



Consultation Response

FROM THE RSPCA IN WALES

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

April 2017

The RSPCA is grateful for the opportunity to respond to Natural Resources Wales consultation on the use of firearms on NRW land. Below follows the layout provided in the consultation document, namely to discuss the management of so called 'pest' species, the use of NRW land by third parties and exempt hunting.

THE MANAGEMENT OF PESTS

The RSPCA is not against the killing or taking of wild animals when necessary but there must be strong scientific evidence that there is a legitimate case for the taking and killing of wild animals in each instance. The RSPCA believes that any decisions made to take action against a wild animal, for whatever reason, must be subject to a clear and transparent process, so that the public may see what action is being taken and the justification for it.

To this end, the RSPCA collaborated with a number of other like-minded groups in a workshop to develop some principles for ethical wildlife management. These principles, listed by Dubois *et al*¹, set out such a process, with a clear framework of how these decisions should be made.

As part of NRW's commitment to deliver sustainable management of Natural Resources, the RSPCA believes that any decisions made by NRW should be made using this framework, so that each decision can be fully justified to the Welsh public. For example, during a meeting with Welsh officials when discussing a code of practice for snares (23/05/14), we were told that most snaring in upland Wales is to control foxes that take lambs. We asked what evidence there was to support this, or that snaring foxes to prevent lamb predation actually works. There is not, as far as we are aware, good data to show that such practices lead to an improvement in lamb survival and so result in an economic gain for the farmer², whereas better husbandry may be more productive in reducing lamb fatalities.

Once there is clear justification for the need for control, alternative strategies to manage the perceived problems caused by so-called pest animals should be attempted and efforts fully recorded, so that it is clear to all that efforts to avoid lethal control have been attempted.

Therefore, before NRW permits shooting on its land to control so-called 'pest' species, it should demand evidence that all other methods of managing the problem have been attempted and demonstrated to have failed. NRW should also fund, or contribute to in other ways, research into other methods of control, such as the use of immunocontraceptives for grey squirrels³.

¹Dubois, S., Fenwick, N., Ryan, E. A., Baker, L., Baker, S. E., Beausoleil, N. J., Carter, S., Cartwright, B., Costa, F., Draper, C., Griffin, J., Grogan, A., Howald, G., Jones, B., Littin, K. E., Lombard, A. T., Mellor, D. J., Ramp, D., Schuppli, C. A. and Fraser, D. (2017), International consensus principles for ethical wildlife control. Conservation Biology. doi:10.1111/cobi.12896

²Baker, P., Harris, S. & White, P. After the hunt. The future for foxes in Britain. (IFAW)

³Massei and Cowan, 2014, Fertility control to mitigate human-wildlife conflicts: a review

USE OF NRW LAND BY THIRD PARTIES

The RSPCA has major concerns about the use of NRW land for shooting game such as pheasants, but these are largely based on the practices involved in rearing the birds and the techniques used to control potential predators of the birds or their eggs.

The Farm Animal Welfare Council reported that intensive game bird rearing results in mortality rates of between 5 and 20%⁴ before release and then another 25-30% after release through issues such as road traffic accidents or what might be called 'natural wastage'. Defra funded research⁵ into the differences between standard and enriched cages for pheasants, the results of which the RSPCA believes are still open to question. We believe that the welfare of intensively reared game birds is still poor and that current codes of practice⁶ fall short of what is required to protect the welfare of these birds.

There are other impacts associated with the intensive rearing of pheasants that we feel are not compatible with having a Resilient Wales or a Sustainable Management policy. Bicknell *et al.* report that, although the management of land for pheasants can benefit some elements of biodiversity through the cultivation of headlands and cover, mostly on estates that are not solely reliant on releasing birds every year, there are also negative impacts too, through increased competition for food, possible disease risks, and modifying habitats and so reducing nesting opportunities for songbirds⁷. And although reducing predators may lead to an increase in the numbers of prey at the end of the season, so benefiting the shooters, this rarely translates into increased breeding numbers the following season. So the conservation benefits provided by shooting tend to be specific to certain estates, depending on their management practices and cannot be considered as applicable to a national scale.

As for activities used to control predators, we have already touched on those in our response to the management of so called 'pest' animals. The RSPCA would expect NRW to consider the conservation of all species that are present on its property but we are not aware of any work to review the impact of predator control on predatory species such as birds of prey or weasels and stoats. We feel that assumptions that these animals need control are not supported by evidence, and that the lack of evidence about the populations of some of these species overall means that their continued control cannot be justified.

The RSPCA also has concerns about the use of lead in shooting. There is good evidence to show the impact that lead has on non-target species, such as birds of prey who scavenge on carcasses of shot birds that are not retrieved, and on waterfowl when shot is ingested by them⁸. We do not believe that the use of lead on public land fits with NRW's commitment for both a Healthier Wales and a Globally Responsible Wales. This is particularly important for any NRW land that is accessible to the public, as they, or their pets, may be exposed to spent lead shot or dead and dying birds.

EXEMPT HUNTING

As stated above, the RSPCA will always challenge the need to take or kill wild animals unless there is good scientific evidence to support the need to do so. When such management is required, then the RSPCA believes that decisions should be made using the ethical decision process described by Dubois *et al* (as above). If this approach were used, then we believe there would be no need for NRW to permit exempt hunting, as alternative measures would probably be more effective at managing the situation.

⁴Farm Animal Welfare Council (2008) Opinion on the welfare of farmed game birds. Report to Defra

⁵Matheson, SM, Donbavand J, Sandilands V, Pennycott T and Turner, SP. (2015) An ethological approach to determining housing requirements of gamebirds in raised laying units. *Applied Animal Behaviour Science* DOI: 10.1016/j.applanim.2015.02.001

⁶Welsh Assembly Government (2011) Code of practice for the welfare of gamebirds reared for sporting purposes

⁷Bicknell J., Smart J., Hoccom D., Amar A., Evans A., Walton P., Knott, J. (2010) Impacts of non-native gamebird release in the UK: a review. RSPB Research Report Number 40. ISBN: 978-1-905601-26-4.

⁸Pain, D.J., Cromie, R., Green, R.E. (2014) Poisoning of birds and other wildlife from ammunition-derived lead in the UK. In Delehay, R.J & Spray, C.J (eds) (2015). Proceedings of the Oxford Lead Symposium, Lead ammunition: understanding and minimising the risks to human and environmental health. University of Oxford, UK. Pp 48-84. <http://oxfordleadsymposium.info/proceedings/>