

A Review of the use of Shooting on land managed by Natural Resources Wales.

Call for Evidence

1. Introduction

Natural Resources Wales (NRW) is carrying out a formal review of its policy on the use of firearms on land we own and/or manage.

To help inform our review we are calling for evidence from interested parties on the use of firearms on NRW managed land. We are seeking evidence that helps us test if shooting activities help us to deliver our purpose in line with the principles of Sustainable Management of Natural Resources and if it contributes to the well-being goals of the Well-Being and Future Generations Act 2015.

Land where various retained rights apply, such as shooting rights, is outside the scope of this review because NRW cannot restrict the exercising of these rights.

2. Background

Natural Resources Wales has a number of roles and responsibilities where firearms are used in accordance with a variety of existing protocols, standards and guidance.

- As a land manager we need to limit damage from pests to protect delivery of our land management objectives including the conservation of protected and priority species and habitats and productive capacity.
- We also consider proposals from third parties for activities on the land that we manage.
- There are relevant circumstances involving the use of shooting where we are the provider of Statutory Nature Conservation Advice.
- We act as the regulator for relevant permit applications for land in other ownership.

With the introduction of new legislation we want to be sure that the use of firearms is undertaken for the right reasons, in the right circumstances and in the best way possible.

A number of interested parties have recently expressed concern over animal welfare issues connected to pheasant shooting on land that we manage. We are reviewing the use of firearms to include the consideration, viability and consequences of alternative approaches.

3. Evidence in context

As part of our remit we manage land some of which we own and some that we manage on behalf of Welsh Ministers. We do this to provide social, economic and environmental benefits to the people of Wales. We are asking you to submit evidence on the issue of the use of firearms in respect of our land management remit as it relates to the delivery of **our purpose** by applying the principles of **sustainable management of natural resources** to maximise our contribution to Wales' **well-being goals**.

Natural Resources Wales' **purpose** is to pursue sustainable management of natural resources¹. We will apply a specific set of sustainable management principles while maximising our contribution to the well-being goals. Our legal purpose is set out in the Environment (Wales) Act 2015. We are proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably. You can find out more about [what we do](#) by visiting our website.

We are required by the Environment (Wales) Act 2015 to apply the principles of the **Sustainable Management of Natural Resources** (SMNR) in everything that we do. You can find out more about [our approach to the sustainable management of Wales' natural resources](#) by visiting our website. More information on the legislation is provided in **annex 1**.

We are required by the Well-Being and Future Generations Act (2015) to carry out our remit in line with the principles of sustainable development. Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the **well-being goals**. You can find out more about [our approach to improving the social, economic, environmental and cultural well-being of Wales](#) by visiting our website. More information on the legislation is provided in annex 2.

We are looking to make the most of the land we manage for the people, economy and environment in Wales to meet our obligations in these two pieces of legislation.

As a land manager, this means considering how best to take a joined-up approach to managing our natural resources in order to build a healthy and resilient environment that can support economic and social prosperity for generations to come.

In carrying out the formal review we will be openly consulting on the evidence that we're gathering to inform our decision.

We know that there will be differing opinions about the use of firearms and this is why we want to be open and transparent about the evidence we gather and the decisions we make.

4. The use of firearms

Firearms are used on NRW managed land for a variety of purposes.

4.1 Management of pests

Certain species can impact on the objectives of our management of the land. Our objectives include conservation of species and habitats of local, regional, national and international importance (such as Sites of Special Scientific interest, Special Areas of

Conservation, Areas of Outstanding Natural Beauty, Environment (Wales) Act schedule 7 species) and the management of invasive non-native species. Additionally we minimise damage by pests that limit the ability of the land we manage to meet Welsh Government policy objectives and maintain its capacity for the people of Wales to derive a range of benefits. This includes the economic potential of quality timber products from our management of the Welsh Government Woodland Estate.

We control wild deer numbers (both native and non-native species) to reduce the impact they can have on achieving the objectives of Welsh Governments 2009 'Woodlands for Wales Strategy'. The strategy seeks to increase woodland cover in Wales with more native broadleaf woodland, an increased diversity of woodlands to improve their resilience (for example to climate change, pests and diseases) and greater regeneration of woodlands both through planting and natural regeneration. Management of wild deer populations is carried out in accordance with Welsh Governments 2011 'Wild deer management in Wales' strategy. Control is carried out by our highly trained staff applying best practice standards to ensure animal welfare.

We manage many sites designated for their special nature conservation value and we are required to tackle factors that negatively affect the habitats and species for which the site is designated. This can include control measures for unchecked native species and non-native species. Where no other method can effectively be employed to minimise these impacts firearms are used, for example mink control on sites where water vole are present.

4.2 Use of NRW land by third parties.

We consider applications by third parties to carry out activities on the land we manage. Currently NRW leases six areas of forest land to third parties for the purpose of pheasant shooting. All shooting activity must be managed to best practice standards with an agreed management plan including public safety measures. None of the leases inhibit public access or our own interests in managing the land, e.g. timber production.

There are significant areas of the Welsh Government Woodland Estate which are leasehold and the landlord has retained various rights, this can include shooting rights. We cannot restrict the holders of these rights from exercising them. Therefore these areas are outside the scope of this review.

There are additional areas of land owned or managed by us where the deeds or lease agreements require us to lease the shooting rights.

4.3 Exempt hunting

We have legal responsibilities to control some pests that may be on the Welsh Government Woodland Estate that may cause damage to livestock or crops of farming neighbours. To not to do so could potentially give rise to legal claims against us. The Hunting Act (2004) provides for this by allowing 'exempt hunting'.

We will only consider issuing licences where a neighbouring landowner is suffering actual losses or is at risk of suffering losses arising from predation by foxes or other wild mammals that are coming from Welsh Government Woodland Estate. Before issuing a licence the prospective licence holder will need to provide documentary evidence from the neighbouring landowner that there is such a risk.

5. Call for evidence

As part of the review NRW invites stakeholders to submit evidence to inform the review. The evidence should consider the use of firearms on land managed by NRW against the principles of Sustainable Management of Natural Resources and contribution to the Well Being and Future Generations Act goals.

Acceptable evidence types are:

- Published / peer reviewed journal publications
- Technical / research papers and reports
- Government agency / research group or committee reports, working papers
- Conference proceedings
- Official publications
- Academic publications
- Trade publications
- Observational studies - historical or recent
- Systematic review
- Expert opinion without critical appraisal – only if supplied with proof of professional membership of a recognised professional body such as the Chartered Institution of Water and Environmental Management.

Evidence types that will not be accepted are:

- Popular publications
- anecdotal findings
- opinions
- ideas

Please consider the suggestions in **table 1** which are given only as helpful prompts. You are not confined to providing evidence in relation to these questions.

Table 1

Suggestions to help you decide if your evidence is relevant to our review

WBFF/SMNR	Pest control	Third party activity	Exempt Hunting
A Prosperous Wales	Does the use of firearms in the management of pests contribute to the economy of Wales?	Do you have evidence that demonstrates that shooting/the use of firearms provide employment opportunities or contribute to the development of a skilled population?	Does the use of firearms in exempt hunting contribute an economic return to people of Wales?
A Resilient Wales	Does the use of firearms in the management of pests contribute to the maintenance and	Does the use of firearms in third party activities on our land contribute to a	Does the use of firearms in exempt hunting contribute to the maintenance of

	enhancement of a biodiverse natural environment?	biodiverse natural environment?	a biodiverse environment?
A Healthier Wales	Does the management of pest impacts on the environment contribute to health and well being?	Do shooting activities provide opportunities which contribute to people's physical and/or mental well-being?	How does exempt hunting contribute to health and well-being of people in Wales?
A Wales of Cohesive Communities	Does the management of the impacts of pests develop or maintain community relationships with NRW?	How do third party firearms activities on the NRW estate impact on the development of cohesive communities?	Does permitting exempt hunting on NRW land build community cohesion in rural areas?
A Wales of Vibrant Culture	Does the management of pests to maintain the ecosystems on NRW land contribute to the culture of Wales?	Do third party shooting activities on NRW land contribute to the culture and heritage of Wales?	Does exempt hunting form contribute to the maintenance of the culture of Wales?
A Globally responsible Wales	Is the use of firearms in the management of land a positive contribution to the well-being of Wales and beyond?	Does the use of firearms in third party activities on NRW land contribute to the wellbeing of Wales and beyond?	Is the use of firearms in the management of land globally responsible?
Sustainable management of Natural Resources	Are there viable alternatives to using firearms in sustainably managing pests?	How do shooting activities impact on the natural environment?	Are there viable alternatives to exempt hunting on NRW land to sustainably manage pest impacts on neighbouring landowners' interests?

6. How and when to submit your evidence

The review will consider the submitted evidence and develop proposals for the use of firearms on land managed by NRW. These propositions will form a public consultation on the issues raised. Following consideration of the consultation responses NRW will publish its position statement on the use of firearms.

This call for evidence will be open from 6th February 2017 – 30th April 2017.
Please submit your evidence to:

Shooting.review@naturalresourceswales.gov.uk
Adolygiad.saethu@cyfoethnaturiolcymru.gov.uk

Or by post to

Shooting Review
Natural Resources Wales
c/o Customer Care Centre
Ty Cambria
29 Newport Rd
Cardiff
CF24 0TP










Please note that in the interests of transparency and openness

All responses to this consultation, including the names of respondents and reports or documents we receive may be made publicly available and may be published on the NRW website (if copyright allows).

We may also share any responses, reports or documents that we receive with Welsh Government in order to help ensure a coordinated approach to this consultation.

Any personal information you provide to us will be used and stored in line with the requirements of the Data Protection Act 1998. We will **only** use your information for the purposes of this consultation. If you feel that any of the information provided in your response to the consultation is sensitive or confidential, you should explain why as part of your response. **However** NRW is bound by the Freedom of Information Act 2000, the Environmental Information Regulations 2004, and we may be obliged to provide information, on request, to third parties.

Annex 1

Principles of sustainable management of natural resources		
	Adaptive management	manage adaptively by planning, monitoring, reviewing and where appropriate, changing action
	Scale	consider the appropriate spatial scale for action
	Collaboration and engagement	promote and engage in collaboration and cooperation
	Public Participation	make appropriate arrangements for public participation in decision-making
	Evidence	take account of all relevant evidence, and gather evidence in respect of uncertainties
	Multiple benefits	take account of the benefits and intrinsic value of natural resources and ecosystems
	Long term	take account of the short, medium and long term consequences of actions
	Preventative action	take action to prevent significant damage to ecosystems
	Building resilience	take account of the resilience of ecosystems, in particular the following aspects: <ul style="list-style-type: none"> (i) diversity between and within ecosystems; (ii) the connections between and within ecosystems; (iii) the scale of ecosystems; (iv) the condition of ecosystems (including their structure and functioning); (v) the adaptability of ecosystems

More information can be found in [our booklet](#) introducing the Sustainable Management of Natural Resources.

More information can be found from the [Welsh Government website](#)

Annex 2

The Well-Being Goals are:

A prosperous Wales - An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.

A resilient Wales - A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).

A healthier Wales - A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.

A more equal Wales - A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).

A Wales of cohesive communities - Attractive, viable, safe and well-connected communities.

A Wales of vibrant culture and thriving Welsh language - A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.

A globally responsible Wales - A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being

More information can be found from the [Welsh Government website](#)

¹ Natural resources

In this Part, "natural resources" includes (but is not limited to)—

- (a) animals, plants and other organisms;
- (b) air, water and soil;
- (c) minerals;
- (d) geological features and processes;
- (e) physiographical features;
- (f) climatic features and processes.