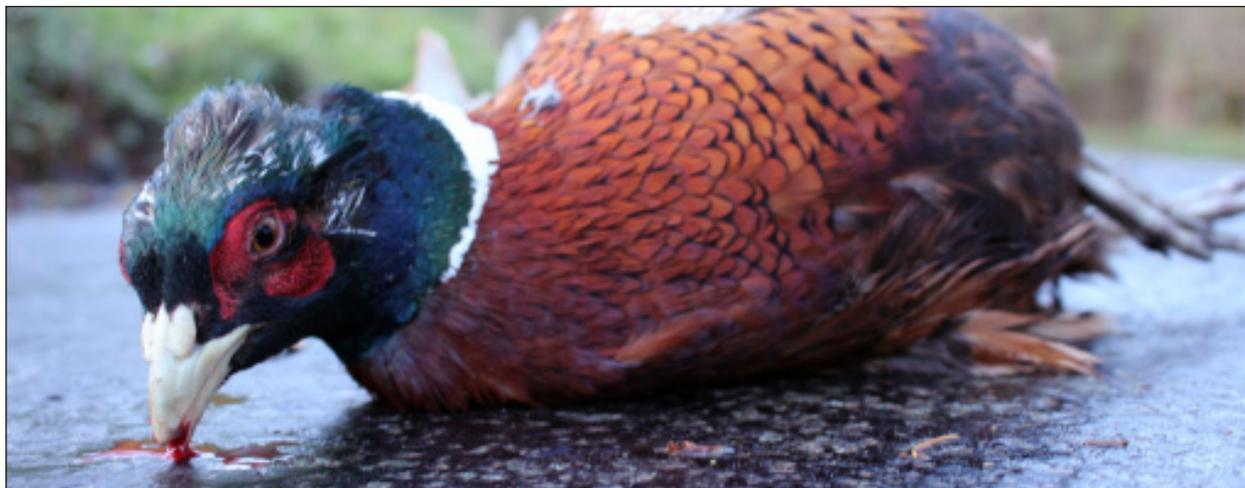


# SHOOTING ON NATURAL RESOURCES WALES' LAND

## Background, arguments against and recommendations



### **More shoots on Natural Resources Wales land**

Natural Resources Wales (NRW) was established in 2013. Some of its predecessor bodies (Countryside Council for Wales, Environment Agency Wales and the Forestry Commission Wales) had, in years past, entered into agreements with five shoots to operate on land they owned or managed. NRW, despite its key objective to act as a good steward to the countryside of Wales and its wildlife, has sought to lease out additional sites for shooting. The decision to expand these activities comes against the backdrop of increasing awareness of the role of pheasant shooting in the degradation of natural habitat and the decline in biodiversity, as well as concerns over public access, animal welfare and the lack of economic benefit for local communities.

### **IMPACT ON THE ENVIRONMENT**

#### **Shoots allowed in protected areas**

Shoots on NRW-managed land now include areas made up in whole or in part of ancient woodlands, some of which fall within or border spaces that enjoy protected status under the Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC) or Areas of Outstanding Natural Beauty (AONB) regimes.

#### **Thousands of birds released from a single site**

In the case of nearly all of these sites, shooting tenants annually release non-indigenous pheasants into the woodlands in numbers of up to 5,000 at a time.<sup>i</sup> Such densities are unnaturally high for any bird species, and they result in a strain on food and habitat availability. Research conducted by The James Hutton Institute suggests that the 'rear and release' approach of the kind deployed on NRW land can have many negative impacts on the natural environment. These include habitat changes that affect flora, hedgerow structure on the woodland fringe and soil composition. The impact is also felt with regard to competition for invertebrate 'resources', as well as through the introduction or maintenance of parasites in wild species.<sup>ii</sup>

Pheasants, furthermore, reduce the biomass of ground-

active invertebrates, causing a decline in carabids, including beetles,<sup>iii</sup> caterpillars<sup>iv</sup> and butterflies<sup>v</sup> – all of whom are important food resources for breeding birds.

The parasite loads carried by purpose-bred 'gamebirds' such as pheasants are very much higher than is found in their wild equivalents. The spread of disease by released birds not only increases mortality in wild birds, but may also reduce their reproductive potential and make them more vulnerable to disease.

#### **Land purged of native wildlife**

To ensure high stocks of pheasants on shoot days, NRW's shoot tenants eliminate foxes, stoats, weasels, corvids and rodents.<sup>vi</sup> Because, for birds of prey, rodents are an important food source, their numbers become threatened.

#### **Lead ammunition**

Toxic lead ammunition is also used at each of the sites. The impact is particularly stark with respect to birds of prey, especially when they consume shot 'gamebirds'.<sup>viii</sup> Studies have shown increased levels of sickness, death and reproductive failure in birds of prey and other predators.<sup>ix,x</sup>

The Oxford Symposium on lead poisoning estimated that between 2,500 and 6,700 tonnes of lead shot is fired at 'gamebirds' each year in the UK. It further stated that 'lead ammunition now appears to be the only significant, geographically widespread and common source of unregulated environmental lead contamination to which wildlife is exposed.'<sup>xi</sup>

It is because of the loss of biodiversity as set out above that the production of birds for sport shooting has been made illegal in the Netherlands.<sup>xii</sup>

### **ANIMAL PROTECTION**

#### **Shot, crushed, strangled, immobilised...**

Shoot tenants employ a variety of vicious predator control devices. Traps and snares, designed to crush, immobilise and strangle, are used on foxes, stoats, weasels and other



animals who present a perceived threat.

Many of these targeted animals will sustain painful and stressful injuries, which they might be forced to endure for up to 24 hours before, as demanded by the law, they are despatched. Animals' distress, however, can continue for much longer, where a trap-setter fails to check the device within the required time limit.

Corvids are invariably shot or cage-trapped. In the case of the latter, the standard method of despatch is a blow to the back of the head of the trapped bird.

### **Pheasants factory-farmed for release**

The standard 'rear and release' model employed by pheasant shoots involves birds being intensively bred at external sites before being transported to release pens located where shooting takes place. Industry figures indicate that a substantial proportion of the released birds will die of disease, of predation or under the wheels of a vehicle.

### **Birds' slow and painful deaths**

When the shoots themselves are taking place, around 40 per cent of pheasants are shot down but not retrieved. An uncounted number will remain injured, without veterinary attention to alleviate their suffering, until death overcomes them.

### **NRW's SHORTCOMINGS**

Animal Aid first became involved in this issue in October 2015, after a well-placed source told us that NRW wanted to rent out some of its land in Myherin for the 'sport shooting' of pheasants. To any objective observer, NRW's shooting initiative is at odds with its core mission to act as a good steward to the countryside and wildlife of Wales. As our research progressed we discovered that at least five other parcels of land managed by NRW are rented out for shooting. While NRW did not initiate these shoot agreements – one or more predecessor bodies was responsible – NRW could have wound down the operations. Instead it expanded them.

Among the multiple problems that become evident from studying the way NRW conducts the shooting operations on the land it manages, is a failure to understand that this matter is one of acute public concern. It should be obvious that many people would be alarmed to learn that the leading environmental agency in Wales is inviting commercial shoot operators to use their land for the large-scale killing for pleasure of purpose-bred birds.

The agency's blind spot in this regard is best exemplified by a statement made in a 30 March 2016 letter from Trefor Owen, Executive Director for National Services, to a local resident, David Grimsell, stating that 'NRW activity has not attracted significant stakeholder interest in the past; it is for this reason that the new leases were not identified as being of 'High Public Interest'. Does it really have to be explained to NRW that the lack of comment results from the behind-closed doors manner in which it has conducted its expansionary shooting activities?

Also troubling is the way that NRW recites its core goal to 'make the most of the public land that we manage for people, economy and environment in Wales'<sup>xvii</sup> without, it seems, seriously examining whether it has actually matched the rhetoric.

As we made clear above, on all three counts there is evidence that NRW has fallen short.

1) The negative impact on the environment is detailed in the paragraphs above.

2) It can also be reasonably argued that Natural Resources Wales runs its pheasant shooting enterprise in a manner that does not provide the local economy and communities with any meaningful benefit.

NRW has clearly spent a considerable amount of time and money tendering its new shooting arrangement to prospective clients. In return, it receives a mere £5,965<sup>xviii</sup> (not £30,000 as stated in NRW's Briefing to the Minister) for the renting out of all shooting rights – a total that is likely to be comprehensively eclipsed by the cost of administering the deeds, by economic loss to the local communities through the impact on recreation and tourism, and by damage to NRW's reputation as a custodian of public land.

3) Pheasant shooting often results in conflicts with various users of public land, including walkers, bird watchers and other visitors. Problems arise because access during shooting is restricted and because many members of the public will be caused alarm and distress by the firearms.

A number of these problems were highlighted in internal consultation documents – an exercise undertaken prior to new shoots being tendered. In those reports, senior NRW staff warned against going ahead with the new leases. They outlined the problems they foresaw, that seemed to be without an obvious solution.<sup>xviii</sup>

As an example, Nick Young, NRW Conservation Manager, wrote: '*My considered opinion is that Myherin is **not suitable** for a leased shoot as things stand, and that any intention to take this proposal forward should **require wider NRW and partner body consultation and an Ecosystem Appraisal of the likely effects of these shooting lease proposals.***'<sup>xviii</sup>

In terms of the income that could be expected to be generated against that which could be lost, Peter van-Velzen, Programme Manager, said: '*In my view the financial-, employment- and environmental impacts to harvesting by letting shooting rights here, will far outweigh the monetary income generated by a let. I note that no financial comparison has been carried out as part of this exercise.*'<sup>xviii</sup>

Nick Young also challenged a claim that the land earmarked for shooting was in 'inconsistent use' by the public. He pointed to Nantsyddion Bothy, which 'is *currently leased/loaned to the Mountain Bothies Association and is well used by walkers and well maintained at no cost to NRW. It forms part of a chain of bothies through Wales and often used in conjunction with Nant Rhys in Tarenig. Both Nant Rhys and Nantsyddion are well used. Does NRW really want the negative publicity of evicting MBA in favour of creating a shooting lodge.*'<sup>xix</sup>

### **ANIMAL AID'S INVESTIGATION**

In order to gain an insight into how shoots on NRW land are currently operating, Animal Aid investigators visited four sites over a weekend in late November 2015. In two of them, we found evidence of box and cage traps.<sup>xx</sup>

More palpably distressing were the numerous pheasants we found drifting up and down country roads near Maesmawr

and Llanfair woods, vulnerable to being hit by vehicles. While it is often said that pheasants are ‘stupid’ for straying into traffic, the manner in which they are raised and released conspire to make such outcomes likely.

Our investigator found one particularly forlorn victim – a male pheasant with blood dripping from his beak, his life rapidly ebbing away. We can’t know precisely why he ended up being battered by a vehicle, but it is likely that, having been released into the wild during late Autumn from the controlled environment of the game farm, where food, shelter and protection from predators is laid on, he will suddenly have joined thousands of other birds released at the same time in seeking out a place to be safe.

Competition for territory in local woods and cover crops would have been fierce. The country roads, though presenting a hazard, are likely to have been inviting, particularly because the shoot operator at the site where our male victim perished had set up feeding units for released birds on the roadside itself. In addition, at least one of the fields of cover crops butted onto a road. The birds would likely have associated roads with feed.<sup>xxx</sup>

Since that investigation, we have been examining the contractual arrangements relating to the various shoot operators. These agreements set out obligations and rules of conduct that the shoot operators are expected to observe.

The evidence we collected during the investigation referred to above, pointed to eight contract breaches. These included the illicit release of birds; laying traps for animals; and the introduction of feeders onto land where it was not permitted to do so.<sup>xxxii</sup>

That we were able to detect so many apparent breaches in one short visit strongly suggests that there are a lot more to be discovered.

## THE REVIEW

Given this background, we sent our dossier to the then Minister for Natural Resources, Carl Sargeant, asking him to intervene to ensure that current contracts were not renewed when they expired in March 2016.

The Minister said in a statement that he was going to keep the matter ‘under review’. We subsequently learned there was to be a review of shooting on NRW land but, in the interim, there was to be a one-year extension to the sporting leases of one of the shoot operators.

Our concern now – a reasonable one because of what has gone before – is that the promised review will be conducted behind closed doors, and without consultation with stakeholders and interested members of the public.



The terms of reference are another important matter. In correspondence with NRW, Animal Aid and the group Stop Shooting on Welsh Public Land learned that NRW intends for its own staff to conduct the review – although they were from another department unconnected with the shoot operations. This does not give us confidence in the objectivity of the process.

Information obtained from Freedom of Information requests indicate that notes or minutes relating to the awarding of shooting leases by NRW are not available. A further FOI has revealed that NRW is unable to provide any evidence that it has taken relevant scientific evidence into consideration, relating to conservation or biodiversity impacts, prior to awarding the leases. Because of this, we would suggest that NRW is not in command of the material paperwork and other records that identify the shoots on NRW land, the contracts entered into, the cost to NRW of staff time in creating or reissuing leases, and the kind of monitoring of the shoots (or lack of) that has taken place over the years.

Clearly, the decision to create new shoots (rather than use the land concerned for other purposes), tender them to shooting businesses and decide upon the successful bidders must have been made by several people and departments at NRW – but there has been no information about how these processes are conducted or concluded.

Furthermore, the scoping document of the NRW Policy Review refers to the BASC Code of Shooting Practice as defining the industry standard for the conduct and procedures to which shoots should adhere. However, the British Association for Shooting and Conservation is, in reality, the UK’s main pro-shooting lobby group and cannot be considered to be impartial in its advice. In fact, in 2014, the BASC Policy Development spokesperson stated: ‘Natural Resources Wales is planning its strategic work over the next three years and BASC has recommended that the new public body helps to increase shooting opportunities on its estate, particularly in woodlands ...’<sup>xxxiii</sup>

## THE WAY FORWARD

It is vital to take into account that the NRW estate is public land, which the agency is managing on behalf of the people of Wales. Equally important is the need for NRW to acknowledge that there are numerous ways in which the precious resources under its stewardship can provide for local communities and local economies.

### The Review must, therefore:

- **Be open and transparent**
- **Consult stakeholders and the public**
- **Seek independent scientific advice on the effects of shooting on the environment and animal welfare**
- **Conduct properly researched impact assessments for all possible outcomes**

*Animal Aid anticipates that a properly conducted, scientifically rigorous, open review will conclude that shooting is damaging to the environment, negatively impacts on animal welfare, and reduces public use and enjoyment of publicly owned land in Wales.*



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