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## NRW's proposed approach to regulating release of gamebirds in Wales.

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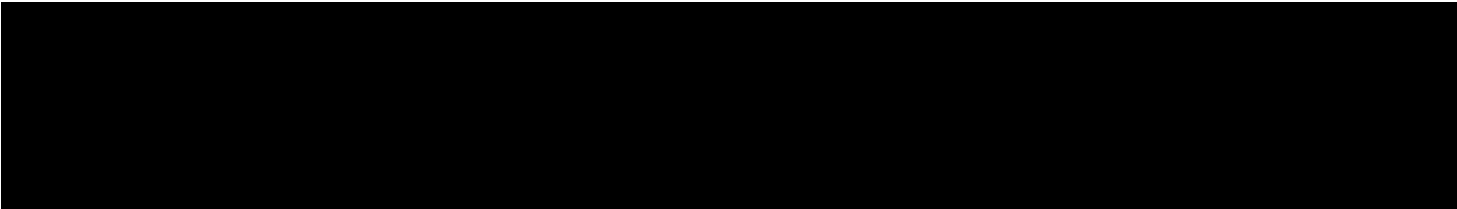


### 4) Do you agree or disagree that pheasants and red-legged partridges should be moved on to Part 1 of Schedule 9 or the Wildlife and Countryside Act 1981?

[Redacted] would prefer to see continued self-regulation for released game shoots in Wales through well designed General licences should be the way forward. We believe there is no proven case for the need for a specific annually renewed licence for releases within 500metres of a designated conservation site. Based on the available evidence, we do not deem that forced, permanent regulation is a proportionate response. We do not 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. Were NRW to recommend regulation through licensing, there is a danger it becomes a gateway to further restrictions.

Shoots can only operate effectively with the cooperation of local landowners and occupiers and this voluntary arrangement generally works well where there is good dialogue with the farmer and the shoot operator. Increasing the regulatory burden with no scientific justification could lead to unintended consequences.

Long term commitment for shoots to continue investing in productive habitat management would require assurance from Welsh Government that they recognise the conservation value of sustainable game shooting and its contribution to a thriving rural economy and the wellbeing of local communities. Members who are involved in shoots tell us, that they feel



that messaging from the Welsh Government to the shooting community has been negative, resulting in suspicion from those investing in the sector that licensing will lead to an eventual ban for those shoots within 500 metres of a SAC or SPA.

### **5) Are NRW's licensing proposals effective and proportionate?**

Provided that NRW intends to use the GWCT's sustainable releasing guidelines, which are based on peer reviewed science, as the basis for its proposed licences then we believe this to be a way forward. These guidelines are written into The Code of Good Shooting Practice, which is endorsed and supported by all the countryside organisations. There is no evidence to justify individual licensing. The reality is there is little research available to suggest that released game shoots in Wales are damaging the environment and designated sites in particular. If damage is being done NRW have means other than licencing to deal with transgression and damage to scientific interest.

Dr Joah Madden's [Evidence Report 680](#) produced as part of this consultation states

"This review makes it clear that there is currently little reliable evidence about the scale, extent, history or methods of gamebird release and management in Wales. The estimates that I can calculate are subject to large errors, of around 2.5-fold and the extrapolations that I make are often based on restricted and perhaps skewed data".

NRW in the background papers to this consultation have not considered privately funded conservation efforts in Wales that occurs as part of good practice game management.

By installing regulatory licensing, only guaranteed annually, which could be revoked at any time, those who release gamebirds in Wales may not deem investment in habitat management and other conservation practices to be sensible. Jobs connected with the sector could be lost, and there could be a negative economic impact on other associated businesses in rural areas particularly in the hospitality and accommodation sectors in rural areas of Wales.

### **6) Should partridge stocking densities be based on the same measure as that for pheasants?**

As cover crops for partridges, many of which are grown on [REDACTED] members land, add to overall biodiversity on shoots, it is wrong to regard any potential ecological damage to this habitat in the same way as pheasants released into natural woodland. Conditions within the regulations for partridge releases should therefore reflect this lower risk for ecological damage. If NRW are to go ahead with their proposals to regulate through licensing red-legged partridge release proposals should be based on a density threshold linked to the area of land they inhabit. As the partridge releases in the main occur into cover crops on arable land or improved grassland rather than semi-natural or unimproved habitats we would be happy if this was stipulated as a condition in the general licence.

**7) Should one third of available woodland be used for release (as per GWCT guidance) and is there a way to better determine this calculation?**

There is no alternative approach which can be universally undertaken and would not involve complicated mapping exercises for each release location. We therefore recommend that NRW should include the proposal that no more than one third of woodland with game interest should be used for release pens if licensing proposals go ahead.

**8) Should small scale releases not be subject to their proposals?**

We believe that small shoots releasing less than 1,000 birds should be expected to comply with the terms of a general licence. Whether shoots are small or large should not matter when it comes to following the Code of Good Shooting Practice. Should the decision be to introduce a specific licence then yes, they should be exempt.

**Conclusion**

██████████ welcome the fact that NRW has based its licencing proposals on GWCT guidelines, which are written into The Code of Good Shooting Practice. However, based on the available evidence, we do not deem that forced, permanent regulation for sites near SPA's or SACs is a proportionate response and believe it would put at risk the huge environmental and economic contribution of game management in Wales and add to the regulatory burden unnecessarily.

However, ██████████ also believe that NRW should take a more holistic approach overall through the general licences.

In view of Avian Influenza and other avian diseases knowing no boundaries in disease transmission between wild and domestic bird species, should now work closely with the Chief Vet in Wales and APHA to include a condition in the General licence, that before game birds are released, they are tested and seen by a vet, to ensure that they are free from Avian Influenza and other diseases. This process should be repeated when birds are caught up at the end of the shooting season.

Doing this has clear benefits for the wild bird population (included protected species), the game bird population, and domestic birds.

