

Parliamentary Under Secretary of State
Department of Environment, Food and Rural Affairs
2 Marsham Street
SW1 1PD

14th March 2024

Dear Lord Benyon, Lord Miller

Re: English Seabird Conservation and Recovery Programme (ESCaRP) Roundtable and Highly Pathogenic Avian Influenza (HPAI)

I write as Head of UK Marine Policy for the RSPB and the Chair of Wildlife and Countryside Link's Marine Group to extend my thanks for an excellent discussion last week on the English Seabird Conservation and Recovery Pathway (ESCaRP) and measures to reduce the impact of Highly Pathogenic Avian Influenza (HPAI) on UK seabird populations.

I strongly welcome the Government's decision to boost funding for iPREPARE which will significantly increase research and monitoring efforts of avian flu in wild birds. However, further action is needed to help mitigate the impacts of HPAI on our seabirds and I look forward to new data from the HPAI Seabird Survey Report being used to speed up the implementation of measures within ESCaRP. For example, measures focused on ensuring predator and disturbance free breeding habitats will allow for increased geographical spread of seabirds, which is essential to building resilience against HPAI.

I also support the intention to update the 'Mitigation Strategy for Wild Birds in England and Wales,' but am disappointed that for a third time Defra did not seek input from eNGOs during its drafting. The Strategy fails to offer clear, practical measures on the ground including a lack of information on carcass removal and disposal or the meeting of government led forums for best practice knowledge sharing between organisations focused on HPAI in wild birds. This was only the second roundtable that has been held on wild birds and HPAI with ministers since the outbreak began.

The UK Government is failing to achieve Good Environmental Status for seabirds and has seemingly abandoned its Environmental Improvement Plan commitment to halt species decline. While ESCaRP should begin to turn the tide on this dire situation Defra must do more. The HPAI Seabird Survey Report offers the perfect opportunity to recognise HPAI as an additional significant human-generated threat for our already struggling seabirds and to deliver critical and urgent resilience-building actions to protect these species.

One immediate step forward would be a review of, and precautionary approach to licences issued by Natural England to control gulls and for taking gull eggs during HPAI outbreaks (or other population impacts). Recently published wildlife licence data issued by Natural England found authorisation to collect over 2000 black-headed gulls eggs in North Yorkshire in 2023 whilst birds were dying in their thousands and some 10 year lethal control licences for red listed gull species will not be reviewed until 2025, with no way of taking the population level impacts of HPAI into account.

With the rapid deployment of necessary offshore wind increasing the pressure on seabirds, it has never been more urgent for the Government to support impact recovery after outbreaks of HPAI. We require a Nature Positive Planning approach to renewables expansion which reforms the planning system to front load considerations of nature. This should include the delivering of a review of Special

Protection Areas (SPA) provision in the marine environment which remains outstanding for at least 49 species. This must be undertaken as a matter of urgency to support the acceleration of deployment of offshore wind to determine in particular key breeding and foraging areas for seabirds.

The RSPB and Wildlife and Countryside Link's Marine Group remain keen to work with you and your teams and would be happy to provide further information. I look forward to hearing from you soon.

Yours sincerely,

Kirsten Carter, Head of UK Marine Policy, RSPB