

4. 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

We do not believe that common pheasant and red-legged partridges should be added to Part 1 of Schedule 9 of the Wildlife and Countryside Act 1981 in Wales. This would ban the releasing of those species in Wales unless a licence is granted by NRW. With statements from the Climate Minister recently it is clear that the current Welsh Government is openly hostile to the game shooting sector and those people who work and partake in it, so we feel that any licensing system would be unfair and purposely made to be unworkable.

In addition to the Welsh Government's clear hostility to rural workers who are involved in game shooting and game management, there are several reasons why we feel licensing would be detrimental to biodiversity in Wales. The proposals mean that a licence can be changed or removed at any point, with no clear notice period or proposals for consultation with the game sector, which would simply make the proposal unworkable. Game management businesses and smaller shoots (those more local in their influence and rely on a smaller network of people) would not be able to commit to the costly and labour-intensive habitat and wildlife management that is proven to be beneficial to woodland, and species other than game. Game management activities are hugely important to the biodiversity of Wales, as in the rest of the United Kingdom and many shooting operations are continually creating habits for wildlife far beyond agri-environment scheme requirements and "nature" reserves. By planting game covers, managing existing areas of woodland for game, controlling predators, and providing feed at the hardest times of year, it is proven that game management activities are helping nature and wildlife, which NRW recognises in the consultation paper annex 3. If the proposal to ban the release of common pheasant and red-legged partridge were to be undertaken and a licence issued, there is always a threat (even if it is only a perceived one) of the removal or change to licence conditions. Landowners and shoot operators are less likely to invest in habitat improvement because their business or leisure activity could be fundamentally restricted or changed to make it economically impossible to operate. This in turn will have a negative effect to Welsh flora and fauna.

The mental health of Welsh nationals who are involved in game management will also be affected: the uncertainty that a licensing system will produce could have a catastrophic impact on those who rely on game shooting for income and social interaction, especially given the comments from the Climate Minister Julie James. In a debate on shooting's benefit to the Welsh countryside, the Minister refused to accept its positive role for people and nature. Instead, she said she does not think "killing for sport or for leisure is anything that any civilised society should support". The Welsh Government has made its views clear to our community, with Julie James stating in a letter to the members of the Aim to Sustain group that: "Welsh Government do not support the shooting of live quarry as a leisure activity." In the minds of people involved in game management activities in Wales, how can any

licensing system be trusted and not be simply used as a tool to discriminate against them and those businesses involved in it, including third party business such as hotels and shops?

Farm diversification is vital to keep our farms profitable in the most remote areas of Wales, and this could also be affected. The economic activity from shooting in Wales goes beyond the actual process of shoot days. Many Welsh farmers rear gamebirds for Welsh shooting as additional income, which is an important part of their business. Some also have bed and breakfast accommodation where shooting guests can stay during the winter months when it would otherwise be empty, and others provide part-time labour during the busy release time for game shoots around the country as well as on shoot days themselves.

Welsh nationals who work within the game sector in Wales will also have uncertainty with regard to their employment. [REDACTED] has already had requests from gamekeepers in Wales to help them find work in England for job security. These are Welsh families that feel they have to leave the country of their birth because of the uncertainty that a licensing system has created. Several of these gamekeepers are also Welsh speakers; if a licensing system does come into effect in Wales they feel that they will have to leave the country to support their families in their chosen career and vocation. There is no doubt that this will have a negative effect on the Welsh language and those who speak it because if they move out of Wales there will be little opportunity for them to speak Welsh and their children to speak the Welsh language outside of the family group.

Many third-party businesses which are indirectly supported by the game shooting sector will also suffer. Hotels, small catering businesses, taxi drivers, etc, all derive income during the winter months from participants of game shooting in Wales. Are shooting clients going to commit to booking days shooting, hotel rooms and tables in restaurants, when the licensing system could be altered or removed at the whim of an unsupportive government? From their perspective, booking in other nations of the United Kingdom would obviously represent less of a risk.

It is also arguable that common pheasants are not now 'non-native'. There is evidence that the common pheasant arrived in the UK with the Romans and there are records as far back as 1100. This would make the bird naturalised and not 'non-native' as defined by common convention.

5. 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

We do not feel that the licensing system proposed is needed or would be in any way beneficial to Wales's rural environment. As we have explained in question 4, we feel that it would only decrease the amount of wildlife and conservation work being undertaken. We also feel that it is not proportionate because of the potential social and economic decline and damage that would be done to Welsh rural businesses, not to mention the potential disadvantages to speakers of the Welsh language.

Also, given the statement by the climate minister stating that the Welsh Government does not support shooting as a leisure activity, it is highly likely that the aim of this proposal is to create a licence with the intention of removing it or making it impossible to operate under. It is clearly disproportionate to those rural workers who are reliant on shooting for employment and family homes. To have an openly hostile government to an entire sector, using licensing to further its aims to restrict and limit shooting in Wales, makes it very difficult to believe that it will be proportionate or fair, never mind workable.

In your annex 3, there are some assumptions made which are taken out of the context of the original report. Some of the reports quoted were paid for by the RSPB, which is clearly anti-shooting and the reports are not peer reviewed. There is also speculation about possible impacts which generally isn't clearly identifiable. Based on this flawed evidence we feel that any proposed licensing would not be proportionate.

Referring to the table 1 in Annex 3 some of the concerns raised are not proven or are implausible:

Bats – It is highly unlikely that pheasant release will impact on the insects that bats feed on to any measurable degree.

Doormice – To state that pheasants are known to eat small mammals is anecdotal and not directly quoted in any of the evidence in any of the papers reviewed.

Rodenticide – It is very rarely used at pheasant or partridge feeding sites and all gamekeeper users are required to be trained to high standards to use rodenticide away from buildings.

Hedgehogs – may walk past game feeders but it is highly unlikely that they will feed on the grain put out for gamebirds.

Rodenticide industry surveys (CRRU) show that there are higher levels of engagement in training courses for best practice use of professional grade rodenticides in the gamekeeping sector than the farming sector.

Brown hares - Leverets (young hares) are very vulnerable to fox predation, and game estates that control foxes tend to have more hares than non-game sites. This beneficial mechanism of game management has supporting evidence and it is not explored here.

The evidence base with regards to Avian Influenza in this report has been misinterpreted, is not based on any real facts and includes much over-stating. The transmission of AI from gamebirds to upland species is speculative and there have been no proven cases that this has occurred. The transmission of AI from gamebirds to sea birds is possible, but there is no evidence that this has occurred or will occur.

Resource competition - Mason et al. (2020) which is un-peer reviewed report suggests resource competition with farmland birds but without any evidence; the Game and Wildlife Conservation Trust disputes this as a realistic mechanism for

negative effect of releasing on farmland bird populations. Many game shooting farms have a larger population of farmland birds as a direct result of game management activities than farms that have none at all.

Grey Partridges – Any “over shooting” of grey partridges is highly unlikely. Game managers are experienced and adept at quarry identification; gamekeepers are able to drive red-legged partridges without moving greys in most instances.

Invertebrates – The table in the report suggests that landscape effects are possible but there is no evidence of this and in our opinion this is not plausible. Many shoots report invertebrates and reptiles across the entire landscape.

Lichens and bryophytes – The reference cited Bosanquet 2018 did not follow basic scientific sampling procedure and should be viewed cautiously.

A conclusion is drawn about raptor killing yet the issue is not referred to in the main table and only in passing in the text, so this is not a conclusion. According to statistics from North Wales Police, there has been one instance of raptor persecution in the last three years.

6. 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 be improved.

We do not feel that these proposals should be implemented at all for common pheasant and red-legged partridge. Some of the reviews you have conducted lack rigour and are unproven. We have outlined some of the issues in annex 3 in the previous question. You are proposing to create a licence based on little evidence. Without sound data to back up these experts' opinion, their opinion has the same weight as anybody else's. In our opinion as experts ourselves in this field, the licensing system should not be implemented at all.

In addition, the proposed approach is confusing and does not recognise how red-legged partridge release is managed. For example, the current proposal requires 'dedicated cover crops' when in fact other crops might be utilised.

7. 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?

In any calculation, all of a land holding's woodland would need to be considered and counted. However as we have stated, by introducing a licensing system, there is a real risk that woodlands will deteriorate because of the uncertainty the Welsh Government will create within the rural community which currently cares for these places. Research by the GWCT has shown that woodlands managed for game are in better condition than those that are not.

Even though the Welsh Government has openly said that it does not support game shooting (comments made by Julie James), NRW should support sustainable game shooting including gamebird release, with all of its benefits to individuals, local communities, habitats and wider conservation, including initiatives by the shooting sector to enshrine best practice through other channels and routes, rather than via this proposal.

8. 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

The introduction of a licensing system in Wales for any sized release has the potential to have an adverse impact on the environment, which goes totally against the reasons for introducing it so we don't agree that any such system should be put into place.

In addition to negative environmental impacts, people's well-being, mental health and rural businesses will all suffer, no matter the size of the release. It is arguable that the larger shoots with full-time professional gamekeepers are in the best placed to avoid and mitigate the very low risk of any environmental impacts of gamebird releasing with ongoing conservation work, paid for privately by the shooting community. There is no evidence that by introducing a licensing system in Wales there will be any social, economic or environmental benefit to the wider community. There is, however, a very real risk that it will contribute to landscape, species and rural enterprise decline.

There is an existing legal framework in place to protect sensitive sites, i.e. SSSIs, via the consenting regime and any activity that damages such a site can be stopped by NRW.

If NRW has concerns around its legal obligations in relation to European Protected sites, then NRW should consider and consult on following the same approach for these areas as has happened in England, ie. introduce a light touch interim general licence approach solely in relation to these sites.

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

Yes. This will reduce the number of actual shoots in Wales and the number of days people will be able to shoot. That in turn will reduce the opportunities for Welsh speakers to attend these days in rural areas during winter when they might otherwise not meet people away from their immediate family. Another factor in the impact of the reduction of Welsh being spoken on shoot days is the chance for non-Welsh speakers to be able to hear the language. Tourists travel from all over the world to shoot driven game in Wales, mainly from the United States and European Union. The only reason many of these people travel to Wales is to shoot game; if that is reduced then the chances they have of hearing Welsh spoken in Wales will also diminish dramatically.

10. 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

Encourage more shooting in Wales, not less. This will allow more Welsh to be spoken in rural areas and also have the added impact of allowing more tourists to hear the Welsh language.

11. 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

Yes, by reducing the amount of shooting in Wales there is a genuine possibility that Welsh nationals will have to migrate to England or Scotland to continue in their chosen career meaning Welsh speakers will leave the country.

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

Not answered