

██████████

Do you agree that common pheasant and red-legged partridge should be added to Part 1 of Schedule 9 of the Wildlife and Countryside Act 1981 in Wales?

This change would mean that releasing those species in Wales would need to be carried out under licence. Please give reasons for your views. - Adding to Schedule 9

Yes

If these species are added to Schedule 9, please give us your views on whether our proposed licensing approach would be effective and proportionate? - Views on proposed licensing approach

██████████ strongly agrees with this proposal. This is a proportionate and logical response to the issues laid out in the consultation document and its accompanying papers. Self-regulation will not work as here we are dealing with the shooting industry – a notoriously uncooperative group of people who promote self-regulation but rarely deliver it (eg on wildlife crime, moorland burning and lead ammunition use). The shooting industry always claims to be highly regulated whereas in fact shooting is almost unregulated across the UK with respect to many other European countries.

We have based the proposed general licence conditions for pheasant release on the recommendations in the GWCT guidelines for sustainable gamebird releasing. However, the guidelines do not include specific density thresholds for red-legged partridge and there appears to be less evidence on which to base conditions relating to partridge. We have used what evidence is available, and expert opinion, to propose conditions for partridge releases. These are either based on a density threshold linked to the area of cover crop provided, or on density per hectare of release pen (as with pheasants), depending on how the birds are released. We would welcome views on whether these proposals are appropriate and workable and whether they could they be improved. - Views on conditions for partridge release

██████████ generally supports the proposals but they need to be made tougher in order to build on lessons learned from the last few years in England – Wales should do better.

Enforcement and monitoring – the shooting industry cannot be relied upon to stick to new regulations, it is a notoriously conservative industry which is reluctant to change. NRW must ensure that monitoring and enforcement of compliance is in place. In England, Natural England has not carried out this function, and neither does Defra and so the regulations are not properly enacted.

██████████ has recently (8 June) started a legal challenge to the regime in England.

Use of general licences – ██████████ believes that instead of a general licence, these measures should be enforced through individual licences where anyone wishing to release gamebirds must apply for an individual licence. Such measures were not introduced in England but have now been imposed for releases close to many 'European Sites' partly as a response to the widespread prevalence of avian flu and well-founded concerns over the role of gamebird releases in exacerbating the problem through providing a very large reservoir of captive bred and released birds. Wales should move directly to this approach.

Reporting of releases – an individual licensing system would go a long way to providing information on numbers of birds released and their locations. Current measures, including the APHA poultry register, provide very little useful information on which to base future improvements to regulation.

Should Mallard releases be included in these measures? – at a time of avian flu, but in any case, why are not Mallard releases covered by these proposals?

Buffer area around sensitive sites – the 500m proposal is not based on the current scientific evidence. Gamebirds travel much further than this from release sites. Based on the current evidence ██████████ supports a buffer zone of 1km. The maximum distance travelled by released gamebirds (Pheasants) in the study by Turner (2007) was, on average, over 900m and this only considered the first three months after release – gamebirds can be expected to disperse further in the other nine months of their first calendar year, and beyond. It is a commonplace event whilst travelling in the countryside to see gamebirds far from any potential release sites – the 500m zone is not supported by evidence and is not fit for the purpose of protecting sites of conservation importance.

Will the proposals be sufficient to protect sites of conservation importance? – the English regulations largely ignored the impacts of gamebirds on reptile and amphibian populations, the effects of gamebird releases on mammalian predator populations, the indirect impacts on lead shot use and the impacts on avian flu transmission to poultry and to wild birds. In England stronger measures have recently been introduced (individual licensing near SPAs) which partly address the avian flu issue. Annex 3 of the consultation papers provides a long list of known or suspected impacts of gamebirds on wildlife of conservation importance and that includes reptiles and amphibians which were largely ignored by Defra. There is clear need for tougher regulations than were initially introduced in England and ██████████ strongly feel that NRW should introduce a larger buffer zone (1km) and individual licensing of releases as its starting point for effective regulation of harmful impacts of gamebirds on native wildlife.

Charging for licences – NRW and Defra have both moved to a position of regarding non-native gamebird releases as a wildlife conservation issue which must be controlled. The polluter pays principle should apply here and the eventual licensing system should not be a burden on the taxpayer. ██████████ supports individual licensing of releases and those licences should carry a charge. This can also be seen as a charge on the failure of the shooting industry to self-regulate over recent years and their opposition to any form of new regulation which will protect the environment.

The GWCT guidelines include a recommendation that no more than one third of woodland with game interest should be used for release pens. This is to ensure sufficient woodland remains that can benefit from habitat management activities. We would like to include this recommendation in our proposed general licence. However, we would prefer to be able to define what can be included in the calculation. Do you have suggestions for how this might be achieved? - View on including a limit on woodland used for pens

No, that would be ridiculous. ██████████ does not regard the GWCT guidelines as having taken sufficient account of new evidence or the current condition, and they were produced by an organisation strongly supportive of gamebird shooting. NRW should take a precautionary approach and assume that all impacts are worse than GWCT recognises.

Location and density appear to be the main factors influencing the environmental impact of releases, but we recognise that smaller releases in less sensitive areas are likely to present reduced risks. It may be appropriate that small gamebird releases taking place away from sensitive protected sites and their buffer zones are not subject to the same general licence conditions that apply to larger releases. Do you think this is something we should consider? Please give reasons - Views on taking a lighter touch approach for small releases

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We are interested that NRW keeps quoting such views from an organisation that is clearly not an independent one - that doesn't look like an even-handed position to us. NRW has plenty of scientists in its own ranks and externally who could give an independent and well-researched view.

NRW should take a precautionary approach and assume that all impacts are worse than GWCT recognises. In any case, these measures do not in themselves limit the scale of gamebird releases – if a woodland currently has release pens that occupy less than a third of the woodland area then increases in gamebird releases would be possible. This is not what NRW should be accepting. An individual licensing system and a 1km buffer would go some way to addressing this point.

Could the proposals affect opportunities for people to use the Welsh language?

- Welsh language considerations

Many small releases add up to the same cumulative impact as few large releases – it is the overall impact that NRW must address. ██████████ cannot see that this approach does anything other than complicate matters to the benefit of very few individuals and the potential disadvantage of the wildlife that NRW must protect.

Is there a way we can increase the use of Welsh or provide more opportunities for people to use the Welsh language? - If yes, please explain in the box below

Are there any aspects of the proposals that could disadvantage people in using the Welsh language? - If yes, please explain the effects and how they could be mitigated

Do you believe the proposals treats the Welsh language less favourably than the English language? - If yes, please explain in the box below