare and conservation status of a species are paramount, the sustainability of rural enterprise must not be overshadowed by this because the two are not always mutually exclusive.

Within this context, we feel that the internationally recognised conservation principal of 'sustainable use of wildlife' should play a greater role in helping the Government achieve its objectives and ensuring the success of this wildlife management strategy and other species specific management plans. There are a number of international and national case studies which show that by giving wildlife a value it can encourage its conservation – provided the uses are well defined through regulation and property rights.

In a national setting, the Government should consider the success of deer management in the UK, where the central principal of preserving healthy numbers of deer species is the 'sustainable use of wildlife'. Not only has the effectiveness of this management approach been demonstrated at a species level, it's value as a source of tourist income has been realised at the local level, and as a healthy food at the international, national and local level.

We welcome the Government's acknowledgment of the role of game management in conservation. However, we believe this strategy provides an opportunity to mainstream the principals of 'sustainable use of wildlife' and replicate the success of the deer management example with a number of species involved in human/wildlife conflict situations. We would therefore strongly support the use of the conservation principal 'sustainable use of wildlife' within the strategy as an efficient tool for managing wildlife/human interactions.

The Alliance would wish that any new wildlife strategy would not duplicate existing legislation and/or policy and would not place any additional burden on landowners as a result of new strategy conditions. We agree there should be a clear rationale for government intervention in wildlife conflict situations, and that intervention is not just based on cost – benefit analysis but on sound available evidence, multiple stakeholder needs and Defra's second departmental strategic objective, "A healthy, resilient, productive and diverse natural environment."

Question 2

a. Do you agree with the overall scope of the Wildlife Management Strategy?

We understand that at this stage the strategy focuses on developing a policy framework for wildlife management applicable generally, rather than focusing on a set of actions for specific species. While we welcome a more integrated, holistic, approach to policy development, every wildlife/human interaction is slightly different and may require a set of policies to deal with species specific issues. Therefore the Alliance would advocate that during the consultation specific wildlife management issues are tested within the draft Decision Tree to assess the efficacy of the framework. We believe that if Government envisages this strategy to be a useful tool, regardless of whether it intervenes, then stakeholders require confidence that a policy framework can generate evidence based consistent outcomes to wildlife management situations.

One major flaw we believe undermines the aim of this strategy is that wildlife management has been stated as a 'devolved issue'. We understand that there are complexities dealing with this strategy in a Great Britain wide context because of devolved wildlife legislation – but wildlife won't respect national borders in emerging issues such as disease outbreak and climate change. The Alliance believes that for this strategy to work it must take account of cross-boarder issues and work closely with devolved bodies to make it applicable across the whole of Great Britain and its wildlife.

While the Alliance agrees that appropriate welfare issues associated with any human intervention be considered, we would not wish any additional burden in the form of regulation when considering such welfare issues.

Question 3

a. Do you agree with this assessment of the advantages of the Strategy?

Yes. However if the Strategy allows for exploring the rationale for cost sharing the Alliance feels stakeholders should be given a central role in decision making processes, and that negotiation on responsibilities and costs be made in a consistent, fair and transparent way. The Alliance advocates that the success of any strategy depends on effective stakeholder engagement and confidence. Therefore we would strongly support that the Strategy allow for the establishment of an independent expert body to be given budgetary control of, and statutory powers on, specific wildlife management issues –this would allow decisions to be made in an objective, accountable and transparent fashion free from political interference.

In principal we agree with the Government that intervention be carried out where essential and likely to result in a beneficial outcome. However, we would welcome clarity on what the Government deems as being an 'essential' intervention and who it specifies to be the recipients of a 'beneficial outcome'. As it stands the final advantage point of the Strategy could be open to interpretation, but by setting criteria to define these terms all stakeholders will be clear about the decision for Government to intervene.

Question 4

a. Is the use of a decision tree appropriate in reaching decisions on developing wildlife management policy?

a. Yes, the framework for decision making and policy development with respect to wildlife management appears logical.

Question 5

a. Do you agree that these are the issues that should be considered when deciding whether Government intervention is appropriate?

a. These issues should be considered. But before consideration of the issues the Alliance believes that a scientifically robust evidence base is needed to illustrate the actual existence and nature of a specific wildlife management issue, which in turn will allow decisions on any Government intervention to be made. Again, the Alliance would strongly support that an independent expert body be charged with assessing the rigor of available evidence and appropriateness of Government intervention.

Question 6

a. Do you agree that these are the main areas of evidence and or expert advice which are likely to be needed in most cases?

a. Yes

Question 7

a. Are these the right actions we should be considering when deciding on developing a policy on Government intervention?

a. Yes these are the right actions to consider.

b. The Alliance believes that it is not only in the delivery of decisions where stakeholder engagement is essential but in all actions and would strongly support such an approach. Whether it be developing new legislation or communications, stakeholder engagement at all stages of the decision making process is essential for the success of any wildlife strategy where actions have the potential to impact them.

In addition, where an action requires delivery through partners, stakeholders must be fully engaged in decision making regarding the approach to particular wildlife management issues and the likely responsibilities of such an approach. We would encourage that the Government should, in the case where a policy requires delivery through partners, estimate costs and time frames and develop a budget and project management plan for such delivery. The Alliance would not welcome additional financial burden being placed upon stakeholders as a result of partnership delivery for a wildlife management issue.

Question 8

a. Do you agree that these considerations should be a key element in deciding whether or not Government should get involved in a wildlife management situation?

a. Yes.

However, we would strongly support that such considerations and final decisions on a wildlife management course of action be made by an independent body of experts with Government representation, rather than by Government alone. The Alliance advocates that a properly funded and empowered independent body would be best placed to assess the available evidence and act objectively in light of this evidence. It would also be accountable for the outcome of wildlife management decisions which allows it to be free from political interference. We would welcome that this body be given statutory powers to make legislative change where a wildlife management action required such change.

Question 9 is this the right approach to monitoring outcomes?

Yes

Question 10

a. Do you agree with the relevance and appropriateness of these roles for stakeholders?

a. The Countryside Alliance welcomes the Government's proposals for the roles of stakeholders, 'As catalysts for policy initiation' and in 'policy delivery'. However, the Alliance strongly supports stakeholders playing a greater role in policy development and decisions to ensure the success of wildlife management strategies.

Successful wildlife management policies rely, in part, on the stakeholder representation and the expertise that each offers on different areas of wildlife management. We strongly advocate the establishment of independent expert bodies with stakeholder and government representation, within the Wildlife Management Strategy to make policy decisions in a transparent, consistent and objective way. Managing human/wildlife conflict situations can illicit emotive reactions and strong opposition from the public, an example being the prevention and control of bovine TB, which can impede evidence based decisions being implemented. In these situations, if the Minister is accountable to the public there is a danger that decisions based on objective criteria could be undermined by political expediency - creating an independent body would reduce this current limitation and result in better species management.