Do you agree that common pheasant and red-legged partridge should be added to Part 1 of Schedule 9 of the Wildlife and Countryside Act 1981 in Wales?

This change would mean that releasing those species in Wales would need to be carried out under licence. Please give reasons for your views. - Adding to Schedule 9

The strongly believes that the common pheasant and red-legged partridge should not be included in Part 1 of Schedule 9 of the Wildlife and Countryside Act 1981 in Wales.

As mentioned, inclusion of these game birds into the relevant sections of the Wildlife and Countryside Act 1981 would result in their release to be carried out under licence, which in effect could severely impact the positive environmental, economical and social aspects that result from gamekeeping.

The management of habitat and predatory wildlife in order to protect game birds has a secondary role of paramount importance that greatly contributes to the survival of other vulnerable ground nesting birds, including the endangered Curlew.

Any unnecessary bureaucratic and potentially costly changes to the business and tradition of rearing and shooting game birds must take into account the unintentional effect such measures could have on the viability and thus the number of shoots in Wales. The consequential effect of losing gamekeepers on Wales' habitats and wildlife should be seriously considered.

In addition, the practice of gamebird shooting is an intrinsic piece of rural life and culture, providing seasonal nutritious food, and supporting rural employment and multiple avenues of revenue for local businesses.

If these species are added to Schedule 9, please give us your views on whether our proposed licensing approach would be effective and proportionate? - Views on proposed licensing approach

The believes that the proposed licensing approach is inappropriate and would do little above the current and well supported industry 'Code of Good Shooting Practice' guidelines. There is negligible evidence to imply that game bird release in Wales is damaging to specifically designated sites, and therefore makes it difficult to justify imposing a licensing scheme.

members also questioned the consequential cost imposed on NRW in processing and policing the uptake of licences. In addition, members were also wary of the potential for NRW to apply charges on obtaining specific licences in the future.

We have based the proposed general licence conditions for pheasant release on the recommendations in the GWCT guidelines for sustainable gamebird releasing. However, the guidelines do not include specific density thresholds for red-legged partridge and there appears to be less evidence on which to base conditions relating to partridge. We have used what evidence is available, and expert opinion, to propose conditions for partridge releases. These are either based on a density threshold linked to the area of cover crop provided, or on density per hectare of

release pen (as with pheasants), depending on how the birds are released. We would welcome views on whether these proposals are appropriate and workable and whether they could they be improved. - Views on conditions for partridge release

Given the sparsity of Wales-specific evidence on the environmental impact of releasing red-legged partridge, the would argue that introducing such measures under the licensing requirements is presumptive and further research should be carried out before introducing any regulatory change.

The GWCT guidelines include a recommendation that no more than one third of woodland with game interest should be used for release pens. This is to ensure sufficient woodland remains that can benefit from habitat management activities. We would like to include this recommendation in our proposed general licence. However, we would prefer to be able to define what can be included in the calculation. Do you have suggestions for how this might be achieved? - View on including a limit on woodland used for pens

No comment.

Location and density appear to be the main factors influencing the environmental impact of releases, but we recognise that smaller releases in less sensitive areas are likely to present reduced risks. It may be appropriate that small gamebird releases taking place away from sensitive protected sites and their buffer zones are not subject to the same general licence conditions that apply to larger releases. Do you think this is something we should consider? Please give reasons - Views on taking a lighter touch approach for small releases

The **scenario** is not supportive of the introduction of game bird release licences. However, in the scenario of licences being mandated, there should be leniency for smaller shoots to be exempt from such bureaucracy although all shoots should adhere to the Code of Good Shooting Practice.

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

- Welsh language considerations

The Amaeth Cymru Data and Evidence Group's 2016 report entitled 'Farming in Wales and

the Welsh Language' found that a far higher proportion of those in the ONS Agriculture,

Forestry and Fishing employment category spoke Welsh than in any other category. Further

analysis by the Welsh Government demonstrated that 43% of those in this category are able

to speak Welsh. Any proposals with the potential to destabilise rural economy and thus communities, has the ability to adversely affect the opportunity to use the Welsh language in these rural strongholds.

Is there a way we can increase the use of Welsh or provide more opportunities for people to use the Welsh language? - If yes, please explain in the box below

Are there any aspects of the proposals that could disadvantage people in using the Welsh language? - If yes, please explain the effects and how they could be mitigated

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