

NRW's consultation on regulating the release of gamebirds (common pheasant and red-legged partridge) in Wales.

Consultation deadline: 20th June

Consultation link: <https://ymgynggori.cyfoethnaturiol.cymru/evidence-policy-and-permitting-tystiolaeth-polisi-a-thrwyddedu/nrw-s-proposed-approach-to-regulating-the-release/>

CNP's Consultation Response:

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.

Yes, we strongly support this addition as an appropriate and necessary step to better regulate the current volume of gamebird releases identified in the consultation.

Relying on self-regulation from the industry has clearly failed to provide a reliable picture of how the precise quantity of gamebirds released in Wales is currently impacting on the environment.

In our view this lack of knowledge, combined with growing evidence as to the effect that large releases of gamebirds and their combined management practices, are having on local biodiversity necessitates the introduction of licensing conditions.

We are particularly concerned by the potential impact of gamebird releases on areas of North East Wales which are currently within NRW's area of search for the designation of a new National Park. The area is simultaneously identified in evidence report 680 as having the second highest concentration of shoots in Wales and a high proportion of game bird holdings in nearby areas.

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?

The proposals for licensing are to be broadly welcomed, however, limiting 'specific licences' to protected SSSI sites will fail to deliver the scale of change required.

Although we recognise the consultation's justification for limiting the use of 'specific licences' to protected sites, "due to a lack of an effective mechanism for monitoring or managing the effects of gamebird releases outside the boundaries of protected sites", we believe that a wider application of 'specific licences' – or alternatively strengthened general licence terms and conditions – will be necessary in order to provide National Parks and AONBs a better chance of delivering on their purpose of conserving and enhancing the natural beauty and wildlife of an area; and of contributing to Welsh Government's 30 x 30 biodiversity target.

In light of the 3rd recommendation in Welsh Government's Biodiversity Deep Dive, it is clear that designated landscapes (National Parks and AONBs) have an important part to play in delivering more for nature. If there is to be a stronger emphasis on nature recovery in these landscapes, then consideration should be given as to how these regulatory changes can help deliver that.

For example, if 'specific licences' cannot be applied to designated landscapes, special considerations should be made under the terms of the 'general licence' in order to help protect the special characteristics of these landscapes. Elements from the 'specific licence' such as density limits of 700 birds per hectare could be considered for use in designated landscapes in line with those proposed for ancient woodland and other more sensitive areas. This will aid the nature recovery and habitat renewal needed in large parts of our National Parks.

Additionally, without the necessary checks or enforcement, the 'general licence' conditions are likely to be open for non-compliance and we are concerned by the lack of an evident reporting framework for numbers of birds released throughout the annual term of the licence.

Mandatory reporting of quantity and location should be a requirement for all licences to aid in filling the knowledge gap and informing future regulations. Further thought needs to be given to how license terms and conditions will be enforced (for example through spot checks).

All new licensing arrangements should be accompanied by the use of [vicarious liability](#) to uphold accountability for those who manage the land in which game birds are released and shooting is unlawfully taking place outside of season.

We also believe that buffer zones for protected sites under the specific licence should be extended from 500m to at least 1000m. This is in recognition of the consultation's conclusions that (although only in small proportions) female birds can travel beyond 1000m of their release site.

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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

The definition of small here is important and we refer to our earlier point suggesting that designated landscapes are afforded additional protections as part of this regulation.

Although designated landscapes are not protected sites in the same way as SSSIs, their statutory purpose to conserve and enhance wildlife and natural beauty should be taken into account as part of these regulations.

General CNP position statement on the regulation and control of gamebird releases in the wild.

Natural Resources Wales (NRW) have proposed a new licensing approach for the release of pheasant and red-legged partridge across Wales. There are different licensing regulations in England, but this latest consultation in Wales provides an opportunity for CNP to revisit our general principles for the release of gamebirds across National Parks in England and Wales.

The proposed NRW changes will add pheasant and red-legged partridge to part 1 of Schedule 9 of the Wildlife and Countryside Act 1981 (as in England). Part 1 of Schedule 9 lists non-native species that are already established in the wild, but which may pose a conservation threat to native biodiversity and habitats. This would mean that any release of those species in Wales would need to be carried out under a licence issued by NRW.

NRW are proposing the introduction of a 'specific licence' within protected sites such as SSSI. Our position is that this higher level of protection should also be applied to National Parks to fulfil their first purpose and support delivery of species and habitat objectives set out in management plans.

An annual 'general licence' will be available for anyone to use if they comply with terms and conditions for areas outside of these protected sites. We believe that such a general licence should only apply outside of National Parks. The general licence would use the [Game and Wildlife Conservation Trust's Guidelines for Sustainable Gamebird Releasing](#)

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The NRW consultation highlights how little is known about the exact numbers of birds released and their potential impact at scale. This proposed regulation - specifically for common pheasant and red-legged partridge - goes a step further than the [licence conditions in England](#)¹ with the introduction of a specific and a general licence, whereas in England only a general licence has been applied to protected sites with no need for a licence outside of protected sites.

However, in both cases a lack of mandatory reporting on location and numbers released will restrict the effectiveness of these measures, and we believe that designated landscapes need to be considered much more when specifying the sites in which these licences apply in order to better protect their special characteristics and enhance conservation efforts.

Better reporting and enforcement of these licence conditions will improve our understanding of trends and associated impacts of gamebird releases, therefore informing future regulation on a sound evidence base.

Our National Parks are vital areas of wildlife conservation and need every helping hand to ensure that they maintain a rich and diverse range of habitats and species. We therefore welcome all attempts across England and Wales to better monitor and regulate the number of gamebirds released into the wild, but understanding and reducing the impact of gamebird releases on biodiversity can only be achieved through enforced reporting and included in relevant designated landscape management plans.

Reference documents:

- [Consultation Paper](#)
- [Annex 1: Our proposed approach to addressing statutory protected sites requirements](#)
- [Annex 2: Assessment of evidence relating to gamebird survival rates and patterns of dispersal](#)
- [Annex 3: Rapid review of the potential impacts of released common pheasant and red-legged partridge on species and habitats listed under section 7 of the Environment \(Wales\) Act 2016](#)
- [Evidence Report 680: Patterns of Gamebird Release, Management and Shooting in Wales \(Madden 2023a\)](#)
- [Evidence Report 681: A Review of The Ecological Effects of Gamebird Release and Management in Wales \(Madden 2023b\)](#)

¹ Current license arrangements in England: <https://www.gov.uk/government/publications/gamebirds-licence-to-release-common-pheasants-or-red-legged-partridges-on-european-sites-and-within-500m-of-their-boundary-gl43/gl43-licence-to-release-common-pheasants-or-red-legged-partridges-on-european-sites-and-within-500m-of-their-boundary>

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Summary of CNP's gamebirds position:

- Higher levels of protection for protected sites should also be applied to National Parks to fulfil their first purpose and support delivery of species and habitat objectives set out in management plans.
- We also believe that buffer zones for protected sites under the specific licence should be extended from 500m to at least 1000m.
- All licenses for gamebird releases should include mandatory reporting on location and number of birds released along with stricter enforcement of terms and conditions, through spot checks for example.
- Self-regulation has proved to be an unsatisfactory way of monitoring the release of birds.
- National Park Management plans should include an understanding of the number and spread of gamebirds released in the National Park.
- All new licensing arrangements should be accompanied by the use of [vicarious liability](#) to uphold accountability for those who manage the land in which game birds are released.
