



## **Paper 1**

# **Consultation on proposals about the use of firearms on land managed by Natural Resources Wales**

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## Foreword

We are carrying out a formal review of our policy on the use of firearms and shooting activity on the land that we manage, hereafter referred to as ‘the review’.

The review is being undertaken due to the introduction of new legislation in Wales and following concerns from stakeholders about animal welfare of pheasants on our land. We want to make sure that if firearms are used on the land we manage it is for the right reasons, in the right circumstances and in the best way possible.

We are committed to working with our stakeholders to deliver the best outcomes for Wales, and this consultation process is an important element of our overall approach. We know that there are differing opinions about the use of firearms but it is our role to take an evidence based, balanced view of the issues in accordance with our role and remit and the legislative and policy requirements that we must comply with.

## Reason for this consultation

The aim of this consultation is to understand what you think about our draft proposals and whether there are other issues you think we should be taking into account. We will use this to inform the development of a position statement on the use of firearms on land that we manage.

## How to take part in this consultation

Tell us what you think by completing the [on-line response survey](#).

If you are unable to use the on-line response survey, or wish to obtain this document or the response survey in an alternative format, please email:

[Shooting.review@naturalresourceswales.gov.uk](mailto:Shooting.review@naturalresourceswales.gov.uk) or telephone 0300 0653000.

The consultation ends on Wednesday 25th April 2018.

# 1. Introduction

## 1.1 Our role and remit relevant to the review

We have several roles and remits where firearms are used in accordance with a variety of existing legislation, protocols, standards and guidance. The review and this consultation are solely concerned with firearms and shooting activity related to our land manager role and remit.

We manage the 128,000 hectare Welsh Government Woodland Estate (WGWE) on behalf of the Welsh Ministers, 54 National Nature Reserves (NNRs) and land associated with flood risk management assets. As a land manager, we use firearms to limit the damage from wild species to protect delivery of our land management objectives. This includes the conservation of protected and priority species and habitats and maintaining the productive capacity of the woodlands we manage. We also consider proposals from other people for activities involving firearms on the land that we manage.

## 1.2 Stages of the review

The review is being undertaken in several stages.

- **Stage 1:** [Call for Evidence](#) (closed 30 April 2017).
- **Stage 2:** [Synthesis of Evidence](#) (September 2017).
- **Stage 3:** [Independent assurance](#) of our Synthesis of Evidence (November 2017).
- **Stage 4:** Consultation on proposals (launched January 2018).
- **Stage 5:** Analysis of consultation responses (April 2018).
- **Stage 6:** Publication of a position statement (Spring 2018).

## 1.3 Our current use of firearms

Firearms are used for three broad purposes on the land that we manage:

- Our use of firearms for managing wild species which impact on our objectives;
- Other people's use of firearms for managing wild species that impact on our neighbour's land management objectives; and,
- Our leasing of land for game shooting and other pursuits using firearms.

The proposals in this consultation document are linked to these three broad purposes.

## 1.4 Using evidence to inform this consultation

In February 2017, we made a public [Call for Evidence](#) (stage 1) to inform our review. We sought evidence from interested parties on the use of firearms to help us test whether shooting delivers our purpose in line with the principles of Sustainable Management of Natural Resources (SMNR)<sup>1</sup> and contributes to the Well-being of Future Generations (Wales) Act (2015) goals (the Well-Being Goals)<sup>2</sup>. This was open for twelve weeks and 36 submissions were received. These varied from short statements of opinion to papers referencing peer reviewed journal papers.

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<sup>1</sup> The Environment (Wales) Act (2016). More information can be found in [our booklet](#) introducing the Sustainable Management of Natural Resources and from the [Welsh Government website](#)

<sup>2</sup> Well-being of Future Generations (Wales) Act (2015). You can find out about our work towards meeting the well-being goals on [our website](#) and more information can be found on the [Welsh Government website](#).

Over 220 pieces of qualifying evidence were received. Together with evidence sourced by us and from our own records, over 250 pieces of evidence were considered. Review project staff and a panel of experts from across the organisation assessed the submissions against the principles of [SMNR and the Well-Being Goals](#) as well as considering the confidence that could be allocated to individual pieces of evidence.

Having reviewed all the evidence, we produced a [Synthesis of Evidence](#) report (stage 2, paper 2) which we are publishing alongside this consultation.

Our review process and Synthesis of Evidence report have undergone independent external assurance (stage 3, paper 4), to enable us to robustly demonstrate that our review has objectively evaluated the evidence that was submitted. Commenting on our Synthesis of Evidence and the conclusions that we reached, Professor Garry Marvin from the University of Roehampton and Dr Sam Hillyard from the University of Durham said that:

*‘Overall, we have confidence, from the documentary evidence, that the review has been fair, transparent, and represents reasoned account/evaluation of the submissions. We are also satisfied that NRW’s scoring/ranking of the submissions, from the most subjective/personal to rigorous academic analysis has been fair. We would have evaluated the submissions in a similar manner. We are in agreement with the levels of confidence that NRW has attached to the submissions. We were not able to detect any perceived bias in the presentation of the submissions within the report.’*

Most of the evidence discussed in the Synthesis of Evidence report covers shooting activities in a wide range of situations and is not specific to land in public ownership and our circumstances. Therefore we have produced a paper, Applying the Evidence to the NRW Estate, published alongside this consultation document ([paper 3](#)). Paper 3 considers the broader evidence in relation to the land that we manage, to give context to the assessment of the use of firearms as it may relate to furthering our legal purpose and the achievement of SMNR and the Well-Being Goals. The paper also contains the review recommendations based on the evidence submitted, and these recommendations are the basis of the draft proposals contained within this consultation document (stage 4, paper 1).

### **1.5 Scope of consultation proposals**

The consultation proposals are divided into three - one for each of the main purposes where firearms are currently used, as detailed in section 1.3.

For each purpose, we will:

- Explain what we currently do and why we do it;
- Summarise the evidence that has been submitted and reviewed, in relation to current and alternative options, and the conclusions that have been reached;
- Detail the recommendations of the review based on the evidence reviewed; and
- Outline a draft proposal and consider this in relation to the principles of SMNR and the achievement of the Well-Being Goals.

## 2. Our use of firearms for managing wild species which impact on our objectives

### 2.1 Current approach

We currently use firearms on land that we manage to control wild species, principally deer but sometimes other species such as mink. There are several reasons why we need to control these wild species including to:

- Protect growing trees from browsing;
- Conserve protected habitats; and to,
- Control Invasive Non-Native Species (INNS).

The aim is to reduce negative impacts to a level where the benefits from our natural resources can be maintained (SMNR). These benefits may be nature recovery, production of timber, sequestration of carbon or other goods and services.

Firearms are an effective form of control for large mammals as it is a species specific approach and the risk of impact on non-target species is low. Individuals within a species can be selected according to best practice.

Firearms are used by our highly trained staff applying best practice standards to ensure animal welfare. Our internal procedures promote the use of other management techniques as well as firearms to minimise the impacts of wild species, including measures in strategic, long term forest design and site management. The principals of ethical wildlife control<sup>3</sup> provide a framework for identifying the need for control and management, ensuring that alternatives to lethal control and combinations of actions are considered for a successful reduction of impacts on achieving site objectives.

### 2.2 Summary of evidence

Based on the evidence we have reviewed there are a number of potential alternatives to our current approach.

#### 2.2.1 Alternative approach: fertility control

Contraception of wild mammals at an individual level is possible but success at a population level, particularly if the only method of population control, is unlikely. This is due to the effectiveness and costs of delivery of the contraception and population dynamics. Delivery of contraception during trials has been by hand injection or close darting (involving firearms). Delivery from greater distance is unreliable and oral bait is not species-specific therefore unlikely to be an option for effective control at a population level.

#### 2.2.2 Alternative approach: forest design / exclosures

Exclosure options (using fencing) can lead to grazing pressures being redirected to other areas rather than reducing the overall pressure. Changing forest design management options is not likely to be appropriate to protect priority species and may not meet the

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<sup>3</sup> Dubois et al (2017), International consensus principles for ethical wildlife control. Conservation Biology. doi:10.1 can be accessed online at <http://onlinelibrary.wiley.com/doi/10.1111/cobi.12896/full>

management objectives for species protection, productive capacity or maintenance of native habitats.

### **2.2.3 Alternative approach: do nothing, no control**

The browsing, grazing and bark damage caused by deer and other herbivores negatively impacts on the economic viability of Wales' forestry and agricultural sectors, and the resilience of many important ecosystems. Without management, the potential economic benefit to Wales is reduced through lost agricultural output, increased tree stocking costs and reduced timber quality and value.

The impacts of high deer populations in woodlands include reductions in woodland flora diversity, loss of shrub layers resulting in reduced structural diversity and prevention of recruitment of tree regeneration to canopy layers. The resulting loss in habitat opportunities for insects and birds can further reduce woodland biodiversity value.

Studies of rewilding projects such as those in the Netherlands have found that woody plants were limited by the presence of unmanaged herbivores and woodland was converted to grassland. The high numbers of herbivores meant that food supply became a limiting factor for all herbivore populations in the absence of any active population control measures. In some years, the food supply limitations gave rise to high winter mortality rates and raised animal welfare concerns. Lack of management of the negative impacts on priority species will result in population reductions risking possible local or national extinction.

## **2.3 Conclusion**

Alternatives to our current approach to managing the impacts of wild species do not provide the same level of confidence that our land management objectives will be achieved.

## **2.4 Recommendations**

Having considered the evidence, we are making the following recommendations:

- We should continue to manage the negative impacts of wild species on the land we manage as it is essential to achieve the sustainable management of natural resources.
- In determining whether lethal control is the most appropriate method of management, planning should demonstrate the need for control, consider other options to avoid or reduce the impacts and consider the local social acceptability of the action.
- If lethal control is necessary, it should be part of a long-term management plan which has clear and achievable outcomes and considers animal welfare issues.
- We should maintain the ability to carry out control with firearms through well trained, qualified personnel.

## 2.5 Proposal

**The use of firearms should continue to be an option available to NRW in managing the negative impacts of wild species on the land it manages to achieve the sustainable management of natural resources.**

The contribution that this proposal would make to SMNR and the achievement of the Well-Being Goals has been assessed as follows:

- The level of management of wild species is based upon evidenced impacts on our objectives and is adapted following monitoring and review. Effective management of wild species requires action at a landscape level scale appropriate to the population and ecology of the species and habitats being managed, often involving collaboration between land managers and others.
- The management of impacts from wild species addresses the Resilient Wales goal in maintaining biodiversity and functioning ecosystems to support resilience. Additionally, it contributes to the Prosperous Wales goal where the benefits of healthy ecosystems deliver economic benefits such as timber and employment. The provision of venison meat, which is a low-fat option, contributes to the Healthy Wales goal.

## 3. Other people's use of firearms for managing wild species that impact on our neighbour's land management objectives

### 3.1 Current approach

Some wild species that occur on the land we manage may cause damage to livestock, crops or the conservation sites of neighbouring landowners.

We currently issue permissions for neighbouring landowners, or groups representing their interests, to enter NRW land to carry out management to prevent or reduce serious damage which the wild species would otherwise cause. This is primarily the control of foxes to prevent damage to livestock by flushing out the animal and dispatching with a firearm.

We only consider issuing such permissions on the land we manage where a neighbouring landowner is at risk of or is suffering losses arising from predation by wild species. Before issuing a permission, the applicant must provide sufficient evidence from the neighbouring landowner that there is such a risk.

### 3.2 Summary of evidence

Based on the evidence we have reviewed, there are a number of alternatives to our current approach.

#### 3.2.1 Alternative approach: do nothing, no control

Studies in the UK suggest that the percentage of lambs lost to predation by foxes is low at less than 2% of mortality. However, confidence in the available studies is limited by the difficulty of finding a situation where fox management is not undertaken to act as a control

site. This is due to fox control being widely carried out. There are areas recognised as suffering higher levels of fox predation and localised examples of high levels of predation impacting on farming income and therefore the rural economy, particularly in upland areas of Wales.

At appropriate sites, predator (fox) control can have important conservation benefits, both for species in the woodland itself, such as woodcock and snipe, as well as those in adjacent habitats. Ground-nesting birds can be particularly vulnerable to predation, and many are in decline in Wales as well as across the UK. Where forestry is adjacent to mountain, moor and heathland, ground-nesting birds such as curlew and golden plover may benefit from reduced predation pressure. On grassland that adjoins woodland, breeding lapwing or snipe may benefit from fox control undertaken in the neighbouring forestry block.

### **3.2.2 Alternative approach: snaring or trapping followed by dispatch**

The Welsh Government Code of best practice on the use of snares in fox control identifies that snares are a means of restraining animals not killing them and that the recognised method of humanely dispatching foxes is shooting with an appropriate firearm. As such snares and traps still require the use of a firearm to dispatch the animals caught and in these circumstances, do not offer an alternative to the use of firearms. The code also says that snares should only be used when other control methods are not available.

### **3.2.3 Alternative approach: immuno-contraception**

Immuno-contraception has two main delivery mechanisms, via use of a dart which has the risk of not injecting properly, or by cage trapping and injection which is expensive and may not be effective. The use of immuno-contraception is unlikely to be successful in reducing a population, rather it can be used to maintain a population level after other methods have been used to reduce it. Programmes over a long timescale have been shown to reduce the population but in the short to medium term impacts continue. While immuno-contraception in foxes may be feasible<sup>4</sup> it would require levels of sterility of between 65% and 80% which is unlikely to be achievable.

## **3.3 Conclusion**

Alternatives to our current approach are less likely to achieve the desired outcomes. Control of animals using firearms avoids the risk of impacting non-target animals; other legal methods can inadvertently affect other species. Immuno-contraception of large mammals is difficult and not likely to be effective without long term commitment and resource. Other alternatives such as poisoning are not legal.

## **3.4 Recommendations**

Having considered the evidence we are making the following recommendations:

- We should continue to consider applications for permission to carry out control of wild animals using firearms.

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<sup>4</sup> Saunders et al (2002). The effects of induced sterility on the territorial behaviour and survival of foxes. Journal of Applied Ecology 39:56-66

- Applications for permissions to carry out control on the land we manage must include justification that the activity is for the purpose of preventing or reducing serious damage which the wild animal would otherwise cause.

### 3.5 Draft proposal

**NRW should continue to consider applications for permission to carry out control of wild species using firearms on the land we manage.**

The contribution that the draft proposal would make to SMNR and the achievement of the Well-Being Goals has been assessed as follows:

- The evidence provided to this review links the control of wild species impacting on land managers' objectives to the Prosperous Wales goal, in terms of the long-term viability of farming and the resilience of the economy and rural communities. By supporting the production of Welsh lamb, we also reduce our imports of meat, which supports the economy and reduces Wales' carbon footprint.
- The protection of priority species of breeding birds improves the resilience of those populations and therefore contributes to the Resilient Wales goal. In relation to SMNR, applications assess the scale and risks associated with the proposed activity for the purposes of preventing or reducing serious damage that the wild species would otherwise cause. The activity can therefore be considered preventative action under the SMNR principles.

## 4. Our leasing of land for game shooting and other pursuits using firearms

### 4.1 Current approach

We want communities and social enterprises to get the greatest possible benefit from the land that we manage. We consider applications for a variety of events, activities, projects and enterprise initiatives to make it possible for the people of Wales to make the most of the land that we manage. This currently includes the shooting of gamebirds on a very limited basis.

Currently we lease four areas of forest land on the WGWE, covering 440 hectares, to third parties for the purpose of pheasant shooting. The leases are usually for between three to five years, but are currently on a rolling, annual renewal basis pending the outcome of this review. In 2016, we earned approximately £6,000 of income from these leases.

All shooting activity must be managed to best practice standards with an agreed management plan including public safety measures. This includes compliance with the [UK Woodland Assurance Standard \(2013\)](#). None of the leases inhibit public access or our own interests in managing the land, for example timber production. We allow lease-holders to keep pheasants in pens at agreed locations within their lease areas prior to release. Records show that in 2016, approximately 6500 pheasants were released which is a density of less than 15 birds per hectare. This is a very small proportion of the number of

birds reported as released across the UK indicating that leases for shooting activity on land that we manage is minor. Management of birds in pens must follow the *WG Code of Practice for the Rearing of Gamebirds for Sporting Purposes* (2010). It should be noted that the breeding of gamebirds does not take place on our land and as such is outside of our direct influence. We have no power to inspect the breeding or rearing of gamebirds that takes place elsewhere.

There are areas of land, for example foreshores, managed by us where there is an expectation or condition associated with the original grant of the lease that the shooting rights would continue to be let. A wildfowling management plan must be completed before any shooting is let. Eight sites are let with a total area of 4,881 hectares. The rights are exercised on all eight sites however shooting is not permitted on approximately 1,120 hectares of this area due to nature conservation interests.

There are significant areas of the land we manage where NRW does not have control of the shooting rights. We cannot restrict the holders of these rights from exercising them. Therefore, these areas are outside the scope of this review.

There is an economic benefit to Wales through shooting activities. However, the published reports include all shooting activities and it is not possible to relate this evidence directly to leases on the land that we manage. Records relating to our leased areas give an indication of a positive contribution to the local economy. It is complex and expensive to assess the contribution of shooting activities to the cohesiveness and well-being of the communities likely to benefit or be affected by such activity. The conflicting views held by pro- and anti-hunting lobbies, and the lack of available research in some areas, do not allow us to draw objective conclusions on the contribution of hunting to building social capital or on social interaction contributing to overall well-being.

Wildfowling requires that the number of birds taken is not at an unsustainable level. Annual reports of numbers and species taken help to monitor this aspect and management plans are recommended to contribute to the sustainability of populations. There are examples of voluntary restrictions to sustain species population.

We also have a small number of requests for other pursuits involving firearms such as target shooting, practice ranges and clay pigeon shooting. These are assessed on a case by case basis.

## 4.2 Summary of evidence

Based on the evidence we have reviewed, the following issues associated with our current approach and potential alternative approaches have been identified.

### 4.2.1 Alternative approach: revised NRW criteria for assessing applications

- The approach would involve developing criteria for assessing the suitability of proposals and lease renewals to ensure that they complement SMNR and that decisions support the achievement of the Well-Being Goals. In practice, this could mean that we re-appraise the areas of the WGWE that are leased, for example to avoid designated and other sensitive sites, and that we include conditions in lease agreements to ensure that

stock going into pens on our land is from suppliers that adhere to the WG Code of Practice.

- There are impacts on biodiversity from the release of pheasant, with benefits for some groups of species and disadvantages for others. The evidence does not suggest a clear conclusion on the impacts, however it is clear that active woodland management and adherence to the recommendations of less than 700 birds per hectare of pen are necessary to ensure there is no overall negative impact on biodiversity.
- Stocking densities in pens along with planned and regular habitat management actions are key in determining if the presence of pheasants in a woodland have a detrimental, benign or positive effect on the biodiversity of the woodland. Many of the actions used to benefit pheasants in a woodland such as thinning, encouragement of ground and shrub layers, edge management and ride management are those that good woodland management practice recommends (such as the [UK Forestry Standard](#)) for the biodiversity and resilience of any woodland.

#### **4.2.2 Alternative approach: stopping the use of our land for these activities by terminating leases where possible**

Based on the evidence relating to the current permitted shooting activity by others, it is reasonable to suggest that terminating or ceasing leases may:

- Result in a loss of income for the communities, individuals and businesses concerned (including service providers such as local hotels), reducing the overall economic (and social) benefit to Wales;
- Reduce options for recreation for some people, which may affect their health and well-being, although there are many shoots managed on privately owned land that could be considered as an alternative;
- Result in shoots taking place on more sensitive sites elsewhere; and may,
- Increase anti-social behaviour in woodlands where leases have been withdrawn. This is based on NRW managers' experience of levels of anti-social behaviour in woods with and without shooting leases.

### **4.3 Conclusions**

The activities related to game shooting, mainly pheasant shoots and wildfowling, have the potential to impact upon the sustainable management of natural resources. Impacts of increased bird numbers in woodlands can affect native species and habitats through competition, predation and enrichment. The management associated with pheasant releasing can have positive effects for biodiversity. Application of SMNR principles can balance impacts through adapting management to reduce negative impacts and encourage positive effects, taking preventative measures to reduce risk of disease and using evidence to inform decisions. Wildfowling necessitates managing adaptively, for example monitoring species numbers and adjusting the number of birds taken in response to this evidence or ceasing to take certain species.

The overall balance of benefits versus negative impacts is not conclusive. Impacts on sensitive or higher value habitats is greater than upon sites with lower value biodiversity.

The alternative approach of revising NRW criteria for assessing the potential impacts upon SMNR and the Well-Being Goals would facilitate opportunities to deliver activities that on balance provide benefits under SMNR and Well-Being Goals. This may include non-lethal shooting activity such as target shooting, practice ranges and clay pigeon shooting

Terminating leases without assessing the impacts of the activity upon SMNR and the Well-Being Goals could result in loss of some SMNR and other benefits currently delivered.

#### 4.4 Recommendations

Having considered the evidence, we are making the following recommendations:

- We should continue to consider the leasing of land for pheasant shooting and wildfowling. In considering applications and renewals, the impacts of the activity on SMNR and the Well-Being Goals should be assessed. The location and scale of activity should take account of the potential for negative impacts on the woodland ecosystem and local species of flora and fauna but also the beneficial social aspects of local community cohesion and potential economic benefits. Management plans should be developed and implemented.
- Leaseholders should be able to demonstrate that they source stock from establishments that follow the Welsh Government (or relevant government if sourced outside Wales) Code of Practice for the Welfare of Gamebirds Reared for Sporting Purposes (2010 No.55).
- The management of birds in holding and release pens on land that we manage should follow the Welsh Government Code of Practice for the Welfare of Gamebirds Reared for Sporting Purposes (2010 No.55).
- Leaseholders should demonstrate how disease risk is minimised through adherence to the relevant Codes of Practice particularly for siting holding and release pens in the best location and adherence to the recommended stocking densities.

#### 4.5 Draft proposal

**NRW should continue to consider the leasing of land for pheasant shooting, wildfowling and other pursuits involving firearms. In considering applications, the impacts of the activity on SMNR and the Well-Being Goals should be assessed. The location and scale of activity should take account of the potential for negative impacts on the woodland ecosystem and local species of flora and fauna but also the beneficial social aspects of local community cohesion and potential economic benefits. Management plans should be developed and implemented and leaseholders required to demonstrate adherence to relevant codes of practice. NRW will continue to assess compliance of permitted activities with the UK Woodland Assurance Standard.**

The contribution that the draft proposal would make to SMNR and the achievement of the WBFG goals has been assessed as follows.

- Third party shooting is linked to several of the Well-Being Goals. It contributes to a Prosperous and Resilient Wales, by providing direct employment for service providers

and supporting associated businesses such as hotels. These benefits would be maintained by this proposal.

- The proposal will contribute to a Globally Responsible Wales, as it will ensure that the populations of migratory birds are considered when engaging in shooting activities involving wild birds. The agreed moratorium on shooting Greenland White-Fronted Geese demonstrates this responsibility.
- Various stakeholders have reported the importance of shooting to rural communities and shooting's role in the culture of Wales. There are reduced antisocial behaviour issues in sites leased for shooting based on NRW managers' experience of levels of anti-social behaviour in woods with and without shooting leases.
- There are potential positive health benefits for those taking part in the activities and the consumption of game, a low-fat meat, is also a positive.
- In relation to SMNR, the management plans of shoots should include monitoring, reporting and review requirements to enable changes in management action to help ensure populations are sustainable. Shoot managers should also have to demonstrate adherence to best practice, for example in relation to bird health and husbandry, by following recognised codes of practice.
- The scale of areas leased should also be carefully assessed and would be appropriate to the activity, location, habitat type and sensitivity. Furthermore, leases would continue to be let on a medium-term basis to allow for ongoing review of the benefits and impacts.

## 5 Responding to this consultation

Thank you for reading this consultation document. Please let us know what you think by completing the [on-line response survey](#)

If you unable to use the on-line response survey, or wish to obtain this document or the response survey in an alternative format, please:

email: [Shooting.review@naturalresourceswales.gov.uk](mailto:Shooting.review@naturalresourceswales.gov.uk)

or phone: 0300 065 0300.

## 6 How will we use your response?

We will publish a summary of the responses on our website and use your views to help develop our new position statement on the use of firearms on land that we manage.

If a response has been made on behalf of an organisation, we will publish the name of that organisation. We will not publish names of individuals who respond.

In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation, but we will not include any personal information. If you request your response to be kept confidential, we may still be required to provide a summary of it.

When completing the on-line response survey or submitting your response in writing, please ensure you indicate, when asked to do so, if you wish your response to remain confidential.