



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

Respondent information

[REDACTED]

[REDACTED]

[REDACTED]

Who we are

This submission has been produced by the [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

Based on our scientific expertise and credibility, we regularly provide advice to such statutory bodies as Natural Resources Wales, Defra, Natural England and NatureScot. We also provide practical advice to landowners, game managers and gamekeepers on how to manage their land with a view to improving their game management practices and biodiversity. Our Advisory team have, for many years, run industry-leading best practice game management training courses. These courses are based on practical experience backed up by [REDACTED] science.

This consultation response does not intend to highlight scientific research, as much has already been passed on to NRW within its Call for Evidence.

[REDACTED]

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Executive Summary

██████ does not agree with NRW's proposals to licence the release of pheasants and red-legged partridge; primarily due to a lack of evidence to suggest such proposals are necessary and proportionate. Whilst releases on European Designated sites might require specific Habitats Regulations Assessment consideration, releases on SSSI's are already appropriately regulated and there is no evidence to suggest licensing elsewhere in Wales is necessary or warranted. ██████ does not believe that a proper impact assessment has been done to fully consider and understand the impact of the proposals. ██████ is concerned that, by trying to fix a perceived unevidenced problem, there could be far reaching, severe negative consequences for the Welsh countryside and biodiversity, the Welsh economy, and the social, mental, and physical well-being of Welsh communities.

Despite NRW's attempt to ascertain whether there is a problem with gamebird release in Wales, and if so at what scale, there is no appropriate, robust evidence that has helped to understand the scale and extent of gamebird releases in Wales. Neither has there been appropriate evidence to ascertain the current levels of compliance with existing sector standards and best practice. Therefore, ██████ does not believe that NRW's proposed approach is proportionate.

It is also apparent that NRW has not competently assessed or undertaken an impact assessment to determine how its proposals would impact the sector, the Welsh countryside and its biodiversity, the Welsh economy, or the social, mental, and physical well-being of Welsh communities. NRW's proposal could potentially be severely devastating to the above, and ██████ believes NRW has not given this due consideration.

██████ is concerned that NRW has seemingly been biased in its starting point with this consultation, assuming there is a 'hoped-for change' which is needed at an already pre-determined pace before consulting with the public on the matter. As NRW is an evidence-based organisation ██████ hopes that there is no bias within NRW. However, ██████ has found it worrying that there have been several assumptions and exaggerated negative consequences based on little evidence, whilst evidenced positive consequences have been omitted in the public facing documents. This is seemingly misleading, and could be viewed as a disingenuous attempt to influence the public.

In 2021 the Senedd declared a 'nature emergency' and outlined increased efforts to halt and reverse the decline in biodiversity. The ██████ has scientifically researched, demonstrated, and

advised how the sector can deliver privately funded conservation which can act as a delivery mechanism for biodiversity recovery. To constrict the sector by introducing licensing, when there is no evidential need, could severely hamper such conservation efforts in Wales. Therefore, [REDACTED] advises NRW to observe the precautionary principle and avoid licensing, unless there is an evidenced need, as the potential damage and impact caused by licensing has not been properly assessed and is likely to be severely detrimental.

Question 1:

What is your name?

This response has been prepared by [REDACTED]

Question 2:

What is your email address?

The email address for further correspondence is [REDACTED]

Question 3:

If you are representing an organisation, please tell us which one?

This response represents the views of the [REDACTED].



Question 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.

Response:

No, 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.

Reasoning:

Lack of supporting evidence to suggest licensing is the proportionate option.

strongly encourages NRW to assess evidence appropriately, and to withdraw its advice to Welsh Ministers to take the necessary steps to add common pheasant and red-legged partridge to part 1 of Schedule 9 of the Wildlife and Countryside Act 1981.

NRW are an evidence-based organisation, stating that “we seek to ensure our decisions, operations and advice to Government and others are underpinned by sound and quality-assured evidence” believes that it would be wrong for NRW to continue with its proposals because there is a severe lack of evidence to support them.

As an example, NRW was asked to consider the question:

‘Is there a problem in Wales and if so, what is the scale?’

To answer this question, NRW commissioned Dr Joah Madden of Exeter University to carry out an assessment of the scale and location of gamebird releases in Wales using data from the APHA poultry register and other available evidence.

agrees with Dr Joah Madden when he states in Evidence Report 680, (Madden 2023a), that “In order to accurately assess the net ecological and other effects of these activities, it is essential to have accurate data on the scale and extent of gamebird releases and management activities”.

Within that report, Dr Joah Madden also 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”.

“There is a fundamental knowledge gap revealed by this analysis: that reliable data on the scale, extent or history of gamebird releases in Wales is extremely poor”.

“A secondary knowledge gap made evident by this review is that it is unknown what are the management methods that accompany each release including their compliance with recommended best practice guidelines”.

“Without accurate information about the scale and extent of compliance with these guidelines, in conjunction with the primary knowledge gap relating to the scale, extent and history of releases, it becomes extremely difficult to reliably determine the net ecological effects of gamebird release and management in Wales”.

“There are critical gaps in the data required to make any accurate analysis about the consequences of gamebird release and management in Wales”.

NRW has not been able to accurately assess the scale and extent of gamebird release in Wales. Additionally, NRW has also not been able to accurately assess the scale or extent of compliance with current guidelines. Therefore, NRW has not been able to accurately assess the net ecological and other effects of gamebird release and management activities in Wales. How then does NRW conclude in its consultation document that “having considered the evidence and reviewed the current situation in Wales we feel that there is a problem in Wales and that change is needed”?

██████ does not believe there has been sufficient evidence and we conclude that NRW has not been able to, based on the evidence currently available, assess if there is a problem in Wales and if so, what is the scale?

Lack of an appropriate Impact Assessment for proposed licensing.

██████ believes that there is not enough conclusive evidence to determine whether there is a problem caused by gamebird release in Wales. However, NRW seemingly have started this consultation process from a biased assumption that there is a problem which needs addressing.

Until further evidence exists to fill the highlighted evidence gap in Wales, ██████ views the proposed licencing approach as overly precautionary and not a proportional response. Annual

licensing is not an appropriate mechanism for gamebird release and has the potential to seriously negatively impact much positive work which occurs because of current game management practices in Wales. Not only do we highlight the environmental aspects which could be negatively impacted but we also highlight social well-being and economic aspects which could be negatively impacted.

Funding habitat management and conservation work becomes unviable - [REDACTED] believes that an annual licence will undoubtedly negatively impact on the amount of privately funded conservation work undertaken by shoots in Wales. The last Value of Shooting survey (PACEC ,2014) estimated that shooting conserved a total of 380,000 hectares of land in Wales. It also estimated that that shooting invested £7.4 million on conservation annually and supported the equivalent of 490 paid full-time conservation jobs.

Given the declared nature emergency in Wales, [REDACTED] believes that the gamebird release sector can be harnessed to deliver much more in the future. However, alternatively without this investment it appears the Welsh countryside could be in much worse condition when considering the scientifically proven conservation benefits shooting delivers could be lost.

For example, shoots retain and create more woodland (Firbank, 1999), and better manage their woodlands as there is more open tree canopy structure and greater ground cover of herbaceous plants (Draycott, 2005) and (Draycott, 2008). There is also better woodland edge-zone associated with shoot woodlands (Ferris & Carter, 2000) and (Woodburn & Sage, 2005). Conifer woodlands on shoots often offer higher biodiversity value than those not associated with shoots (Sage, 2018). Shoots retain and create more hedgerows (Firbank, 1999) and (Draycott, 2012) and plant game covers which boost biodiversity (Ewald, 2004), (Sage, 2005) and (Parish, 2008). Additionally, shoots provide supplementary feeding through the winter and hungry gap which boosts biodiversity (Sanchez-Garcia, 2015), (Siriwardena, 2007), (Ewald, 2019), (Stoate, 2017) and (Sage, 2018). Shoots also undertake predation management proven to be beneficiary to a suite of non-game species (Roos et al. 2018), (Aebischer, 2009), (Sotherton, 2009), (Capstick, 2019), (Stoate, 2017) and (Fletcher, 2010).

The financial investment required for such conservation efforts could be severely hampered if shoots in Wales can only rely on an annual licence to support their business plans. Regardless of the investment, shoot employees are likely to leave Wales in search of more secure employment in England which is likely to make many shoots and their associated conservation efforts unviable. It makes no financial sense to invest in an activity which would benefit the

ground in five years' time (as an example) when there is no guarantee of shooting in the second year. Not only that but the annual licence is extremely fragile and could be revoked at any time. It is very unlikely that a landowner, shoot operator, business man or woman is going to invest in something without any longer term insurance. For example, 61% of 57 survey respondents said that they would not continue financing conservation efforts associated with their shoot if licensing made gamebird releasing unviable. Only 11% stated that they would continue to do so and 28% did not answer.

Additionally, we have seen the fragility of GL43 in England and now Defra is facing severe financial repercussions (in the figure of millions) from shoots which have invested for the coming season only to have the licence changed at the last minute.

Undoubtedly, the uncertainty created by annual licences in Wales will cause a migration of gamekeepers from rural areas of Wales to England as they seek secure employment to support their families. If your job and family home was tied to a business that might not be able to operate next year or the year after, would you look for more secure employment elsewhere? The knock-on effect of this is far reaching, with small rural primary schools potentially impacted as children are withdrawn from remote rural locations. It should not be forgotten that these rural communities currently offer an opportunity to encourage the Welsh language in future generations and this could be negatively impacted. There is also a direct impact on future careers for young Welsh people as the countryside and land management sector, in much need of improved recruitment, could be hampered by annual licences. This is in direct conflict with the Well-being of Future Generations (Wales) Act 2015.

When considering the bigger picture; the Welsh Government plans to plant 86 million trees across 43,000 hectares in Wales. Who will plant these trees if approximately 490 full time conservation jobs are lost? Who will manage these future woodlands? Who will manage the ever-growing grey squirrel population which is already estimated to cost Welsh Government £914,500 annually. The annual value of ecosystem services provided by Welsh woodlands, for carbon, timber, recreation, and air quality services was estimated as £606.3 million in 2015. To reiterate, who is going to manage the grey squirrel population which damages this resource, and who is going to manage the deer population and its detrimental impact on woodlands in Wales, if most professionals with a firearms certificates have moved to England?

The financial risk associated with annual licences might cause shoots to stop operating. Regardless of the financial risk, shoot employees are likely to leave in search of more secure

employment which is likely to make many shoots unviable. In contradiction to legislation set up to protect the Welsh language and opportunities to practice it, annual licences could severely disrupt opportunities for the rural Welsh community to meet and practice the Welsh language. Often through the autumn and winter, shoot days are the key social interaction which many Welsh men and women rely upon. Furthermore, restrictions could deter foreign tourists traveling to Wales in the autumn and winter to shoot. This could also restrict opportunities for the Welsh language to be heard and shared.

██████████ would remind NRW to review the ██████████ 'Community Spirit' Report sent as part of the Call for Evidence. This report highlights how shooting delivers many social well-being benefits and highlights how shooting delivers the objectives of the Well-being of Future Generations Act (Wales) 2015, improving the social, economic, environmental and cultural well-being of Wales. A Forest Research report in 2021 described how being outside in woodlands could save Wales £6 million in mental health care costs. It should be obvious how important shooting is for communities in Wales, who use it as an opportunity to socialise and exercise outside. It should also be noted that those involved include those who are retired or live remotely and the benefits of being involved in shooting is magnified.

According to the PACEC Value of Shooting 2014 survey, shooting provides £75 million GVA to the Welsh economy per year and supports the equivalent of 2,400 paid full-time jobs. The knock-on effects of the proposed licensing could potentially be seriously detrimental to the hospitality and catering sector in Wales. If Welsh shoot owners and operators decide that annual licences, which could be revoked at any time, are not worth investing in then many shoots will fold. The ripple effect of this could be severely detrimental to the Welsh economy. The tourism trade through the autumn and winter could suffer dramatically. These impacts should not ever be taken lightly as this is people's jobs, livelihoods, and homes on the line. It is extremely questionable that NRW are proposing these licences without fully understanding or undertaking an impact assessment of the potential consequences.

Potentially biased NRW approach:

Starting from a potentially biased assumption - Stakeholder meetings

On the 6th of December 2023, in a Gamebirds Stakeholder Meeting to inform stakeholders of NRW's work on 'Developing an approach to regulating the release of gamebirds in Wales', NRW presented a slide titled 'Background to the Project'. This slide worryingly pointed out

how NRW were preparing and consulting on an appropriate phased approach for regulating the release of gamebirds in Wales, and then went on to ask, 'What is the scale of the problem in Wales?'.

As a proposed starting point ██████ found this concerning. Should it not have been that NRW should start by ascertaining whether increased regulation is necessary first? Should it not also have been that NRW started by ascertaining if there was a problem in Wales rather than beginning by assuming that there was? Once this was pointed out to NRW employees they changed the wording prior to the slides being sent out to stakeholders, however it highlights a potential biased starting point for an evidence-based organisation.

Starting from a potentially biased assumption – Consultation

NRW describe on the consultation website how this consultation is to ascertain the views of the public on a new regulatory approach. We understand therefore that so far, the views of the public have not been canvassed prior to the consultation.

However, within the consultation document NRW state “reliance on voluntary approaches alone seems unlikely to deliver the hoped-for change at the required pace”. ██████ ask NRW who it is referring to that is hoping for change? What is the hoped-for change required, given that this is a consultation to ascertain the public's views? What pace is required and why? It seems strange for NRW to already perceive change is required, given that it is evidence-based and that it is only now consulting with the public? It seems a biased starting point for a consultation.

If NRW are referring to those hopes of stakeholders from its previous call for evidence, ██████ would note that, in theory, the weighting of stakeholders' views is expected to be balanced and neutral, given that at least seven of the fourteen mentioned stakeholders were likely demonstrating the positives that sustainable game management can deliver.

Consultation Document – Claims of poor sector self-regulation

NRW's consultation document, and Annex 3 discussed below, have been produced to inform the public and we believe these documents to be overly disingenuous in how information is cherry picked, often incorrectly or based on assumptions, and seemingly to highlight the perceived negatives without balancing these views with perceived positives where they exist.

Within the consultation document, NRW give examples where it suggests there is evidence that self-regulation does not work:

APHA Register as an example of poor compliance:

██████ cannot argue that sector compliance with the mandatory APHA poultry register is good. However, for NRW to state that “the report we commissioned estimated that the levels of compliance with the mandatory register was likely to be somewhere between 20-73%” is incorrect and a clear misrepresentation of the data. The actual estimated figure within Madden 2023a was “derived compliance values of between 29-73%”.

As described in the consultation document, the reasons for perceived poor compliance with APHA registration is largely speculative. The conclusion should therefore be to find out why, before assuming there is a problem or an unwillingness from the sector to comply.

Stocking Best Practice Guidelines as an example of poor compliance:

The consultation document refers to adherence to Codes of Practice and Best Practice Guidelines and states that “critics argue that there is little evidence to demonstrate how widely they are adopted by shoots”. ██████ reminds NRW that absence of evidence is not evidence of absence, and that although there may be little evidence to demonstrate whether Codes of Practice are adopted, there is also little evidence to suggest they are not.

Whilst Madden 2023a suggests that in England approximately only 15% of release pens are stocked within best practice guidelines, this suggestion is based on three key scientific papers, Sage et al. (2005), Neumann et al. (2015) and Hall et al. (2021).

██████ highlight that the current best practice guidance has only been available since publication in 2006. Even with publication in 2006, it is unrealistic to assume that every shoot across the country would be able to financially invest in extending or creating new release pens to accommodate and adhere to best practice guidelines within two years. Therefore Sage et al. (2005) based on data collected in 1988 and 2004, and Neumann et al. (2015) based on data collected in 2006 and 2008 are both outdated when referring to current stocking density best practice.

That only leaves Hall et al. (2021), based on data collect at 65 release pens in 2016 and 2017. It should also be noted that 16 of these pens were surveyed in both years to reach the 65 stated number. This research was conducted assess impact upon invertebrates and not as a sample to determine adherence to stocking densities, therefore for stocking density purposes we would

not expect the density to be vastly different in the sixteen pens which were surveyed in consecutive years and for the purpose of reviewing stocking density we would not wish to double count. Therefore, this sample size, in relation to stocking density should be viewed as 49.

Therefore, rather than identifying the lack of stocking density data (especially in Wales) as an evidence gap, NRW are apparently happy to use this approximate statistic based on a sample size of 49 pens in England in 2016 to 2017 to assume current practices in Wales. Furthermore, based on basic extrapolations, this sample reflects approximately 0.2% of the population released in the UK in 2016. ████████ recommends this data is viewed as an evidence gap rather than used as a basis to assume low adherence with best practice stocking densities.

In addition, Madden also concludes “A more detailed and stratified sample of pen densities is required, specifically with a focus on Welsh shoots, to understand levels of compliance in Wales”.

████████ therefore disagrees with NRW when it states, “the broad conclusion must be that compliance with voluntary codes of practice and best practice guidelines may be low and patchy”, because there is a lack of evidence to support this claim.

Voluntary phase out of lead shot as an example of poor compliance:

NRW claim that poor compliance with sector driven, voluntary phase out of lead shot is evidence that self-regulation is not working. This voluntary phase out is approximately halfway through a five-year period and has been hampered by disruption caused by the Covid-19 pandemic, Avian Influenza and the cost of living crisis in the last three years.

NRW references a study completed by the University of Cambridge, and partially funded by anti-shooting organisations, which found 94% of pheasants sampled contained lead shot. However, we are led to believe that this study was scientifically flawed, with 121 out of 356 carcasses omitted from the results because they could not find any shotgun pellets. If these carcasses were included in the calculations, it would demonstrate that 62% of the total sample were shot with lead ammunition.

Given the timing of the voluntary phase out, the disruption faced by the sector and the associated difficulties with cartridge manufacture and market change (only approximately 1/6 of the required non-lead alternatives were available in 2022) it is not realistic to use the voluntary phase out of lead ammunition as an example of poor compliance or poor self-regulation.

It is indeed wrong of NRW to explicitly state that this consultation “Lead shot and its environmental impact is not within the scope of this project” and then use lead shot as an example of poor compliance to inform the public.

Positive examples of self-regulation missing from consultation:

The shooting sector has complied with the voluntary seasonal restraint for shooting woodcock. This voluntary restraint was asked for to minimise the risk of resident woodcock being shot, by asking those that shoot to avoid shooting woodcock until late November/ early December when the majority of winter migrants have arrived. A wing collection, citizen science project undertaken by BASC, demonstrated that 93% of woodcock shot were done so within the voluntarily restricted season. Furthermore, in Wales this figure rose to 96%.

This example of the sector’s commitment to voluntary self-regulation was unfortunately missed by NRW in its consultation document.

The gamebird sector encouraged shoots to reduce use of antibiotics in 2017 and 2018 to bring the sector in line with action being taken across all farm animal sectors in the UK. In the first year of this voluntary push figures endorsed by the Veterinary Medicines Directorate (VMD) showed that antibiotics used in gamebirds were voluntarily reduced by 36% in 2017 compared to 2016. This included a 53% reduction for those administered in gamebird food. The 36% reduction surpassed the official 25% target for that year. Following this success, the sector further reduced its use in 2018 by 51% compared to 2016, incorporating a 70% reduction for those administered in gamebird food. Whilst there was a small increase of 7% in 2019 due to very wet weather during the breeding season this again demonstrates the sectors willingness to improve, address problems and self-regulate effectively.

This example of the sector’s commitment to voluntary self-regulation was unfortunately missed by NRW in its consultation document.

As discussed previously, the sector has faced severe disruption since the Covid 19 pandemic. However, prior to the pandemic there was a push to demonstrate self-regulation and the British Game Alliance (now the British Game Assurance) was formed in May 2018. Between its formation and the Covid 19 pandemic the BGA amassed approximately 700 paid members who enter the assurance scheme to demonstrate they were undertaking best practice management inline with Codes of Best Practice and high standards.

The [REDACTED] created the Shoot Operator's Certificate for those managing shoots to demonstrate that they were aware of and understood best practice game management. Shoot operators undertake a test to demonstrate their understanding and are awarded a certificate if they pass the test. To date 1,065 operators have passed the test in the last three and a half years.

[REDACTED] Welsh Shoots Survey April 2023:

[REDACTED] asked those who provide shooting in Wales to respond to a short survey in April 2023. The survey was designed to obtain evidence specific to Wales and gamebird releasing in Wales. Whilst a small data set still demonstrates an evidence gap in Wales, we believe that data is better than no data, whilst recognising the limitations of such surveys when compared to peer reviewed, published science.

The survey can be found here: https://www.surveymonkey.com/stories/SM-LnMnevqNYaT8_2FZFm5mcyQ_3D_3D/

We had 57 respondents to the survey and the responses can be found below:

We asked the following questions:

- 1) Have you read the Code of Good Shooting Practice?
 - 98% respondents answered Yes
 - 2% responded No
 - All responded
- 2) Have you undertaken woodland management on your shoot?
 - 7% responded never
 - 50% responded within the last 5 years
 - 12% responded within the last 10 years
 - 11% responded over 10 years ago
 - 19% did not respond
- 3) Have you planted any woodland on your shoot?
 - 47% responded Yes
 - 26% responded No
 - 27% did not respond

- 4) Have you planted any hedgerows on your shoot?
 - 35% responded Yes
 - 37% responded No
 - 28% did not respond
- 5) Have you created additional cover such as game cover on your shoot?
 - 63% responded Yes
 - 7% responded No
 - 30% did not respond
- 6) When do you undertake predation management on your shoot?
 - 4% responded never
 - 61% responded before and during the bird breeding season
 - 9% responded when you release birds and through the shooting season
 - 26% did not respond
- 7) Do you continue feeding post-season through to April?
 - 7% said No
 - 65% responded Yes
 - 28% did not respond
- 8) How many pheasants do you release on your shoot?
 - 35% responded less than 1,000 birds
 - 18% responded between 1,000 – 5,000 birds
 - 12% responded between 5,000 - 10,000 birds
 - 7% responded greater than 10,000 birds
 - 28% did not respond
- 9) At what stocking density do you release pheasants?
 - 60% responded less than 1,000 birds per hectare of release pen
 - 12% responded at 1,000 birds per hectare of release pen
 - 28% did not respond
- 10) How many red-legged partridge do you release on your shoot?
 - 39% responded less than 1,000 birds
 - 11% responded between 1,000 – 5,000 birds
 - 12% responded between 5,000 – 10,000 birds
 - 38% did not respond

11) Do you believe game management is an important driver for conservation?

- 72% responded Yes
- 28% did not respond

12) Would you continue financing such measures if licensing made gamebird releasing unviable?

- 61% responded No
- 11% responded Yes
- 28% did not respond

Additional data collected demonstrated that:

- Of those that had planted woodland, an average of 18 hectares had been planted per shoot, totalling an average of 2% of their land area.
- Of those that had planted hedgerows, an average of 426m were planted per shoot.
- Of those that had planted additional cover, an average of 13 hectares had been planted per shoot, totalling an average of 3% of their land area.

The above survey answers, caveated with the limitations of such a survey, demonstrates a fairly positive representation of game management in Wales. The majority (72%) of survey respondents released following best practice guidelines relating to stocking density. This helps to potentially minimise seven of the twelve associated negative consequences of gamebird management (Sage et al. 2020). These seven density dependent negative consequences are all at a localised scale. Furthermore, 65% of respondents stated they supplementary feed through the hungry gap until April, 61% undertook predation management before and during the bird breeding season at the most crucial time of year for other species to benefit, and 63% of respondents have created additional cover such as game cover. These are all ways of maximising the proven landscape scale benefits of game management. This is without mentioning the 47% who have created additional woodland and the 73% who undertake woodland management.

The findings of this small survey are contrary to NRW's claim that "the broad conclusion must be that compliance with voluntary codes of practice and best practice guidelines may be low and patchy".

██████ believes there are many evidence gaps in Wales, and that it is not possible to determine the scale, quantity, and quality of game management in Wales due to the current lack of evidence. However, this small survey highlights the complexities of the situation on Wales and counters NRW's claim that "there is a problem in Wales and that change is needed".

Annex 3 - A deceptive rapid review

The use of the phrase 'Rapid Review' is misleading, and may also potentially confuse the public, encouraging them to think Annex 3 is more scientific and systematic than it is. A 'Rapid Evidence Assessment' is the formal name of a systematic review procedure; however, this report does not engage in that process and this report is not a review at all in any scientific sense because virtually no primary evidence is sourced.

██████ highlights that, with regards to the approach taken, Sage et al. 2020 is the only peer reviewed and published scientific paper, whereas Mason et al. is an internally commissioned RSPB report, and Madden & Sage is a Natural England commissioned report. There is no mention of this within the wording of Annex 3, which again is potentially misleading as it does not, in the Trust's view, weight the 'reviews' appropriately.

Whilst NRW do acknowledge the use of anecdotal evidence within the first paragraph of the Summary of Results, the ██████ does not believe NRW go far enough to highlight that some of the 'impact pathways' referred to in this report are supported *only* by anecdotal evidence, or sometimes without any kind of evidence. This is seemingly a severe flaw.

To concisely provide feedback on Annex 3, ██████ refers specifically to Table 1 within the review. There are many assumptions and some straightforward speculation about possible impacts which generally is not clearly identifiable. Overall, it appears NRW have easily speculated on potential negative impacts, with no real evidence, whilst notably omitting more obvious, evidence potential positive impacts.

Bats - There is no direct evidence that flying insects are reduced around release pens. In any case, the possible pen area affected compared to a bats potential feeding range suggests this might be an unlikely mechanism for a negative effect on bats in most circumstances.

Additionally, if anecdotal evidence is to be accepted, then it is just as likely that woodland

management and indeed gamebird brood rearing habitats would provide enhanced landscape scale bat foraging habitat.

Water vole – There is no mention of the potential positive for predation management and widely practiced American mink control practiced as part of good game management. Indeed, it is often this practice, headed by those involved in game management that has been instrumental in water vole conservation and reintroductions.

Red Squirrel – There is no mention of the potential positive for predation management and widely practiced grey squirrel control practiced as part of good game management.

Dormouse – Given that there is no evidence that gamebirds have had populations impacts on small mammals (Davey, 2008) it is much more plausible that habitat management i.e., managing woodlands to create structural diversity, and creating woodlands and hedgerows to improve landscape connectivity, is much more likely to have a beneficial impact on dormouse in Wales.

Hedgehogs – This is a very clear example of pre-conceived bias towards game management, and a clear demonstration of the dangers of assumptions and reviewing reviews, where original suggestions are lost amongst numerous references. To state “Poorer quality feed may lead to poor nutrition and poor health if species consuming grain, but unlikely to be doing so” as the suspected negative effect shows a clear lack of understanding. Firstly, it is incorrect that both Sage et al. 2020 and Mason et al. 2020 list hedgehogs as occasional visitors to pheasant hoppers, as it was the Madden and Sage, 2020 rather than Sage et al. 2020 which documented hedgehogs. However, documenting hedgehogs in this way without context is also misleading as the Sanchez-Garcia et al. (2015) referred to documented hedgehog as a species ‘photographed’ at a feeding site i.e., not necessarily feeding from a hopper. This is the same as documenting that a woodcock or dog walker has been caught on a trail camera placed near a feed hopper and concluding that they too are eating grain. In fact, in the referenced study, hedgehogs were photographed at only one of the three study sites, and on only <0.1% of the photographs taken. The [REDACTED] therefore advice that it isn’t plausible that ‘poor quality grain’ could be a negative effect of releasing on hedgehogs. Indeed, if they were to consume grain it would likely be because they need to, during heavy frosts as an example, and this could be viewed as a positive. If NRW are happy to accept anecdotal ecological assumptions, it is highly plausible that increased habitat heterogeneity and enhanced invertebrate-rich habitats created for gamebirds might well have a very positive effect on hedgehog numbers.

Rodenticide - Secondary killing of mammals and birds through bad practice rodenticide use is not necessarily associated with releasing gamebirds. Rodenticide industry surveys (CRRU) show that there are higher levels of attendance and engagement in training courses for best practice use of professional grade rodenticides in the gamekeeping sector than the farming sector.

Brown hare – The fox is a significant predator of brown hares, and effective control of fox density leads to substantially higher hare densities, given suitable habitat (Reynolds et al. 2010). In [REDACTED] studies at Royston and Loddington brown hare numbers approximately doubled in response to good game management and associated fox control (Short et al. 2012). This positive effect of game management has been worryingly completely disregarded within this summary for Section 7 species.

Avian Influenza – Whilst transmission of Avian Influenza from gamebirds to seabirds is plausible, [REDACTED] highlights that there is no evidence and believes the risk has been exaggerated. Generally, seabirds are a source of AI.

Transmission of AI from released gamebirds (although mainly from associated released mallard) to wildfowl is considered a potential risk at feeding locations but this is not mentioned in the report. There is gamebird sector guidance on feeding gamebirds where wildfowl occur which should have been included in this report.

Transmission of AI from gamebirds to relevant uplands species is speculative and vague. Generally, grouse species are not considered susceptible to AI. Some raptors are potentially vulnerable to transmission of AI from scavenging but in our opinion the specific risk to hen harrier via transmission from gamebirds is very low.

As a general comment on Avian Influenza, transmission from gamebirds to other bird species was not looked at in the 2020 reviews. The emerging evidence base has not been properly considered in this report and the information included as such is not reliable.

Resource competition - Whilst Mason et al. (2020), which is not peer reviewed, suggests resource competition with farmland birds could be a potential negative consequence, the [REDACTED] disputes this as a realistic mechanism for negative effect of releasing on farmland bird populations. [REDACTED] suggests, based on peer-reviewed science, that in most circumstances it is likely that the individual, and combined effects of additional habitat provision, supplementary

feeding and predation management associated with game management will most often lead to positive consequences for farmland bird populations.

Lapwing – It is again telling that the only assumption NRW has included is a proposed negative effect. There is scientific evidence and grey literature from project reports demonstrating that lapwing benefit from predation management carried out by game managers, both in the uplands and lowlands and both associated with wild and released gamebird management. To include “Carcass availability on generalist predators” and assume a negative at the landscape scale is particularly biased. There are areas of Wales where breeding lapwing colonies are still present solely because game management and associated predation management occur. This review totally disregards and omits positive effects associated with game management.

Kestrel – As discussed above, secondary poisoning is not necessarily associated with releasing gamebirds. Furthermore, habitat creation such as enhanced margins are recognised as excellent kestrel and barn owl prey habitat. These benefits are again omitted from this report.

Overshooting greys partridge. On releasing estates with grey partridges there are clear protocols for avoiding shooting grey partridges on red-legged partridge driven shoot days, including financial fines for any shot grey partridge. As a minimum, these protocols should be referred to in the table. However, to suggest three potential negative effects for grey partridges, without recognising any the beneficial effects associated with game management is highly questionable and misleading. It is highly likely that grey partridge only exists in Wales where game management occurs.

Invertebrates - There is no evidence that invertebrates are affected by gamebird release away from release sites. However, it is likely that ground invertebrates may be affected in other focal places where released birds congregate at similar densities to release pens, such as feed points or in hedgerows close to release pens or alongside fed game crop plots. However, the table in the report suggests that landscape effects are possible when there is no evidence to support this claim and in the [REDACTED] opinion this is not plausible. It is possible that niche invertebrate habitats adjacent to release sites (e.g. dead wood) might be affected but again there is no evidence and this is not referred to in this report.

Arable plants - Whilst Mason et al. 2020 may suggest the alternative, there is no evidence that ground flora away from release sites, or other areas where released birds congregate (see above), are affected by gamebird release. The report does not indicate landscape effects, but it

does suggest patch effects, e.g., whole woodlands or unimproved grassland areas. [REDACTED] disagrees with this assumption and the available evidence suggests this is unlikely.

Reptiles and amphibians - While there is no evidence of an effect of releasing on either of these groups, it is plausible that where gamebirds are released directly into areas with reptiles, predation of those reptiles is possible. The tables do a good job of summarising [REDACTED] guidelines on how to avoid possible conflicts. It seems arguably less plausible but not impossible that a conflict with amphibians might occur.

Lichens and bryophytes - There is limited evidence for plausible patch effect through atmospheric enrichment. However, it should be noted that the reference cited Bosanquet 2018 did not follow basic scientific sampling procedure and should be viewed cautiously. For fungi there is no evidence but plausible local impact of releasing on fungi around release (or similar) sites only.

[REDACTED] argue that the key landscape scale negative impacts concluded in this report are in fact mostly based on assumptions and, or poor evidence. [REDACTED] believes that the risk of Avian Influenza transmission from gamebirds, whilst plausible, has been exaggerated and is based on assumptions rather than evidence. Furthermore, the conclusions drawn of a landscape scale effect of predation of reptiles is again based on assumptions rather than evidence and again exaggerated to seem like a common, landscape scale problem across a wide range rather than a specific problem at local levels. Finally, a conclusion is drawn about raptor killing, yet the issue is not referred to in the main table apart from with regards to hen harrier (for which illegal persecution is not commonly linked with released gamebirds) and is mentioned only in passing in the text. Based on a review of the Hughes et al. 2021 paper, [REDACTED] views raptor killing as weakly associated with gamebird releasing. The grouping of wild game management and released game management in this context is often unhelpfully not properly differentiated or explored.

Whilst the [REDACTED] agrees with most of the other conclusions drawn in this report, we disagree with the key point in paragraph three of the conclusions section relating to protected sites, which is central to the report's aims. There are too many poor assumptions based on a lack of evidence and a lack of understanding, and too many omissions of evidenced positive impacts. [REDACTED] believes that this report exaggerates the negatives and minimises the positives in a way that could be viewed as biased and misleading to the public. [REDACTED] believes that, on balance,

has conducted a proper impact assessment of the consequences of its proposals with regards to the Welsh environment or with regards to Welsh communities and the Welsh economy. Furthermore, [REDACTED] believes that NRW has approached this consultation from a potentially biased standpoint, have unwittingly mislead the public within the consultation and seemingly exaggerate negative impact assumptions, whilst omitting evidenced positive impacts within its assessment of the impact on Section 7 species habitats and species in Annex 3.

Given that the available science demonstrates that negative consequences are often associated with the birds themselves at a local scale (and these can often be minimised), and that positive consequences are often associated with management practices for gamebirds at a landscape scale (and these can often be maximised), (Sage et al. 2020) we believe there can be an achievable, demonstrable net gain for biodiversity, which could be achieved by most shoots in Wales.

In 2021 the Senedd declared a 'nature emergency' and outlined increased efforts to halt and reverse the decline in biodiversity. The [REDACTED] has scientifically researched and demonstrated how the shooting sector can deliver privately funded conservation which can act as a delivery mechanism for biodiversity recovery. To carelessly constrain the sector by introducing licensing, when there is no evidential need, could severely hamper such conservation efforts in Wales. For this reason, [REDACTED] advises NRW to observe the precautionary principle and avoid licensing, unless there is an evidenced need, as the damage and impact caused by licensing has not been properly assessed.

Question 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?

[REDACTED] does not agree with NRW's proposals to licence the release of pheasants and red-legged partridge; primarily due to a lack of evidence to suggest such proposals are necessary and proportionate. Whilst releases on European Designated sites might require specific consideration, releases on SSSI's are already regulated and there is no evidence to suggest licensing elsewhere in Wales is necessary or warranted. [REDACTED] does not believe that a proper impact assessment has been done to fully consider and understand the impact of the proposals. [REDACTED] is concerned that, by trying to fix a perceived unevidenced problem, there could be far

reaching, severe negative consequences for the Welsh countryside and biodiversity, the Welsh economy, and the social, mental, and physical well-being of Welsh communities.

Based on the above considerations, [REDACTED] believes that self-regulation is the best way for the sector to demonstrate compliance with best practice guidelines. [REDACTED] encourages all shoots to demonstrate a net gain to biodiversity through best practice game management. [REDACTED] also encourages all shoots to register on the mandatory APHA poultry register.

However, for clarity [REDACTED] recommends the following, IF NRW goes ahead with its proposals:

Whilst [REDACTED] is encouraged that NRW have based its proposals on peer-reviewed, scientific research which underpins the Code of Good Shooting Practice it is still severely concerned that the proposal could be severely detrimental; these concerns are outlined below. Regardless of any proposals all shoots should adhere to best practice guidance and the Code which all the Countryside Organisations endorse and support. If shoots are to be sustainable and deliver a net biodiversity gain, then they should be adhering to the best practice guidance.

[REDACTED] does not believe that annual licences are workable, furthermore the proposals would not be effective in achieving NRW's objectives. It cannot be the objective of NRW to shut down the sector as this could be severely detrimental to the Welsh countryside and its biodiversity, the Welsh economy, and the social, mental and physical well-being of Welsh communities. The proposed annual licensing potentially risks the above due to a lack of business security for shoot owners and operators and a lack of employment security for those involved. Despite best interests, it is likely that annual licences could make many shoots in Wales unviable.

[REDACTED] believes that IF NRW does go ahead with its proposals it would need to find a way of extending the time-frame licences are in place for to add a layer of insurance and security for shoot owners, operators, and employees. Additionally, there would need to be an agreement in place to avoid licences being revoked as currently they are too fragile for shoot businesses to be able to safely invest. Finally, there would need to be an appropriate appeals procedure included. Currently, we believe that the legislation in place does not accommodate these required measures and therefore, unless changed, the proposals are not workable, not effective, and not proportionate.

Question 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.

■■■■■ does not agree with NRW's proposals to licence the release of pheasants and red-legged partridge; primarily due to a lack of evidence to suggest such proposals are necessary and proportionate. Whilst releases on European Designated sites might require specific consideration, releases on SSSI's are already regulated and there is no evidence to suggest licensing elsewhere in Wales is necessary or warranted. ■■■■■ does not believe that a proper impact assessment has been done to fully consider and understand the impact of the proposals. ■■■■■ is concerned that, by trying to fix a perceived un evidenced problem, there could be far reaching, severe negative consequences for the Welsh countryside and biodiversity, the Welsh economy, and the social, mental, and physical well-being of Welsh communities.

Based on the above considerations, ■■■■■ believes that self-regulation is the best way for the sector to demonstrate compliance with best practice guidelines. ■■■■■ encourages all shoots to demonstrate a net gain to biodiversity through best practice game management. ■■■■■ also encourages all shoots to register on the mandatory APHA poultry register.

However, for clarity ■■■■■ recommends the following, IF NRW goes ahead with its proposals:

As cover crops for partridges 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.

Most commonly, red-legged partridges are released from pens directly into improved habitat i.e. cover crops on arable land or improved grassland. Sometimes they are also 'hard' released

into these habitats. They do not usually therefore have the same potential to do damage to semi-natural or unimproved habitats as pheasant do when released into woodland.

Alternatively, and occasionally, red-legged partridges are sometimes released alongside pheasants into large release pens within woodland. However, we regard this as poor practice due to several concerns regarding disease and welfare considerations. We believe NRW should therefore not consider releases for red-legged partridges on a density per hectare of release pen.

IF NRW are to go ahead with its proposals to regulate through licensing, ██████ recommend that red-legged partridge release proposals be based on a density threshold linked to the area of land they inhabit, with advice that releases occur in to conventional crops or specific cover crops on arable land or improved grassland and that sensitive semi-natural habitats are avoided.

Question 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?

██████ does not agree with NRW's proposals to licence the release of pheasants and red-legged partridge; primarily due to a lack of evidence to suggest such proposals are necessary and proportionate. Whilst releases on European Designated sites might require specific consideration, releases on SSSI's are already regulated and there is no evidence to suggest licensing elsewhere in Wales is necessary or warranted. ██████ does not believe that a proper impact assessment has been done to fully consider and understand the impact of the proposals. ██████ is concerned that, by trying to fix a perceived unevidenced problem, there could be far reaching, severe negative consequences for the Welsh countryside and biodiversity, the Welsh economy, and the social, mental, and physical well-being of Welsh communities.

Based on the above considerations, ██████ believes that self-regulation is the best way for the sector to demonstrate compliance with best practice guidelines and encourages all shoots to demonstrate a net gain to biodiversity through best practice game management. ██████ also encourages all shoots to register on the mandatory APHA poultry register.

However, for clarity [REDACTED] recommends the following, IF NRW goes ahead with its proposals:

Whilst [REDACTED] sympathise with NRW that a stricter calculation would be preferable, 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 NRW goes ahead with its licensing proposals.

The [REDACTED] guidelines state:

“The ‘total woodland area’ used in this calculation could include scrub patches, substantial hedgerows with trees, shelter belts and new woodland plantings, **but it should not include the central part of large woodland blocks where there is no game interest**”. We deem this guidance to be appropriate given the need for a one size fits all approach which is easy to understand and adhere to.

Question 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

[REDACTED] does not agree with NRW's proposals to licence the release of pheasants and red-legged partridge; primarily due to a lack of evidence to suggest such proposals are necessary and proportionate. Whilst releases on European Designated sites might require specific consideration, releases on SSSI's are already regulated and there is no evidence to suggest licensing elsewhere in Wales is necessary or warranted. [REDACTED] does not believe that a proper impact assessment has been done to fully consider and understand the impact of the proposals. [REDACTED] is concerned that, by trying to fix a perceived unevicenced problem, there could be far reaching, severe negative consequences for the Welsh countryside and biodiversity, the Welsh economy, and the social, mental, and physical well-being of Welsh communities.

Based on the above considerations, [REDACTED] believes that self-regulation is the best way for the sector to demonstrate compliance with best practice guidelines and encourages all shoots to demonstrate a net gain to biodiversity through best practice game management. [REDACTED] also encourages all shoots to register on the mandatory APHA poultry register.

However, for clarity [REDACTED] recommends the following, IF NRW goes ahead with its proposals:

[REDACTED] have provided the sector with our sustainable releasing guidelines based on our scientific research. These guidelines are endorsed and supported by all the Countryside Organisations. We therefore do not believe that small shoots releasing less than 1,000 birds should not be expected to adhere to these guidelines. Whether shoots are small or large should not matter when it comes to following the Code of Good Shooting Practice. Furthermore, if such a caveat could be written into Part 1 of Schedule 9 of the Wildlife and Countryside Act 1981 i.e. those releasing less than 1,000 birds are exempt from the legislation; then why is it not possible to state that those releasing less than 1,000 birds per hectare of release pen (for pheasant) or release area (for red-legged partridge) are exempt? This would negate the need for a licence unless shoot operators wished to release more than the guidelines or wanted to release into European Designated sites and within 500m of their boundaries. It is the view of the [REDACTED] that avoiding a licence in this scenario would be most proportionate.

Question 9:

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

Yes.

The financial risk associated with annual licences might cause shoots to stop operating. In contradiction to legislation set up to protect the Welsh language and opportunities to practice it, annual licences could severely disrupt opportunities for the rural Welsh community to meet and practice the Welsh language. Often through the autumn and winter, shoot days are the key social interaction which many Welsh men and women rely upon. Furthermore, restrictions could deter foreign tourists traveling to Wales in the autumn and winter to shoot. This could also restrict opportunities for the Welsh language to be heard and shared.

Additionally, the migration out of Wales of employed gamekeepers and their families could severely impact small rural communities and primary schools as an example. Often these small communities offer a hub for the Welsh language and losing Welsh speaking children from these communities could be detrimental to the Welsh language in the future.

Question 10:

Is there a way we can increase the use of Welsh or provide more opportunities for people to use the Welsh language?

Yes.

NRW could encourage shoot providers to do and offer more opportunities within their communities. NRW and Welsh Government having an apparent basic assumption that gamebird release is negative does nothing to support the sector. Whereas if NRW were to support the sector it would encourage others to engage and by proxy offer additional opportunities for the Welsh language.

Additionally, it was also enthuse those working conservationists on the ground to do more if they felt their privately funded conservation efforts and species recovery efforts were supported rather than undermined.

Question 11:

Are there any aspects of the proposals that could disadvantage people in using the Welsh language?

Yes.

Shoot owners and operators may not deem annual licences a sound financial investment and they may end their shoot. In addition, shoots may not be viable if employees leave in search of secure employment.

If such shoots were to fold, many social opportunities to use the Welsh language could be lost in Wales and communities could suffer for it.

Question 12:

Do you believe the proposals treats the Welsh language less favourably than the English language?

No, apart from there is no legislative requirement to protect the English language in Wales. Whereas there is legislation protecting and encouraging the use of the Welsh language which could be undermined by the proposals.

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