

06 January 2006

Wild Boar Consultation,
Wildlife Management Team,
European Wildlife Division,
Floor 1, Zone 10/D,
Temple Quay, Bristol,
BS1 6EB

Dear Sir/Madam

Thank you for the opportunity to comment on the DEFRA consultation on Feral Wild Boar in England. We have studied the documentation carefully and participated in several high level discussions on the issues involved. Defra is to be congratulated on the thoroughness of the thought that has been given to this difficult issue. Nonetheless we do not consider that there is a simple or straightforward answer. We believe that there may be more boars living in the wild than is currently acknowledged. This makes judgement about eradication uncertain and we have considerable doubts as to practicality.

In reality, if eradication is decided to be impracticable or undesirable, the best management response will be a mixture of all the options. Much will depend on those who own land colonised by boars as it will be them that decide whether to participate in collaborative management or eradication. It strikes us as unlikely that the Government will impose management or eradication in the face of significant opposition. There is no state infrastructure, such as exists in other European countries, for overseeing and, if required, imposing culls. The size of woodlands in Britain is generally much smaller than in many of the best areas for boar on the continent and the circumstances applying in UK are unique.

That being the case we believe that some landowners will favour eradication, others will be enthusiastic about seeing boars on their land and tolerate the down side impacts, and others will see boars as a harvestable resource of value. The balance between the three will vary depending on local land uses and habitats. Boars do not go well with pheasant and partridge shooting. But the differences of local opinion will make a unified response rather difficult to achieve. One of the first steps has to be that of encouraging local dialogue to enable sensible responses in line with what local communities want.

We are also aware that boar populations in other countries, after long periods of gradual expansion, have exploded exponentially once they have passed a certain point. We have seen what has happened in southern Sweden. It is not clear to us that that will happen in Britain but we feel that it is possible.

Accordingly, if eradication is not pursued for whatever reason, and given the likelihood that management, including local eradication, will inevitably be required whether boar remain localised at low numbers or increase and spread, we feel that the highest priority is for government to grasp the nettle and to ensure that there is a body of some kind appointed or

created with appropriate powers to ensure, as far as possible within the voluntary ethic, that action is both fit for purpose and based on the best possible information.

Given the uncertainties that exist, notwithstanding the excellent papers produced in support of the consultation, in both our collective knowledge of boar and their likely prospects and impacts in Britain, we feel that further consideration needs yet to be given to management strategies including eradication.

We are particularly keen to continue our discussions with the BASC members, who represent one of the largest stakeholder groups of shooters and managers of land and game rights in the country, to find out where the balance of informed opinion really lies.

In that light we have done our best to provide an interim response to your consultation but it should be regarded as provisional and we will be continuing our discussion within our membership – and will keep you informed of progress.

For background information BASC was founded in 1908 as the Wildfowlers Association of Great Britain and Ireland and is the UK's largest shooting association. BASC is constituted as an Industrial and Provident Society and has a membership in excess of 123,000. BASC acts as a representative body for sporting shooting in the UK. It aims to promote and protect sporting shooting and the well being of the countryside throughout the UK and overseas. It actively promotes good firearm licensing practice, training, education, scientific research and practical habitat conservation. BASC believes that all who shoot must conduct themselves according to the highest standards of safety, sportsmanship and courtesy, with full respect for their quarry and apply a practical interest in wildlife conservation and the well being of the countryside.

BASC's expertise in shooting matters is widely recognised and is routinely consulted by government departments and agencies (including the Home Office, DEFRA, LANTRA, The Health and Safety Commission) and other statutory and non-statutory bodies such as English Nature and the Countryside Council for Wales.

BASC has some 15,000 members who are actively involved in deer management and these individuals have the skills and in many cases the appropriate firearms to be directly involved with the management of feral wild boar populations.

Our detailed interim response is attached. We have used the format provided by DEFRA as an executive summary and have detailed the rationale behind our recommendations in the further comments section. We will of course be happy to discuss our comments further.

Yours faithfully

Alan McCormick
Deer Officer
BASC

FERAL WILD BOAR IN ENGLAND – 1

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Please refer to the consultation document for a full description of all options before completing this consultation response.

Where asked to indicate the priority of any particular option please record:

H for High priority, M for Medium priority and L for Low priority

SECTION A – FUTURE MANAGEMENT OPTIONS

Please record only one preferred management option, but indicate, with a tick, other options that you would consider and those that you would not consider.

(a) No direct Government management

(b) Eradication of all feral wild boar and feral pigs

(c) Eradication of feral pigs only

(d) Regional management of wild boar/ feral pigs

(e) Prevention of future feral wild boar population establishment

Preferred management option. Record priority as H, M or L	Not an option	Would Consider
		√
		√
		√
		√
		√

SECTION B – OTHER PROPOSALS

(i) DISEASE AND ANIMAL WELFARE

Please consider the following proposals concerning disease and animal welfare and use the tick boxes and comments box below to indicate your views. Please indicate whether you agree with each proposal and what level of priority you attach to it. *Please tick or record H for High priority, M for Medium priority and L for Low priority.*

(f) Clarification of the requirement for notification of the relevant diseases in feral pigs/wild boar, including the proposed Tuberculosis (England) Order.

(g) Modification of existing orders, such as Aujeszky’s Disease Order 1983, to make a clear requirement for notification in feral boar.

(h) Disease contingency plans should remain flexible enough to allow testing and possible emergency control measures where wild boar population density or other local circumstances suggest they may pose a risk

Agree with this proposal. Record priority as H, M or L	Not an option	Would Consider
H		
H		
H		

Comments

We believe that it would make good sense to ensure that notifications are effective in providing timely warning of any occurrence of any exotic or endemic disease. Disease contingency plans need to be flexible and efficient in minimising the effects of any disease outbreak. The emphasis should be placed on rapid diagnosis and destruction of infected stock and exclusion of feral boar, rather than on indiscriminate control of the boar population. The detailed reasons for us adopting this approach are contained in the further comments section.

Annex C – Consultation Response

FERAL WILD BOAR IN ENGLAND – 2

(ii) CHANGES TO LEGISLATION

Please consider the following proposals to amend legislation in England relating to wild boar. *Please tick or record H for High priority, M for Medium priority and L for Low priority.*

	Agree with this proposal. Record priority as H, M or L	Not an option	Would Consider
(i) Introducing a close season for feral wild boar between March 1st and August 31 st	H		
(j) Introducing a legal minimum firearms requirement for culling feral pigs/wild boar; a suggested minimum is .270 Winchester, 130-grain bullet and 2600 ft/lbs muzzle energy.	H		
(k) Removal of farmed wild boar and their hybrids from the Dangerous Wild Animals Act 1976 and making an order for the control of their keeping under the Destructive Imported Animals Act 1932. This would require regular inspection of all premises containing boar or hybrids by Defra inspectors.			√
(l) Introduce legal provision for the control of escaped feral animals.			√
(m) Consider adding wild boar to Schedule 9 of the Wildlife & Countryside Act 1981 to prohibit their release into the wild.	H		

Comments

We are willing to support a close season for mature female boar from March 1st to August 31st on animal welfare grounds to ensure that dependant piglets are not left orphaned. In line with previous we recommendation we would support the use of .270 calibre and larger rifles, with the appropriate muzzle energy, for the control of wild boar. We support adding wild boar to Schedule 9 of the Wildlife & Countryside Act 1981 to prohibit their release into the wild.

(iii) MONITORING OF FERAL POPULATIONS AND ESTABLISHMENTS CONTAINING WILD BOAR AND WILD BOAR/DOMESTIC PIG HYBRIDS

Please consider the following proposals concerning the monitoring of wild boar and the control of keeping in captivity. *Please tick or record H for High priority, M for Medium priority and L for Low priority.*

(n) Closer monitoring of existing farms containing wild boar and wild boar/domestic pigs, including the registration of all boar farms.

(o) Individual marking of all wild boar and hybrids on farms to ensure subsequent traceability.

(p) Defra should continue to record, collate and monitor existing populations and new escapes.

(q) Longer term monitoring of the effects of feral wild boar rooting on woodland and grassland flora should be undertaken to supplement the preliminary data so far available.

Agree with this proposal. Record priority as H, M or L	Not an option	Would Consider
		√
		√
		√
H		

Comments

We are not in a position to comment on restrictions or specific management practices within wild boar farms but we would support any monitoring and data collection on new escapes. Given the confusion as to the possible benefits of wild boar to conservation we support further monitoring and research in this area.

Annex C – Consultation Response

FERAL WILD BOAR IN ENGLAND – 3

(iv) PROVISION OF ADVICE AND GUIDANCE

Please consider the following proposals outlining the provision of advice and guidance on feral wild boar. Please tick or record H for High priority, M for Medium priority and L for Low priority.

(r) Advisory guidelines/literature should be produced to provide guidance to Local Authorities and others on minimising risks to the public (via direct aggression and RTAs).

(s) Advisory guidelines should be made available to the public on how to minimise the risk of potentially dangerous encounters with feral wild boar.

(t) Advice should be made available to land managers and others on feral wild boar, the problems they may cause, and their management.

(u) Advice should be made available to owners of premises with wild boar, on methods of containment, reporting escapes etc.

(v) Illustrated advisory material should be produced to aid hunters, gamekeepers, stalkers and others, in disease identification.

Agree with this proposal. Record priority as H, M or L	Not an option	Would Consider
H		
H		
H		
H		
H		

Comments

We strongly support this proposal to raise general awareness about wild boar and their ecology.

(v) ADDITIONAL COMMENTS

Please record any additional comments you may have in the space below.

This section contains further explanation of the rationale behind our recommendations.

Comments on future management options

We comment on the Future Management Options section by considering what we would consider to be the least favoured option first and our most favoured option last.

- (1) Treat feral pigs/hybrids and feral boar separately, eradicating all feral pig populations and culling all escaped feral pigs and hybrids but allowing the managed continued existence of feral wild boar populations.**

The only practical way to try to cull out what are believed to be hybrids is to make a visual evaluation prior to culling such animals in the field. Experienced managers of UK wild boar are of the opinion that there are so many varied coat colourations within herds of genetically pure wild boar to make this option impractical. The consultation documents issued by Defra also recognised this problem. The issue is further compounded by the habits of wild boar to wallow and their appearance in the field may be affected by the colouration of the soil. The contention that many of the wild boar living in England are in fact feral pigs, is not supported by the DNA testing that has been completed to date. We recognise the difficulties of success under field conditions and question whether it should be considered.

- (2) Eradicate all existing feral populations and cull all new escapees. This would aim to remove all individual wild boar and feral pigs as well as any new escapes.**

At a recent seminar on Wild Boar the consensus opinion from those who are currently managing these animals in England was that the numbers quoted by DEFRA and the distribution statistics were very inaccurate. Whilst it is appreciated that these stakeholders have not themselves conducted widespread census work they are basing their opinions on their own fieldwork and their network of contacts within their local area.

If the stakeholders at that meeting are correct then the time, resources and financial penalty for any envisaged eradication project will need to be revised and are likely to increase substantially.

During December 2005 about 100 wild boar were deliberately released in the Exmoor area and the police believe that animal rights extremists were responsible. Approximately 40 of these animals were either recaptured or shot and on 04 January 2006, ignoring expert advice, a large-scale movement operation was organised to try to drive the boar out of in a valley consisting of 12 individual farms. The aim was to push these animals back towards the open

pens from where they had previously been illegally released. About 100 individual volunteers, vehicles, mounted riders and quad bikes were utilised and succeeded in recapturing only one immature animal. This mammoth operation was a total failure and will have undoubtedly dispersed the freed animals even further around the surrounding area probably making any further coordinated exercises totally futile.

The author of this response is aware of a population of feral boar in Leicestershire which have not been included within the official figures and has very recently received a request for advice from a shoot owner in the Scottish borders who wanted information on how to control wild boar which were continually upending his pheasant feeders, even though they were attached to substantial stakes driven in to the ground to anchor them in place. It would be naïve to think that there are not additional areas in England which contain viable populations of feral boar of which DEFRA staff are still unaware.

We contend that the major hurdle to any eradication programme would be the requirement for landowner co-operation and the resistance to date seems to have stemmed from those with an opposition to any form of management by culling. In the future those landowners/managers with an interest in sporting shooting are unlikely to wish to co-operate with DEFRA staff who will require access in order to exterminate what is seen as by many to be a superb sporting quarry with substantial income potential.

Even if the eradication option was chosen and procedures were put in place to try to deal with future escapes the practicalities are daunting. In the future there is no doubt that boar will escape from farmed enclosures either through deliberate release or fences being breached through falling trees or branches. Any measures to deal with such incidents can only be successful if the animals remain on land holdings where the owners are prepared to allow access to DEFRA staff or others to try to recapture or cull the escapees. The best-prepared contingency plans will be of no effect if neighbouring landowners will not co-operate with requests for access.

The consultation paperwork has identified that DEFRA staff will not have any statutory right of access to private property unless there is a disease outbreak and emergency measures are required. BASC has doubts that access problems could be sufficiently overcome to ensure the success of any eradication campaign.

At the seminar mentioned above many stakeholders were of the opinion that there were major benefits in allowing a previously indigenous species, which had been introduced by default, to remain established in the wild and contribute to the wider biodiversity within the English countryside. There are further perceived benefits to woodland biodiversity by having resident wild

boar populations at a sustainable level, which will root and scarify the dormant seedbed on the woodland floor.

Any eradication programme is likely to be mainly reliant on live trapping in large cages and shooting over baiting stations. These methods are time consuming and the DEFRA documentation has stated that the cages primarily catch immature animals. Shooting is seen in Australia as ineffective for large scale control and further detailed research work is needed on immuno-contraception before it could be considered as an effective option, even as a complimentary method to other control strategies.

DEFRA have indicated that certain benefits would be derived from an eradication programme and these include:

The potential of increasing boar-related RTAs and the cost in money and human injury and death these are likely to incur would be eliminated.

This contention ignores that there are already between 30,000 and 50,000 deer related RTAs per annum and the populations of all six deer species in England are increasing. There are government sponsored research projects currently being undertaken to quantify the scale of the deer RTA problem and to look at mitigation measures. These projects and their findings will, by default, address any current or future problems associated with wild boar RTAs and a more positive strategy would be to broaden the remit of current research to specifically include wild boar.

The (albeit small) risk to humans of attack would be removed.

We agree that the potential risk is very small and all recorded instances of interactions with free ranging wild boar and members of the public could be considered as “close encounters” rather than dangerous attacks although the individuals involved probably did not realise it at the time. There is most definitely a requirement for a public information programme as most of the perceptions of the dangers posed by wild boar are unfortunately influenced by general ignorance about the animals and their habits.

- (3) No direct Government management on the existing established populations but prevent new populations becoming established. Assuming that the current levels of culling by land-owners and others continue, this lack of Government intervention would probably result in the slow expansion of the three existing populations, particularly those in Sussex and the Forest of Dean.**

This option is of questionable practicality for many of the reasons outlined in the two previous scenarios. This option will have to rely on some arbitrary line drawn around the existing core areas beyond which all existing and new populations will be eradicated. It will become very difficult to define what is an “outlying” population and what is the natural spread from one of the core areas especially if the boar breed and expand their range beyond the current expectations. The increase in range is expected to be slow but the strategy, if this does not happen, has not been explored.

As with the other two options, landowner cooperation will be essential to have an effective strategy and this is likely to prove to be impossible. This option can only work if DEFRA are aware of all existing populations and are quickly informed if new breeding colonies are in existence. It seems that this is not currently the case and there is no reason to assume that this situation will change in the future.

Some landowners may challenge what is seen as an illogical government wildlife policy, which will allow wild boar to exist and spread in some parts of the country and not to allow the same circumstances to prevail in others.

- (4) Manage existing wild boar populations on a regional basis: limiting spread in existing populations and preventing establishment of wild boar in some areas, particularly those with extensive populations of domestic pigs in outdoor units. This would effectively exclude wild boar, for example, from large parts of Yorkshire and East Anglia.**

This option would mean that if a farmer wished to commence a boar farming operation in an area that currently has large scale domestic pig breeding, he would either be forbidden to do so or would have to meet far more stringent containment standards than wild boar farmers in other parts of the country. There is no mention of any grant or financial assistance to enable such a farmer to establish such an enterprise with additional costs imposed upon him because of his geographical location and what he might consider to be discriminatory government policy.

This option has not considered what will happen within the current wild boar “core areas” if farmers wish to establish new large-scale pig rearing enterprises or any strategy for those which are already in existence.

Under this proposal if wild boar were present on an estate in North Yorkshire which also had a pig rearing enterprise then pressure would be brought to bear on the land owner to ensure that all the wild boar were culled but an estate in a similar position in Dorset would be considered to be in an acceptable position from a disease management perspective even if it's pig rearing unit was far larger than the one in Yorkshire.

Similarly, an estate in North Yorkshire or East Anglia with a high dependence on sporting shooting, which had a viable population of wild boar and was in "close proximity" to a pig rearing enterprise would be expected to allow access for DEFRA personnel to shoot or trap the boar under a voluntary eradication programme. Once again the official assumption is that landowners will willingly accept the loss of potential income by allowing access for such control measures and that supposition may well be incorrect.

This proposal has some merit from a disease management perspective but much of the associated detail that needs to be fleshed out and considered further. At the moment this option is not considered to be appropriate.

(5) No direct Government management on all current and future populations. This would probably result in the eventual establishment of boar populations in most suitable areas of England.

The current situation is that landowners and holders of shooting rights, in the areas where they are resident, are controlling the populations of free ranging wild boar. The considerable culling pressure in the current core areas has retained the populations at an acceptable level and the previously expected population growth has not materialised. Whilst wild boar have the potential to rapidly increase in numbers, this just has not happened so far in England.

Some landowners with viable populations of boar consider them to be a valuable sporting asset as they can generate fees from sporting tenants and the demand for wild boar meat currently exceeds supply. The current situation allows for a financial return, which helps to alleviate the agricultural or forestry damage caused by the resident animals.

As with the herding deer species, wild boar are transient and in addition are almost totally nocturnal with home ranges varying depending on essentials such as food supply, cover, and water. It is recognised that there may be those in agriculture who will be subject to damage during the hours of darkness and a licensing programme to allow shooting at night to control excessive crop damage should be implemented. The merits of extending these licenses to cover protection of the natural environment and public safety issues such as incursions on to airfields should also be considered.

The situation regarding conservation interests, RTAs and safety of the general public using woodlands for recreational purposes, has already been discussed in previous comments.

We recognise that the increased disease risk will be the main cost of following the option of no direct government management. We have discussed possible strategies in the next section of the consultation. The availability of suitable habitat will have a limiting effect on the further spread of this species.

We tend to the view that the only workable strategy for the management of wild boar in the future is to allow landowners or authorised persons to control their numbers in line with the management objectives for the estate, farm, forest or landholding where the boar are located.

Comments on disease and animal welfare section

Under the new EU Food Hygiene Regulations, all large game carcasses, which are being supplied to an approved game-handling establishment, have to be accompanied by a declaration from a competent person to the effect that the animal has been inspected and that nothing abnormal has been found which would preclude it from entering the human food chain.

The latest guidance from the FSA further states that in the case of wild boar carcasses the head (less the tusks) and the diaphragm must accompany the carcass, so that the official veterinarian can test it for trichinella.

We believe that it would make good sense to ensure that notifications are effective in providing timely warning of any occurrence of any exotic or endemic disease. Disease contingency plans need to be flexible and efficient in minimising the effects of any disease outbreak. We are of the opinion that it is appropriate to have a robust mechanism in place to monitor wild boar carcasses entering the food chain, sampling from the population in the immediate area to any disease outbreak, effective biosecurity measures and if necessary then exclude, trap/cull and continue serological sampling until the risk of spreading the disease has been reduced to an acceptable level. These procedures should be effective in allowing for the eventual removal of infected area restrictions. The reference material accompanying the consultation stated the following in relation to Foot and Mouth Disease:

“In western Europe there have been no reports of spill-over of virus from domestic stock to wild boar over the last 80 years, suggesting that it is rare and that the risk of infection of livestock by infected wild boar is very low. The Veterinary Risk Assessment at the time of the UK FMD epidemic (Defra, 2001) recommended that emphasis is placed on rapid diagnosis and destruction of infected stock and exclusion of feral boar, rather than on control of the boar population.”

We believe that this approach in relation to FMD could also be considered as an effective strategy to combat the risks caused by many of the other diseases which wild boar are susceptible to.

Comments on changes to legislation relating to Wild Boar

(i) Introducing a close season for feral wild boar between March 1st and August 31st

We support a close season for mature female boar from March 1st to August 31st on animal welfare grounds to ensure that dependant piglets are allowed to mature to self sufficiency. There is an issue with occasional second litters and any best practice guidance will need to address this issue especially for stalkers/hunters who may be culling in the field.

(j) Introducing a legal minimum firearms requirement for culling feral pigs/wild boar; a suggested minimum is .270 Winchester, 130-grain bullet and 2600 ft/lbs muzzle energy.

We support a minimum calibre of .270 for shooting wild boar. Some of these animals develop a large plate of cartilage, muscle and fat, which usually requires a deep penetrating bullet to humanely control mature specimens. We consider that shotguns of 12 bore or larger using a single projectile, can also be suitable under certain circumstances. Wild boar are not normally threatening to humans but if wounded by the use of inappropriate firearms or ammunition, then they have the potential to be far less predictable and therefore, we support this proposal with an addition for the usage of suitable shotguns and ammunition.

If the .270 requirements were adopted, we request that any guidance issued regarding suitable firearms, ensures that .270 calibre is emphasised as a minimum requirement. The preferred weapon in many continental countries is the 9.3 mm rifle which is very suitable and obviously a larger calibre. Previous experience with the police firearms licensing system would suggest that many licensing departments would try to compel applicants to opt for the smallest calibre, rather than the most suitable calibre available.

k) Removal of farmed wild boar and their hybrids from the Dangerous Wild Animals Act 1976 and making an order for the control of their keeping under the Destructive Imported Animals Act 1932. This would require regular inspection of all premises containing boar or hybrids by Defra inspectors.

We make no comment on this proposal.

(l) Introduce legal provision for the control of escaped feral animals.

During our discussions with DEFRA it emerged that this proposal is aimed at making wild boar farmers directly responsible for the costs involved with wild boar escapes from fenced premises and we do not comment.

(m) Consider adding wild boar to Schedule 9 of the Wildlife & Countryside Act 1981 to prohibit their release into the wild.

The current difficulties with the escape of wild boar into the wild have been compounded in some cases by assisted translocations or deliberate releases from farms. We support this measure, as it should help to restrict such incidences of intentional relocation.

Comments on monitoring of populations of feral wild boar

n) Closer monitoring of existing farms containing wild boar and wild boar/domestic pigs, including the registration of all boar farms.

(o) Individual marking of all wild boar and hybrids on farms to ensure subsequent traceability.

(p) Defra should continue to record, collate and monitor existing populations and new escapes.

We are not in a position to comment on restrictions or specific management practices within wild boar farms but we would support any monitoring and data collection on new escapes.

(q) Longer term monitoring of the effects of feral wild boar rooting on woodland and grassland flora should be undertaken to supplement the preliminary data so far available.

The reference material supplied with this consultation has highlighted the diverging opinions as to the conservation benefit of wild boar in woodland. One of the references provided stated:

4.33 English Nature does not currently have a formal policy in relation to feral wild boar but, at the time of writing, a draft position statement has been prepared. This supports the eradication of feral populations if they are predominantly *feral domestic pigs* and states that they (EN) will take a decision on eradication on their own reserves on the basis of whether or not the animals are causing damage to the conservation interest of the site.

However, if the animals are, “to all intents and purposes, wild boar” they recognise these as a native species with conservation value. They take the view that further information is needed on their possible impact and, at present, would not support their complete removal. If they are to be

retained as a reintroduced species they recognise that the population will need to be managed to reduce damage and maintain “a positive conservation benefit, particularly in woodland” (A. Mitchell-Jones, EN).

Given the confusion as to the possible benefits of wild boar to conservation BASC would support further monitoring and research in this area.

Comments on provision of advice and guidance

We strongly support this proposal to raise general awareness about wild boar and their ecology. Wild boar are a fairly new arrival within the English countryside and there would be great benefit in providing a range of guidance material and information for anyone who may be directly involved in their management or who may come across them whilst participating in leisure or work activity.

Please return your completed consultation response to the address below:

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