

John F. Robins, Secretary, Animal Concern Advice Line (ACAL), c/o Animal Concern, Post Office Box 5178, Dumbarton G82 5YJ. Tel 01389-841111. Mobile: 07721-605521.

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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Roseanna Cunningham MSP,  
Cabinet Secretary for Environment, Climate Change & Land Reform,  
The Scottish Government,  
St. Andrew's House,  
Regent Road,  
Edinburgh EH1 3DG

Dear Cabinet Secretary Cunningham,

To be perfectly honest I had not thought it worth replying to the response (below) I received from John Gray of the Wildlife Management Team of the Natural Resources Division of the Directorate for Environment and Forestry of the Scottish Government in respect of my e-mail to you of 17th July this year. The very fact that the Scottish Government has a Wildlife Management Team and not a Wildlife Conservation or Wildlife Protection Team shows just how biased the Government is towards agencies and commercial concerns whose wildlife management tools include guns, snares and traps.

In my e-mail to you I expressed my concern at bias in Government appointed stakeholder groups advising on animal issues. In his reply Mr. Gray raised the matter of the Partnership for Action Against Wildlife Crime in Scotland (PAW) and suggests that excluding certain partners from PAWS would not be a good idea. In his next paragraph Mr. Gray finally answered the question I have asked on several occasions previously when he clearly states that one of the stakeholder partners in PAWS, the Scottish Gamekeepers Association, has expelled members for committing wildlife crimes. He then stated; "The expulsion of members from a membership based representative body is not a matter for the Scottish Government, but for that organisation.". I beg to differ. It surely is a matter for the Scottish Government when an organisation advising the Government on wildlife crime has had to expel members for committing wildlife crime? Can you tell me how many Members the SGA has expelled in the last five years and for what reasons were they expelled?

I would also point out that PAWS, like previous stakeholder groups advising the Scottish Government, has a heavy bias in favour of organisations which exploit and persecute animals. I think I am right in saying that of the current 29 members of PAWS there are 14 bodies involved in killing animals for sport or have actively culled or promoted culling of various species, 11 organisations which are neutral on the killing/culling issue and only 4 which oppose killing for sport or culling animals.

Mr. Gray confirms that the Government is not going to introduce interim protection for beavers until a decision is taken on whether or not they have a future in the wild in Scotland. Studies have proved that lactating beaver are being killed leaving their kits to starve to death. You have the power to stop that happening yet have decided not to, why? Please tell me who, if anyone, is advising the Scottish Government on the beaver issue? If necessary please regard that as a request under Freedom of Information legislation.

Similarly on the banning of wild animals from travelling circuses can you please tell me who, if anyone, is advising the Scottish Government on this? Again, if necessary please regard that as a request under Freedom of Information legislation.

From what Mr. Gray has said Government is not going to ask those seeking licenses to cull ravens to supply carcasses of lambs they believe were killed by ravens so that actual cause of death can be determined. I think this is a mistake. Can you tell me what reasons SNH will accept as justifying the issuing of a license to shoot ravens? Again, if necessary please regard that as a request under Freedom of Information legislation.

As in previous replies from the Government Mr. Gray has suggested I respond to the current consultation on the General Licenses for 2017. That consultation is only on the technicalities of the 2017 licences. Can you tell me if the Scottish Government will consider holding a specific consultation into whether or not the General License system is fit for purpose?

I look forward to your reply in due course.

Yours sincerely,

John F. Robins,  
ACAL

Email from John Gray of the Wildlife Management Team of the Natural Resources Division of the Directorate for Environment and Forestry of the Scottish Government:follows:

Our ref: 2016/0023653

1 August 2016

Dear Mr Robins

Thank you for your email of 17 July 2016 to Roseanna Cunningham MSP, Cabinet Secretary for Environment, Climate Change, and Land Reform, regarding various animal related matters. I have been asked to reply.

In your letter you raised a concern over the bias in stakeholder groups which advise the Scottish Government. Part of the strategy to tackle wildlife crime in Scotland is via the Partnership for Action Against Wildlife Crime in Scotland (PAW Scotland). This Government led group of stakeholders rightly includes conservation NGOs, land management organisations and law enforcement bodies. We believe that tackling wildlife crime requires input from all of the relevant stakeholders in this area and PAW Scotland is the right forum for that. Changing attitudes and driving change requires involvement across the board and excluding certain partners will not help to bring about the change that is required.

Turning to your point about members of the Scottish Gamekeepers Association (SGA) having been convicted of wildlife crime, I can confirm that we are aware that there have been members expelled from the SGA in the past. The expulsion of members from a membership based representative body is not a matter for the Scottish Government, but for that organisation.

You also mention protection for beavers. The potential formal reintroduction of beavers raises complex issues around their management and legal protection. Scottish Ministers are considering these issues carefully before making a decision on the future of beavers in Scotland later this year.

Mr Walker's letter of 7 July 2016 informed you that the best mechanism for introducing a ban on the use of wild animals in circuses on ethical grounds was under investigation. The introduction of the ban will require legislation to be prepared and approved by the Scottish Parliament. While timetabling of legislative proposals rests with the Scottish Parliament, the Scottish Government will seek to introduce legislation as early as possible.

It is expected that the legislation approved by the Scottish Parliament will define the type and scope of any animals to which a ban will be extended. Whilst the current administration is not bound to the decisions of a previous administration, it may interest you that the consultation document of 2014 noted that the second session of the Scottish Parliament committed to "ban the use in travelling circuses of certain non-domesticated species whose welfare needs cannot be met satisfactorily in that environment".

Scottish Natural Heritage (SNH) can grant licences to permit the killing or taking of wild birds, including ravens, for the purpose of preventing serious damage to livestock. Evidence of serious damage occurring, or likely to occur, must be provided before consideration will be

given to granting a licence. Before considering a licence application, SNH will have to be satisfied that the applicant has tried other scaring techniques and found them insufficient. Licences to shoot ravens are granted only where there is no other satisfactory solution.

You also ask if the Scottish Government will consider holding a review in to the overall policy of the General Licensing system. As you are aware, SNH are currently holding a consultation on all aspects of licensing and I can only suggest that any comments you may have on this should be passed to SNH. Details on how to submit comments on their consultation can be found on the SNH website here

<http://www.snh.gov.uk/protecting-scotlands-nature/species-licensing/bird-licensing/general/general-licensing-consultation/>

Yours sincerely

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