

# **NRW's proposed approach to regulating the release of gamebirds (common pheasant and red-legged partridge) in Wales**

## **Report on the number and types of consultation responses received**

**July 2023**

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## Purpose of this report

This report provides an initial summary for Welsh Government of the numbers and types of responses we received to the public consultation on our proposed approach to regulating the release of gamebirds in Wales and how they will be evaluated. Evaluation is ongoing and further reports will be provided in due course.

In addition to this summary, we have provided Welsh Government with copies of all responses submitted to the consultation.

## Background to the consultation

In 2020, the then Minister for Environment, Energy and Rural Affairs announced the intention to add common pheasant and red-legged partridge to Schedule 9 of the Wildlife and Countryside Act 1981 in Wales and to introduce an appropriate licensing regime. This intention has subsequently been reiterated by the Minister for Climate Change under whose portfolio the work now falls. Welsh Government officials and NRW have been asked to consider the available evidence and develop any necessary licensing approach to be implemented in 2023 with a view to coming into force in 2024. NRW have undertaken a review of the evidence relating to the environmental and socio-economic effects and the scale and location of gamebird releases in Wales. In 2022 we invited stakeholders and the public to submit evidence, to which we received responses from a range of organisations and individuals. We also commissioned two evidence reports to

further inform our work. We used this evidence to develop a proposed approach, and a proposal to advise the Minister for Climate Change to take the necessary steps to add common pheasant and red-legged partridge to Schedule 9 of the Wildlife and Countryside Act 1981 in order to bring their release, in Wales, into a regulatory framework.

We ran a 12-week public consultation from the 27th of March until the 20th of June 2023 on these proposals. The consultation served as a statutory opportunity for anyone affected by the proposal to provide representations as required by section 26(4) of the Wildlife and Countryside Act 1981 and NRW committed to provide the responses to this part of the consultation, and a summary of them, to the Welsh Government at the close of the consultation.

The consultation also sought views on proposals for NRW's approach to licensing releases if the Minister was minded to make the order to add those species to Schedule 9. The proposals and the rationale behind them, were set out in a detailed consultation paper which included background information and links to other relevant documents. We also published three annexes setting out our rationale in relation to specific elements of the proposal as well as the two evidence reports commissioned as part of the review.

Respondents were asked to submit their responses using the NRW Consultation Hub, which uses the 'Citizen Space' online consultation platform. From the [consultation landing page](#) respondents could read a summary of the proposals, download a detailed consultation document, its annexes and evidence reports, as well as access the consultation questions.

Once a response had been submitted respondents received a unique response number and were able to request a PDF copy of their response. Whilst there was no function to allow respondents to change or withdraw a response via the hub, it was possible for them to contact the project team and ask for their responses to be manually withdrawn. Respondents were able to submit more than one response.

Our online consultation provided free text boxes for users to submit their responses. Although some questions asked respondents whether or not they broadly agreed with elements of the proposal, those questions also asked for the reasons why the respondent had expressed that view.

Respondents who were unable or unwilling to respond using the online hub were able to submit responses by email or by post.

## How the consultation responses are being considered

We are using a qualitative methodology known as thematic framework analysis to evaluate the responses. Thematic analysis is a widely recognised approach to qualitative data analysis that enables researchers to generate insights and concepts derived from data. Thematic analysis involves reading through a data set (often applied to personal testimonials, written responses to consultations, transcripts from interviews focus groups etc.) and identifying themes, views or opinions that are repeated across the dataset.

This approach is particularly useful where multiple researchers are working on the same dataset and provides a methodology that can be followed by those who are not specialists in qualitative research.

Because of the very large number of responses, we are using a random sample approach. At least two members of NRW staff will review a sample of 1000 randomly selected responses for each question or set of questions. We tested various sample sizes and found that after analysing 1000 responses a saturation point was reached where no further themes were forthcoming. We broadly assumed that a theme identified in the sample was likely to be repeated elsewhere in the population. In order to maximise the number of responses considered, each reviewer will use a different randomly selected sample for each question or set of questions<sup>1</sup>. Once a sample is selected, in order to make it easier to identify unique themes, reviewers will filter them to remove blank or identical “cut and paste” responses. This will generally involve a combination of applying excel functions and manual filtering.

This analysis aims to identify emerging themes, and we do not intend to attach particular significance to the number of respondents highlighting a particular theme. Therefore, given we are using a sampling approach, all themes which emerge in each sample will be included in the analysis, as we assume that a theme identified in the sample is likely to be repeated elsewhere in the population.

We are taking an inductive approach, progressively building up the themes from the responses. We define the emerging themes as each response is read in turn, adding further themes when new issues are identified, or adding to, rephrasing, or dividing themes already identified. The aim is to create a comprehensive summary of the key themes emerging from the responses received, rather than to present in detail every point made in every response.

In order to safeguard against potential unconscious bias, we have also asked an independent consultant (specialising in qualitative analysis with no prior involvement in this project) to carry out confirmation/disconfirmation analysis using the same methodology for some of the questions. We will compare the themes identified by each reviewer.

Although we are reviewing responses from key stakeholder organisations separately, this is primarily for practical reasons due to the length and more technical nature of these responses. We do not intend to draw a fundamental distinction between themes or issues identified by organisations and those identified by individuals, and we will not make any presumption that the former should carry more weight. However, in some cases it may be useful to identify where some themes are raised by particular stakeholder, or groups of stakeholders, such as where an issue relating to practicality of a particular element of the proposed approach is raised consistently by organisations who will be directly affected by that aspect of the proposal.

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<sup>1</sup> Due to an administrative oversight the Welsh Language Questions were only added on day 4 of the consultation. Responses submitted before this point were omitted before the sample was taken for the analysis of those questions but were included for other questions.

In addition to identifying key themes using this approach, we will also identify any specific technical or legal issues raised and will record those separately for consideration by relevant specialists or lawyers.

## Overall summary of consultation responses

### Total number of consultation responses received

We received a **total of 42,597** responses to the consultation.

The total number of responses included all those that were not withdrawn, including those that were effectively blank. We estimate that around 3% of responses submitted via the online consultation were effectively blank in that they provided a name and/or email address but contained no substantive responses to any question, nor sufficient information to reasonably determine whether the respondent was broadly in favour of the proposals or not. We received only one request to withdraw a response and that response was removed.

### How responses were submitted

**27,840** responses (65.36%) were submitted online using the NRW Consultation Hub, **14,754** responses (34.64%) were submitted by email and **three** (0.01%) were submitted by post.

### Language of responses

The majority of responses were in submitted in English. Two responses were submitted to the Welsh language online consultation, but some of those submitted to the English consultation were partially or wholly submitted in Welsh. We also received email responses wholly or partially In Welsh.

### Geographic location of respondents

Although the online consultation did not ask where respondents were based, it was clear from reading the responses, and from the samples that we analysed using google analytics, that responses were received from across Wales, the UK, Europe and beyond. This was also the case for those email responses that included information about the location of the respondent. Two of the responses received by post were from addresses in Wales and one from England.

### Responses from organisations

Question 3 of the online consultation asked respondents if they were representing an organisation. This question was intended to identify formal responses from stakeholder

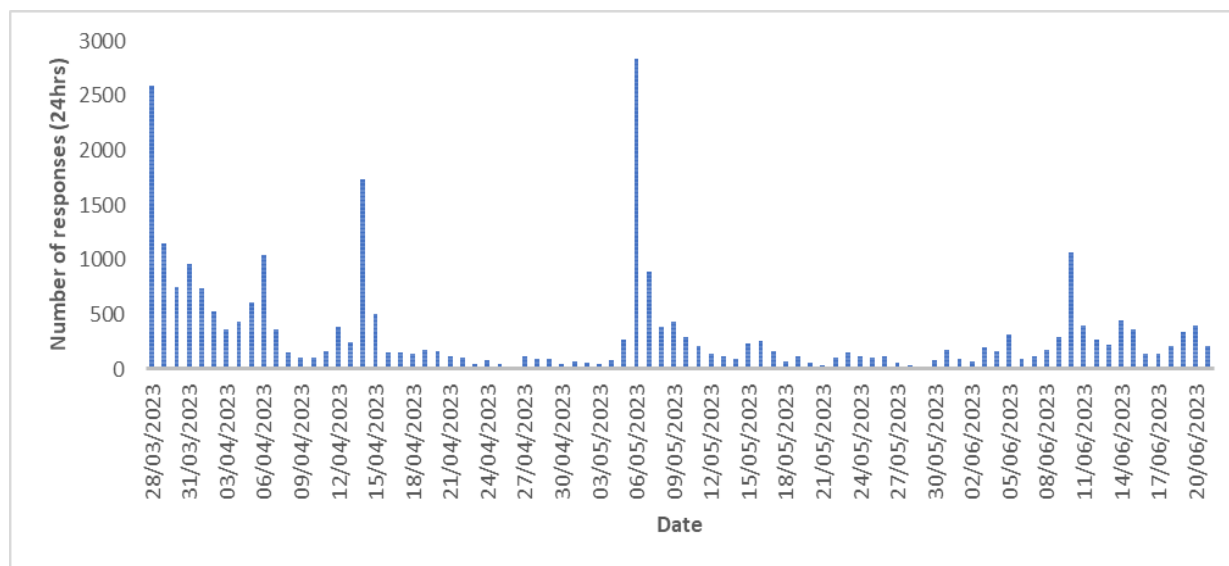
bodies. However, many respondents appeared to use this question to identify one or more organisations whose views they supported or of which they were members (such as BASC or Wild Justice). Others appeared to indicate their employer. Many responses identified particular shoots or small businesses in response to this question. We have not treated these responses differently in our analysis and we do not intend to list organisations identified in this way unless we can be confident that the response is an official organisational response.

We received official responses from key national or local stakeholder organisations through the hub and by email. These tended to be substantial and those submitted to the hub were therefore extracted into separate documents to make reviewing them easier. A non-exhaustive list of stakeholder organisations who responded to the consultation is included at Annex 1.

## Responses submitted to the online consultation

In total, we received **27,840** responses through the Consultation Hub.

We received around 2,500 responses to the hub in the first 24 hours and continued to receive responses on every day of the consultation period. There was a pattern of significant spikes, appearing to coincide with stakeholder social media campaigns at various points. We were not able to confidently identify the stimulus for every spike.



*Fig. Numbers of responses received to the consultation hub every 24 hours*

We received a lot of useful feedback to the consultation; both in terms of general views on the effectiveness and proportionality of additional regulation but also feedback on specific elements of what was proposed. A lot of respondents referred to their own personal experience in drafting their responses and offered suggestions of ways they felt the proposed approach could be improved.

However, only a minority of responses received were substantive individual responses. Many used standard campaign text provided by a number of stakeholders and others provided very limited responses, often just answering “yes” or “no” to each question. Many respondents only answered some questions and left others blank. Around 3-4% of submitted responses were either entirely blank (with only a name and/or email address provided) or completed in such a way that was not possible to reasonably determine whether the respondent was broadly in favour or opposed to additional regulation in principle.

## **Quality of responses submitted through the hub: limiting factors**

We became aware early in the consultation that some stakeholder organisations were providing pages or posts with a particular interpretation of what was proposed. These interpretations were often inaccurate, often referring to a “ban” or suggesting that Wales would be the first country in the UK to licence gamebird releases. These pages often then linked directly to the consultation questions, bypassing the landing page where the details of the proposed approach and supporting documents were made available. We saw a number of responses that suggested that we had not provided any details of the proposed approach or evidence to support it. This led to concern that some respondents were unaware that this information had been made available and were therefore unaware of what was being proposed.

For confirmation, we used *google analytics* to monitor how users were engaging with the consultation and this indicated that, during the period monitored, only around 10% of users had visited the consultation landing page, and that of those that did, the average stay was only around 20 seconds.

The Citizen Space platform did not allow us to prevent the survey being accessed without visiting the landing page first. However, once we became aware of the issue, we added a line to each page of the survey, explaining that details and supporting evidence were available on the summary page, and we added a link to that page. Unfortunately, subsequent analysis suggested that this did not have a significant effect in encouraging respondents to access and review the consultation documents prior to responding to the consultation questions.

The evaluation of responses must acknowledge that not all respondents were fully aware of what the proposals were, before responding to the questions. In many cases, we can only be confident that responses reflected a respondent’s attitude to the general principle of additional regulation (and often their attitude to a perceived ban) rather than the specific approach being consulted on.

## **Multiple responses from individuals**

We found widespread evidence of individuals submitting multiple responses. Because our focus was not on the numbers and this was not a “vote” and because we did not wish to prevent individuals who had submitted genuine substantive comments from adding further substantive comments at a later date, we did not put in place mechanisms to prevent this.

However, there was an expectation from some that the consultation would be treated like a vote. We were made aware, via social media posts, that some people were being encouraged to use variations of their names and submit multiple responses.

Multiple responses from an individual that contain substantive content will be considered and evaluated on their merits, in the same way as any other response. Multiple responses from individuals that do not contain substantive content will have little or no impact on the overall evaluation.

Towards the end of the consultation period, we saw evidence indicating that a very large number of responses (>1000) were entered onto the consultation by a single individual (or a group of individuals at a single location) but using different names and email addresses<sup>2</sup>. We think these may have been associated with petitions which may have been collected centrally and used to populate the online consultation. These were typically not substantive responses and a significant proportion simply responded to every question with a single letter and were therefore effectively blank.

## Responses submitted by email

We received **14,754** responses by email. Although most of these (**14,720**) were campaign emails submitted using one of a number of online lobby platforms. We received a small number of substantive personal responses from individuals by email and some stakeholder organisations submitted their responses as documents attached to emails rather than using the online consultation form.

Towards the end of the consultation, we received a number of emails relating specifically to concerns about the impact on the Welsh Language.

## Campaign emails

We received mass emails from three campaigns. These emails were typically generated through third-party lobby platforms and used standard text. As they do not contain individual substantive views they are of limited value, however the full text and details of each is given below.

### Campaign emails from the Countryside Alliance

We began receiving these emails on the 29<sup>th</sup> of March and continued to receive them for the duration of the consultation; a period of nearly 12 weeks. A total of **12,935** were received.

These emails were sent to the [gamebirds@cyfoethnaturiolcymru.gov.uk](mailto:gamebirds@cyfoethnaturiolcymru.gov.uk) address. Those from respondents who entered a Welsh postcode were also sent to the inbox of the relevant Assembly Member.

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<sup>2</sup> These were large blocks of very similar and unusual looking responses. Typical blocks of responses from individuals that use similar cut and paste text provided by stakeholders show a normal distribution of operating systems (this information is collected and reported by citizen space) however in these cases the operating systems were identical.



These emails used standard text, which did not appear to be editable. The standard text can be seen in Annex 2.

## Campaign emails from RSPB Cymru

We began receiving these emails on the 9<sup>th</sup> of May and continued to receive them for the remainder of the Consultation; a period of around 6 weeks. A total of **1,478** were received.

These emails were sent to the [gamebirds@cyfoethnaturiolcymru.gov.uk](mailto:gamebirds@cyfoethnaturiolcymru.gov.uk) address and copied to the inbox of the Minister for Climate Change.

In addition, between the 13<sup>th</sup> June and the close of the consultation, one week later, we received a further **five** Welsh Language versions of the same email.

These emails used standard text. Whilst it appeared to be possible to edit the text most were submitted unamended. The standard text can be seen in Annex 3 and Annex 4.

## Campaign emails from the League Against Cruel Sports

We began receiving these emails on the 14<sup>th</sup> of June and continued to receive them for the remainder of the Consultation; a period of one week. A total of **302** were received.

These emails were sent to the [gamebirds@cyfoethnaturiolcymru.gov.uk](mailto:gamebirds@cyfoethnaturiolcymru.gov.uk) address.

These emails used standard text. Whilst it appeared to be possible to edit the text most were submitted unamended. The standard text can be seen in Annex 5.

## Responses received by post

We provided a postal address for those who did not wish to respond electronically. We received two responses to this address, one of which included attachments. The other letter received was abusive in nature. An additional letter was sent to the Chief Executive of NRW in response to consultation and was subsequently included as a consultation response.

## **Annex 1: Stakeholder organisations that responded to the consultation**

Formal responses were received from the following stakeholder organisations; however, this is not an exhaustive list.

Amphibian and Reptile Conservation (ARC) Trust  
Animal Aid  
Born Free Foundation  
British Association for Shooting and Conservation (BASC)  
Cambrian Mountains Society  
Campaign for National Parks  
Ceiriog Uchaf Community Council  
Coed Cadw/Woodland Trust  
Coetir Anian - Cambrian Wildwood CIO  
Countryside Alliance  
Countryside Landowners Association (CLA) Cymru  
Farmers' Union Wales (FUW)  
Game and Wildlife Conservation Trust (GWCT) Cymru  
Gwent Ornithological Society  
Gwent Wildlife Trust  
League Against Cruel Sports (LACS)  
National Anti-Snaring Campaign  
National Farmers Union (NFU) Cymru  
National Gamekeepers' Organisation (NGO)  
Oxygen Conservation  
People's Trust for Endangered Species  
Rewilding Britain  
Royal Society for the Prevention of Cruelty to Animals (RSPCA)  
Royal Society for the Protection of Birds (RSPB) Cymru  
Shropshire Ornithological Society  
Sparsholt College Game and Wildlife  
Tir Natur  
Wales Environment Link (WEL)  
Welsh Ornithological Society  
Wild Justice  
Wildlife Guardian  
Wildlife Trusts Wales

## Annex 2 Standard text of the Countryside Alliance campaign email

*“Dear Natural Resources Wales*

*I am contacting you in relation to NRW’s proposed approach to the regulation of the release of gamebirds set out in the consultation launched on 27 March. As someone who has an interest in shooting in Wales please consider this email as a response to the consultation.*

*I believe that if the proposals outlined in the consultation are implemented, it could have a devastating negative impact on biodiversity and the livelihoods of those living in the Welsh countryside.*

*I am concerned the Welsh Government could push forward with regulation irrespective of the evidence produced by rural groups as part of the consultation process. The current proposals are not supported by the available evidence, and are wholly disproportionate.*

*The starting point is a total ban on the releasing of all gamebirds, effectively banning game shooting in Wales except where a licence has been granted. There is no certainty that the necessary licenses will be granted, for how long they will be granted and what the conditions of the licensing will be. The future of game shooting in Wales will have no certain future.*

*Over a million people are involved in shooting in Wales and across the UK; many more enjoy the end product as consumers of pheasant, partridge and other game. Moreover, shooting makes a substantial contribution to the rural economy – often at times and in places where other income is scarce. Shooting as an activity is well recognised as having a positive impact on participants’ health and well-being too.*

*Rwy’n cysylltu â chi yn gysylltiedig â dull arfaethedig Cyfoeth Naturiol Cymru ar gyfer rheoleiddio rhyddhau adar hela, a amlinellir yn yr ymgynghoriad a lanswyd ar 27 Mawrth. Byddwchystal ag ystyried yr e-bost hwn yn ymateb i’r ymgynghoriad hefyd.*

*Os bydd y cynigion yn yr ymgynghoriad yn cael eu gweithredu, credaf y gallant gael effaith negyddol ddinistriol ar fioamrywiaeth a bywoliaeth y bobl sy’n byw yng nghefn gwlad Cymru. Rwy’n pryderu y gallai Llywodraeth Cymru fwrw ymlaen â’r rheoliadau er gwaethaf y dystiolaeth sy’n cael ei chynhyrchu gan grwpiau gwledig fel rhan o’r broses ymgynghori. Nid yw’r dystiolaeth sydd ar gael yn cefnogi’r cynigion presennol, sy’n hollol anghymesur.*

*Y man cychwyn yw gwahardd rhyddhau pob aderyn hela yn llwyr, sydd i bob diben yn gwahardd saethu adar hela yng Nghymru heblaw lle rhoddwyd trwydded. Nid oes sicrwydd y bydd y trwyddedau angenrheidiol yn cael eu rhoi, am ba hyd y cânt eu rhoi a beth fydd amodau’r drwydded. Ni fydd dyfodol sicr i saethu adar hela yng Nghymru.*

*Mae dros filiwn o bobl yn ymwneud â saethu yng Nghymru ac ar draws y Deyrnas Unedig; mae llawer mwy yn mwynhau’r cynnyrch terfynol trwy fwyta ffesantod, petris ac adar hela eraill. At hynny, mae saethu’n cyfrannu’n sylweddol at yr economi wledig – yn aml ar adegau ac mewn mannau lle y mae incwm arall yn brin. Cydnabyddir bod saethu fel gweithgaredd yn cael effaith gadarnhaol ar iechyd a lles y rhai sy’n cymryd rhan hefyd.*

*Please see my response to the consultation below - numbers refer to the relevant questions in the consultation:*

*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.*

*No – The Welsh Government has made it clear on several occasions, most recently in a letter dated 2nd November 2021 from Julie James AS/MS, Minister for Climate Change, to Aim to Sustain stating that ‘the Welsh Government do not support the shooting of live quarry as a leisure activity’. The current proposals would enable the Welsh Government to ban game shooting by preventing or severely restricting gamebird releasing in the future. The timing of this consultation, before all the evidence is available, clearly shows that this is being politically driven and is not evidence based.*

*The proposals are neither proportionate nor reasonable given the available evidence. We are currently in the first year of a three-year research project being undertaken by Defra, Natural England, and the Animal and Plant health Agency. The project was commissioned following gaps identified in the existing evidence that had been highlighted during the review into the ecological consequences of gamebird releasing and management on lowland shoots in England undertaken in 2021, and the fact that Natural England has failed to keep its consenting regime up to date, putting it at risk of legal challenge regarding its legal duties relating to EU sites. Defra will use the results to inform its wider work on considering longer term regulatory solutions around gamebird releases on and around European sites. NRW should also wait to see the evidence before taking a view as to if and how to regulate gamebird releasing.*

*The licence provides the exception to the general prohibition. What is currently lawful is made unlawful unless licensed. The future of game shooting across the whole of Wales, not just on designated sites as now, would be entirely in the gift of NRW and ultimately at the whim of ministers, putting at risk the considerable economic, conservation and wellbeing benefits that shooting provides in Wales.*

*There is simply not enough evidence to justify the extent of the current proposals, and what amounts to the licensing of game shoots in Wales, as releasing is a key element of the activity.*

*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?*

*No. As I do not accept the need for common pheasant and red-legged partridge to be added to Schedule 9 of the Wildlife and Countryside Act 1981 in Wales. There is simply not enough evidence to justify the extent of the current proposals and the effective wholesale licensing of game shoots in Wales.*

*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 they be improved.*

*No. As I do not accept the need for licensing in Wales. I believe that allowing the sector to self-regulate based on GWCT guidelines for sustainable gamebird releasing is the right course of action. There is simply not enough evidence to justify the extent of the current proposals and the effective wholesale licensing of game shoots in Wales.*

*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?*

*No. As I do not accept the need for licensing in Wales. I believe that allowing the sector to self-regulate based on GWCT guidelines for sustainable gamebird releasing is the right course of action. There is simply not enough evidence to justify the extent of the current proposals and the effective wholesale licensing of game shoots in Wales.*

*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*

*No. As I do not accept the need for licensing in Wales. There is simply not enough evidence to justify the extent of the current proposals and the effective wholesale licensing of game shoots in Wales.*

*Yours sincerely*

*NAME*

*ADDRESS*

*EMAIL”*

## Annex 3 Standard text of the RSPB Cymru campaign email (English)

*“Please Regulate Gamebird Release in Wales*

*To Whom It May Concern,*

*I am writing to show my support for proposals by Natural Resources Wales to improve the regulation of non-native gamebirds released into the countryside. I know that RSPB Cymru and other organisations have growing concerns about the environmental impact of these releases, based on reviewing the same evidence used by NRW.*

*There is no evidence that the necessary changes will be achieved by relying on self-regulation and so I fully support the proposals to add Pheasant and Red-legged Partridge to Schedule 9 of the Wildlife & Countryside Act and to require a licence to release gamebirds. I hope that these proposals will be enacted by NRW and Welsh Government.*

*I share the concerns expressed by several organisations about the inadequacy of a General Licence for releases away from most SSSIs. There are sites that are sensitive to damage across Wales, especially the 91% of Ancient Semi-natural Woodland that is not protected by site designation. I ask NRW to reconsider their proposal to permit releases under a General Licence.*

*There is broad agreement that data on releases of Red-legged Partridge and Pheasant are woefully inadequate. I support the view that the proposals miss an important opportunity for NRW to gather more information about the scale and location of releases. I believe that all who release non-native gamebirds should be required to provide this data to NRW annually as a condition of any licence, to enable NRW to understand the future trends.*

*Kind regards,  
NAME*

*cc: Julie James MS”*

## Annex 4 Standard text of the RSPB Cymru campaign email (Welsh)

*“Rheoleiddiwch y Broses o Ryddhau Adar Hela yng Nghymru*

*Helo,*

*Rwy'n ysgrifennu i ddangos fy nghefnogaeth i gynigion gan Cyfoeth Naturiol Cymru i wella'r broses o reoleiddio adar hela anfrodorol sy'n cael eu rhyddhau i gefn gwlad. Rwy'n gwybod bod gan RSPB Cymru a sefydliadau eraill bryderon cynyddol am effaith amgylcheddol rhyddhau'r adar hyn, ar ôl adolygu'r un dystiolaeth a ddefnyddiwyd gan Cyfoeth Naturiol Cymru.*

*Nid oes unrhyw dystiolaeth y bydd y newidiadau angenrheidiol yn cael eu gwneud drwy ddibynnu ar hunan-reoleiddio ac felly rwy'n cefnogi'n llwyr y cynigion i ychwanegu Ffesantod a Phetris Coesgoch at Atodlen 9 y Ddeddf Bywyd Gwyllt a Chefn Gwlad ac i fynnu trwydded i ryddhau adar hela. Rwy'n gobeithio y bydd y cynigion hyn yn cael eu rhoi ar waith gan Cyfoeth Naturiol Cymru a Llywodraeth Cymru.*

*Rwy'n rhannu'r pryderon a fynegwyd gan nifer o sefydliadau ynghylch diffyg Trwydded Gyffredinol ar gyfer rhyddhau adar hela i ffwrdd o'r rhan fwyaf o Safleoedd o Ddiddordeb Gwyddonol Arbennig (SoDdGA). Mae safleoedd sy'n sensitif i ddifrod ledled Cymru, yn enwedig y 91% o Goetir Lled-naturiol Hynafol nad yw'n cael ei warchod gan ddynodiad safle. Rwy'n gofyn i Cyfoeth Naturiol Cymru ailystyried ei gynnig i ganiatáu rhyddhau o dan Drwydded Gyffredinol.*

*Cytunir yn gyffredinol bod y data ar ryddhau Petris Coesgoch a Ffesantod yn druenus o annigonol. Rwy'n cefnogi'r farn bod y cynigion yn colli cyfle pwysig i Cyfoeth Naturiol Cymru gasglu rhagor o wybodaeth am raddfa a lleoliad y rhyddhau. Rwy'n credu y dylai fod yn ofynnol i bawb sy'n rhyddhau adar hela anfrodorol ddarparu'r data hwn i Cyfoeth Naturiol Cymru bob blwyddyn fel un o amodau unrhyw drwydded, er mwyn galluogi Cyfoeth Naturiol Cymru i ddeall tueddiadau'r dyfodol.*

*Cofion gorau,  
ENW*

*cc: Julie James MS”*

## Annex 5 Standard text of the League Against Cruel Sports campaign email

### *“Consultation Response*

*Dear Natural Resources Wales,*

*I write in response to the consultation on NRW’s proposed approach to regulating the release of gamebirds (common pheasant and red-legged partridge) in Wales.*

*I strongly support the proposals to add common pheasant and red-legged partridge to Part 1 of Schedule 9 of the Wildlife and Countryside Act in Wales. Self-regulation has failed and statutory regulation for the release of non-native birds such as pheasant and partridge is a measured and proportionate response to the negative environmental impacts of mass game bird releases.*

*One of the key ways the proposals should be improved is to require all releases to be individually licensed and information on their scale and location reported to NRW. I am concerned that allowing release under a General License away from protected sites will undermine the aim of better protecting the environment. Such licences lack registration or reporting requirements and will not enable NRW to ensure compliance or monitor their impact on the environment.*

*The stated aim of the proposed new system is to protect the environment and biodiversity. This is reflected in the use of buffer zones around protected sites. I am concerned however, that the proposed 500m buffer zone is insufficient given that game birds wander beyond this limit. If we are to meet our environmental goals and responsibilities in Wales, we must do all we can to protect nature and biodiversity including taking a precautionary approach to prevent further damage being inflicted on our already suffering natural world. The release of game birds close to environmentally vulnerable areas unnecessarily risks delicate eco-systems. There is good reason to support the increasing of this buffer zone to 1km.*

*NRW has acknowledged there is a lack of evidence on the scale and effect of game bird release, particularly the impact of the release of red-legged partridge. Without appropriate reporting tools in place, along with a requirement for all shoots to report releases, it is difficult to see how an evidence gap such as this can be closed. Additionally, there remains a lack of information on how compliance with the proposed system will be ensured and enforced. Given the acknowledged low levels of compliance by the industry with existing measures, this is a significant concern to me.*

*I strongly support the need for a new approach which prioritises the environment and biodiversity, and which adds pheasants and red-legged partridges to Schedule 9. I hope that you will also take on board the above suggestions to further protect Wales’ natural environment during this time of climate emergency.*

*Kind regards,*

*NAME*

*ADDRESS*