

**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 reject this proposal on the following basis:-

a) The proposal misunderstands the status of the two species as natural and long-established denizens of the British countryside.

Categorisation of the species under the above legislation is inaccurate. Pheasant and red-legged partridge have existed in the UK for more than a millennium. The first known evidence of their existence here is Roman; the first breeding birds here are thought to have been introduced around the time of the Norman Conquest. In the wider context, it is important that NRW be consistent about the categorisation of species: others such as the brown hare, *lepus europaeus* – a species that is protected – share this status as a long-established species.

b) The proposal is not backed by data or evidence that there is a problem with game-bird release

The evidence published with the consultation is insufficient to support the proposals. In fact, the document itself doubts that a problem exists. Notably, the document states that the proposals are based on “a crude general picture of the activity across Wales” (our italics).

The ranges in the document’s assumptions are so wide that these do not provide a credible basis for policy decisions (eg: levels of compliance with the mandatory register “likely to be somewhere between 20-73%”. The consultation further admits that no Wales-specific data on adherence to GWCT codes exists, leading to the assumption that compliance “may be low and patchy”). To put forward regulation, when the data is so incomplete, is clearly disproportionate. This is an impossible starting point for credible proposals.

c) The proposals are based on ill-informed prejudiced premises and inaccurate suppositions

The consultation is prejudiced in a mistaken assumption about the nature and vital positive role played by game-management. The many environmental benefits associated with habitat management for game rearing - which are acknowledged in the consultation, clearly counter the assumptions in the proposals. It is not clear that NRW has weighed the likelihood and scale of possible environmental damage against the known environmental benefits – we would expect the latter to far outweigh the former. This is equally true with respect to economic, social and cultural benefit, as this response will explain.

High standards exist within the game management sector meeting high expectations from those who take part, and also incumbent in the training and qualifications achieved by game managers and land managers. The consultation document offers no consideration of the high value of this expertise and how it should be sustained and enhanced in the future.

The introduction to this consultation informs us that the ethics of shooting are not pertinent to this consultation. However, during the consultation period, the Welsh Government Minister for Climate Change made very clear her ideological views in the Senedd. Together with the poor standard of the evidence used, this undermines the credibility and objectivity of this consultation process. It also undermines the trust of respondents that consultation is grounded in science and that their views will be taken into account.

**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**

a) The existing proposals are unlawful

NRW's proposals contravene the European Convention on Human Rights (ECHR) First Protocol, in disproportionately controlling or restricting the freedom to use one's personal property. It is our view that the current proposals are neither proportionate, fair nor balanced.

As an example, given that such a small proportion of some of the most sensitive areas in Wales' European Protected sites, have identified the release of gamebirds as a threat (1.7%), a fairer and more proportionate balance may have been struck by dealing with the areas of potential threat rather than covering the whole country. Given this lack of proportionality in the proposals, and the fact that there is no independent first-tier review process, these proposals fail to strike a fair balance between the public interest and the requirement of the protection of individuals' property right.

Where designated land is defined by proximity to rivers and their tributaries, restriction is likely effectively to ban game rearing in many areas. This is clearly disproportionate.

Further, the licencing proposals violate fair trial guarantees under Article 6 (1) of the ECHR in that a substantive appeals process does not accompany the proposals. This Article sets out that individuals must be provided the facility of a fair and public hearing within a reasonable time, by an independent and impartial tribunal established by law. Under the proposals put forward, the only method of appeal open to an individual would be to apply for a judicial review. The proposals do not provide the safeguards of appeal process to any form of independent tribunal such as the Planning & Environment Decisions Wales (PEDW) before this step. In our view, this would not satisfy the necessary standards, as the independent appellate body should have full jurisdiction on both fact and law.

The shortcoming illustrated above was highlighted by the Law Commission in its consultation to the Wildlife Law project. The resulting report was published in the UK House of Commons in 2015.

In addition, the absence of a substantial review process from the licensing decision means that NRW's current proposals are in breach of the UK's obligations under Article 9 of the Aarhus Convention. The UK ratified the United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, in February 2005, and became parties to it in May 2005. Its language chimes with foundation legislation and political principles in Wales. The Convention links environmental rights and human rights. It acknowledges that we owe an obligation to future generations. It establishes that sustainable development can be achieved only through the involvement of all stakeholders. It links government accountability and environmental protection and finally it focuses on interactions between the public and public authorities in a democratic context. Here, again, the licencing framework under the Wildlife and Countryside Act 1981 – and

therefore NRW's proposals – do not provide for a substantial review process of a licencing determination.

b) The proposal is made without assurances restraining regulatory creep

Any proposals, which create a facility for the Government or its agency to make any activity more difficult or costly through incremental (or more dramatic) requirements – must include safeguards and a process for democratic review and consultation within the sector. The proposals do not include reference to an appeal or redress process.

c) Inadequacy of data makes the licencing approach inefficient and possibly ineffective

NRW's report offers such a wide disparity in the number of shoots existing in Wales - between 171 and 431 – that it is impossible to draw any reliable conclusions and impossible to make precise and measurable proposals.

The absence of data prevents measurement and undermines any sense of proportionality. The proposals are arbitrary; lacking this fundamental basis, they are unmanageable, inefficient, and possibly ineffective. At the same time, NRW must understand the harm that the proposals could do, and the responsibility they have to conservation of nature and landscape in Wales.

d) NRW's capacity to administer and enforce

Members' experience is that existing licence administration processes are slow, inefficient, and costly - and appeal processes are often all of these - and flawed. NRW's proposals include no details about the conditions under which a licence will be granted and how the sector will be consulted with respect to their development. No proposals relate to the important topic of how a licence and accompanying restrictions would be policed, and what resources would be required. Any workable licencing system will need to take into account the constant, rolling programme of action required in managing a shoot.

The remit, structural, and resourcing challenges faced by NRW are well understood. As UK governments look to reinterpret EU law into UK and Welsh law, as NRW looks to manage its role in the context of the water-borne nutrient crisis and the introduction of the Sustainable Farming Scheme, it is difficult to see these proposals bearing high priority for NRW's stretched resources. Again, this would have an impact on both the efficiency and the effectiveness of the proposed regime. Given the lack of conclusive evidence on the presence and scale of a problem, the resource costs are not justified.

e) The Welsh Government's and NRW's environmental principles may not be well served by the licencing approach.

The licence approach introduces high degrees of uncertainty for land managers sufficient to suppress investment in cover for game birds (trees & habitat) and reduce tree planting – a mainstay of Welsh Government policy. Welsh Government policy regarding agriculture promotes tree planting and woodland management to tackle climate change, habitat creation for bio conservation and predator control. The Government and NRW governs the countryside with the consent and cooperation of the rural community. It is vital that this relationship is sustained.

Game release pens and other facilities/equipment all have a long lifespan in this business. They are also very expensive to replace or upgrade to new standards. Licence conditions, which will require investment, will certainly render some shoots unviable and the possibility that such conditions will be imposed is a major disincentive to apply.

Gamekeepers, shoot managers and their teams are a multi-functional resource, playing a vital role on the ground in managing landscape, environment, natural conservation and meeting NRW's goals. The 2014 Value of Shooting survey indicates that these provide the equivalent of 490 jobs managing the £7.4 million on environmental management associated with 380,000 hectares of land in Wales. NRW must consider the potential impact of losing this resource in the context of the Welsh Government's net-zero commitments, focus on biodiversity and the Sustainable Farming Scheme "10 per cent" tree-planting requirement. Associated with this, a fundamental requirement of successful tree growing (a key part of current Welsh Government policy managed by NRW) is the control of grey squirrels and deer. Gamekeepers play a vital role in undertaking this activity. In their absence, it seems likely that there will be a negative impact on growing trees successfully in order that they will reduce carbon and ultimately produce a useful timber source.

f) The economic and social impacts of the proposal have not been accurately assessed

The proposals have not passed a fair and similar standard in impact assessment that would be expected for Welsh Government / NRW proposals. It is clear that NRW is aware of this. NRW's own report Patterns of Gamebird Release, Management and Shooting in Wales refers to strong "socioeconomic consequences" of what is "a long standing and widespread activity."

Impacts on the Welsh rural economy and jobs

Nature of economic contribution

1. As an income-generator, game rearing is undertaken as a logical agricultural diversification where land resources benefit from it. This can provide an important income-stream in the winter season when revenue from farm production can be low. While agriculture is a marginal commercial activity for so many Welsh farms, every possible source of income is vital to the business bottom-line. We know from evidence provided by █████ members that profit margins are modest for the vast majority of shoots in Wales. Despite this, the contribution to local economic revenue is highly significant. There is little room to cover the cost of a licence and accompanying compliance costs, and such costs would be nugatory where there is no evidence that a problem exists.

Impact on the Welsh / Regional / Local economy

2. The contribution of game management to the rural economy is significant, though often hidden owing to its integration with other sectors (agriculture and tourism, for example). BASC informs us that the shooting industry contributes up to £75m per annum to the Welsh economy – some expert sources believe this is understated. This is managed in some 2,900 businesses, directly employing 2,400 full time employees.

3. Any impact assessment must take into account the effect of the proposals on regions (counties) or localities. Stats Wales GVA figures by region (2021) reveal at £3,663m for Mid Wales compared with £35,303m for South East Wales (Wales total £69,500m) warn us how fragile some regions' economies really are. Despite the lower population in Mid Wales, the GVA per head is still significantly lower, (same source).

Economic profile of game-rearing businesses in Wales

4. Our research has informed us that on the ground, a typical mid-Wales shoot, which manages 5,000 pheasants on 1,500 acres, may manage an annual turnover of around £70,000. Shoots that rent rough land, often from several farms, provide a valuable income to those farm businesses. The

manager of one important Montgomeryshire hotel believes that the majority of their winter overnight bookings can be put down to visiting shooting groups.

5. A typical shoot may consist about 12 shooting days, each for 8 paying guns. To service this the shoot requires beaters and pickers, a caterer (possibly with an assistant), and the required food and drink. Fundamental cost of birds, feed, fuel etc, must be added. This event requires a budget of about £2,000 for the day – this is largely invested in local people.

6. Poultry-rearing businesses are an example of farm-diversification, which has been systematically encouraged by the Welsh Government. In Wales there is at least one business, which has made major investment in plant and equipment, is an important employer of highly skilled people and which sub-contracts to some 50 farms in the area for rearing. This activity subsidises subsidiary businesses in the area, it (and many other businesses provide highly skilled jobs supported by a formal training process). It is important that the devastating impact of these proposals on this business community be properly assessed and mitigated.

#### Member case study 1

A medium-sized shoot in mid-Wales provides the following data. All of the investment here is spent in the local community. The shoot provides approximately 800 activity days for the guns, beaters, picker ups, cooks and cleaners who participate in this sporting activity. :-

Wages	£20,000
Poults	£19,140
Feed	£13,800
ATV	£11,000
Rearing Sundries	£2,500
Vet and medical supplies	£1,500
Contracting	£1,000
Gas	£5,100
Heating Oil	£1,500
Repairs	£3,500
Vehicle maintenance and fuel	£6,500
Machinery and equipment	£2,500
Beaters and Pickers	£9,800
Local caterer	£8,000
Casual labour	£1,100
End of the season social event	£1,200
Total	£108,140

#### Member case-study 2

An operation well over a century old, this is a non-profit making business, but its annual turnover is around £80,000, supporting the vital point that shooting makes a significant contribution to local economic churn. The shoot provides approximately 800 activity days for those involved in its successful delivery. This work also plays a key part in land management strategy: it has supported the decision to farm the land organically and conservation management of around 400 acres of woodland for all wildlife has been dictated by this operation. Linked with the Welsh Government's drive to increase forestry and woodland within the Sustainable Farming Scheme, this operation ensures that this is sustainable and well managed.

The shoot manager reports: "The biggest expenses are poults and feed, but beaters' wages, catering, butchers and cleaners all make up significant portions of the cost. We buy and maintain machinery, carry out fencing operations and other tasks solely for gamebird management. We employ a full-time gamekeeper and house him and his family. We do this because we are passionate about the countryside, the skill of game management, and our inherited and acquired knowledge of our land and the habitat we create."

This shoot plays a key part in sustaining a Grade 2\* listed property which is sustained by private means.

He adds, "Anything that increases costs in the sector will make the business less viable. Shooting is a seasonal activity that requires preparation and commitment in planning, financial and employment terms well in advance. Any uncertainty over a grant of a licence will render the business non-viable and therefore even a well-designed and administered system will have a negative impact on the viability of shooting."

### Member case study 3

Representing a small shoot in North Wales, this member reports that the cost of managing this activity is integrated with wider land management responsibilities. Consequentially, the impact on below-the-line business finances would be modest. However, he states, "the real loser from these proposals will be the Welsh countryside.... We work with NRW... to manage wild species like corvids, which prey on protected species such as curlew. The poult feed is also a welcome supplement for songbirds at times when their natural food is in short supply. Our woodlands would not be managed in the absence of poult-rearing."

### Negative multiplier effects of reduction in game rearing

Members have commented that anything that increases costs in this sector will make businesses less viable. Shooting is a seasonal activity that requires preparation and commitment in planning, financial and employment terms well in advance. Any uncertainty over the grant of a licence increases financial risk; therefore, even a well- designed and administered system will have a negative impact on the viability of shooting.

The proposals will bring about a reduction in shoot business' output. BASC estimates that if NRW proceeds with its proposals, it could remove the positive conservation spend completely which would equate to around 10% negative impact to the sector. There will be a further negative impact with the loss of generated income as game shoot businesses begin to reduce output. This is assumed to be a direct loss of 10%. The resulting total assumed loss will be £7.5m + £7.4m = £14.9m. Added to this, given the accepted multiplier at 1.5, total loss (direct and indirect) will be £22.35m.

The £7.4m conservation loss is added to an assumed economic loss (as a result of a reduction in business activity) of 10% of the total sector value of £75m equalling £7.5m. This brings a total negative impact to the game business of £14.9m.

When we take into account a multiplier rate of 1.5 (which is the direct and indirect impact on those other businesses in the supply chain) the total loss is £22.35m. The multiplier rate is that used in the PACEC value of shooting report. Please note there are three negative impacts: the conservation loss, the direct business loss and the supply chain loss calculated through the multiplier.

Restricting shooting in Wales will drive much of the activity – along with its economic, social and other benefits – to other areas. We have already seen evidence that professional gamekeepers fear for their jobs and are looking for opportunities to continue their work elsewhere. Previously mentioned: according to BASC, some 490 FTEs managing conservation projects would be lost. These would need to be replaced for these projects to continue.

Need to preserve highly skilled, secure and long-term jobs in rural Wales

Game keeping is a specialised and highly skilled role requiring high levels of versatility. The National Gamekeepers Association (NGA) tells us the activity supports 2,500 jobs in Wales. These skills may be transferrable, however the high level of vocation to the role will lead to a drain in skills, which will be challenging to replace. We have not seen a formal assessment of impact on jobs and knowledge base.

Uncertainty about granting of an NRW licence might drive some employers to the last resort of redundancies for gamekeepers. This raises questions about compensation and redundancy payments in the event of a licence being withheld unreasonably (the issue of absence of an appeals process has been raised) – or if a licence is not granted within a reasonable timescale. As an administering body, NRW will be likely to manage a high volume of licence applications at certain times of the year.

Impact on the development of a sustainable food source

Game meat is becoming better understood for its high quality, contribution to good health and low-cost, which has made it appealing for public procurement – notably for the NHS. By its nature, it is virtually organic having roamed freely and chosen its diet for much of its life – consequently it is rightly highly prized. Businesses such as Willo Game are producing high quality, high-value goods in increasing demand both in the UK and export markets. This business reports a 20% year-on-year increase in demand for “feathered game meat (FGM).” In 2022, Willo Game prepared over 1,000 tonnes of high quality FGM – for butchers and the catering sector. This equates to around 1.3 million game birds. The business employs 14 full time members of staff and 26 seasonal. Note: Willo Game was established by members of the shooting fraternity to ensure that a professional and sustainable local outlet for game meat exists. The business was subsequently rescued by further re-investment and has since grown. Our understanding is that this business had around 100 game-rearing community shareholders. Their individual investments were £3,000 per investor.

These products are natural, high in protein, low fat, and have not been exposed to chemicals and additives and to use an increasingly highly valued phrase in the animal welfare lobbying community: have been reared sustainably, having led freely roaming lives, choosing where they roost and what they eat, etc... A reduction in availability of FGM would clearly jeopardise the above positive business, while the establishment of a game meat processing facility in Wales could be a major

positive step towards further developing our sustainable game industry. It would be a missed opportunity to allow this opportunity to be picked-up elsewhere.

The Welsh Government itself has sponsored Hel Cig Cymru (Welsh Game Meat) as a supply chain development project. The project concludes that: "...there are excellent opportunities to develop a better future for game meat and the potential to add value and possibly create new businesses and jobs in rural Wales, in particular given some of the excellent advisory and financial support schemes offered by Welsh Government. To develop a profitable market for Welsh game meat, above all the future of primary processing in Wales needs to be addressed." It is important that NRW's proposals do not transgress this very work carried out by the Welsh government.

The Country Food Trust has an important role to play. Funded 100% by the shooting fraternity, over 5 years it has provided free food in the form of game to circa 2.5 million homeless people in the UK.

#### Impact on environmental benefits

Farmers and landowners invest in, maintain and manage large areas of woodland and brush-cover for game, which are integrated into the wild food chain as floral distributors and both prey for – and of – fauna. In addition, shooting often necessitates the planting of cover crops and feeding corridors. This has a benefit to wildlife in that it provides cover and shelter. Because gamebirds are fed over the winter months, when there is far less natural food available, this in turn provides food for other wildlife. It is not an uncommon sight when the beaters go into a cover crop to see an explosion of songbirds. A conclusion from this exercise must be that research must be conducted to fully understand the positive part game management plays in supporting conservation of many species under threat such as curlew, lapwing and several species of owl.

Linked with above, competent game management requires the active management of vermin – rats, mice and in addition, some invertebrate pests. Pheasants themselves will prey on some vermin species and the management of game necessitates control of rats. Our research tells us that game managers closely monitor and control vermin levels. Important related work of legal wild predation control of livestock (including sheep and poultry), is expertly and responsibly carried out by gamekeepers who are well informed of the relevant legislation.

#### Impacts on social and health benefits

The Welsh Government assigns high levels of priority to physical and mental health. In Wales and England over 500,000 people take part in game management and shooting activity. Our discussion with members suggest that those involved in supporting shooting (beaters and pickers) participate not only to supplement their income, but for members of isolated rural communities during the winter months when mood is lowered by darkness, dampness and low temperatures, this activity is highly therapeutic. Many shoots are Welsh speaking and this contributes to sustaining the Welsh language in areas where typical Welsh-language resources may not exist.

#### Member case study 4

One manager of a shoot details that each shooting event involves about 40 people, supporting and including up to 10 guns. He calculates that a season provides 800 days of highly therapeutic recreation, which has physical and mental health importance. Few other facilities exist to bring members of isolated rural communities together in a healthy environment. If fewer shoots decide to operate as a result of the licensing regime, some of these benefits will be lost. This impact has not been assessed. Given the poor data and therefore uncertain outcomes that the proposals would achieve, this risk is unnecessary.



Contrary to popular perception, involvement in shooting is socially inclusive, it is not ageist or gender discriminatory. Like angling, it is a key component of Welsh rural culture. The government is sensitive to protect diverse cultural mores in our society. NRW and the Welsh Government must not fail to recognise that rural culture is deeply embedded in large areas of Wales. It is notable how this is celebrated in the media and in an event of national significance such as the Royal Welsh Agricultural Show. It is entirely appropriate that society respects the rural way-of-life and seeks to sustain it.

**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**

Red-legged partridge are managed under different conditions and a different regime than pheasants. The proposals demonstrate a fundamental lack of understanding of these systems, the nature of cover crops and the role of existing rather than designated cover crops, such as beet and retained stubble.

The question posed points to the need for more appropriate research data and factual backing before any licensing regime can be designed. This should be carried out taking advantage of the latent expertise, resources and consent of the shooting community, working in partnership with the collaborative organisation Aim to Sustain in Wales.

We would endorse GWCT's point that red-legged partridges tend to be released on managed cover crops rather than in woodland (for pheasants). The presence of cover crops supports the bio conservation, which is valued by NRW and the government. These proposals are likely to lead to cover crop planting being severely reduced and replaced by productive cash crops. This will represent a major step backwards for Welsh Government policy.

**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**

We do not believe the one-third maximum proposal is helpful owing to the disparity of types of woodland – driven by many factors including:- altitude and geology, woodland type, presence of water and nature and activity in neighbouring land. For example, a conifer woodland of 2 acres planted for a pen should be treated differently to a 100-acre block of semi-ancient natural hardwoods. Land and game managers make careful decisions about stocking strategy according to the conditions they face. They are best placed to continue making these decisions for the benefit of

bio-conservation, habitat management and the management of their business. “Market forces” can be relied on to eliminate unhealthy, irresponsible and unsustainable operations.

GWCT’s research, and evidence gleaned from our members - both demonstrate that managed woodland is beneficial for bio-conservation in that species can be monitored and compared over time. Today some species increasingly rely on sustainably managed woodland. Equally, GWCT’s work has demonstrated that woodland managed for game provides better resource for bio-conservation than woodland for timber production or managed forest – notably re flora, which benefit from seed-spread and organic fertiliser.

Should NRW’s proposals be undertaken to the letter, only a highly detailed research mapping exercise will be able to determine the best solution. If the Welsh Government want to pursue this route, the proposal should be delayed until a project of sufficient scope and depth – in partnership with the sector – has been delivered and peer-reviewed. A suitable structure needs to be put in place to deliver this.

**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**

The proposals offer no evidence that links size of shoots and quality or level of responsibility. The proposal suggests that the authors of the proposals are not familiar with the structure of parts of the industry where larger shoots contract out to a range of smaller operations. This proposal is an unhelpful distraction from the main thrust of the consultation.

Large commercial operations invest more in habitat management. In addition it is true to say that some “small” businesses which release game birds are supplying larger operations and are doing so in order to comply with (or exceed) relevant standards.

In this proposal, it is entirely unclear what “small” means – or “less-sensitive.” We believe the majority of shoots are sized at 12 days per year. At this level (and below) they are probably not commanding a high profit margin.

Since most shoots in Wales are “small”; this might exempt all but a small number of large operations – all of which are commercial shoots which are open to inspection if necessary and are geared towards clients who understand quality and good practice.

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

**- Welsh language considerations**

Rural Wales: the agriculture and game management community - is the heartland of first-language Welsh culture - many people here communicate in the Welsh language all - or most - of the time. They represent the historical depth of the Welsh culture, and are less partial to influence from other languages. Our game management members advise us that many of their shoot community communicate in Welsh and are irreplaceable - while Welsh speaking gamekeepers are likely to leave

Wales and their language capacity will be lost. Anything which reduces this will create a tragic setback for the Welsh language where the community uses it most.

**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**

NRW - or the Welsh Government - should nurture the Welsh language by creating opportunities to train and work in Welsh in the game management sector and also the game meat food chain.

**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**

As explained above, any proposals which restrict activities undertaken by Welsh speaking people will reduce active Welsh speaking. We can see no means of mitigating this erosion apart from replacing game management with another similar business, social, conservation and environmental activity. This would take a long time to become established - so long, in fact, that the use of the language will have been permanently lost.

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

Any proposals which threaten activities undertaken by Welsh speaking people and which cannot be replaced by Welsh-speaking activities - discriminate against the sustainability and depth of the Welsh language.