



The Petitions Committee  
National Assembly for Wales  
Cardiff Bay  
CF99 1NA

30 May 2018

Dear Committee Members

The League Against Cruel Sports would like to thank the Committee for considering petition P-05-816 'Say NO to pheasant shooting on Welsh public land.'

We have been invited to respond to the Welsh Government's initial response to the petition – a letter from Cabinet Secretary Lesley Griffiths that was sent to the Committee.

We would like to draw the Committee's attention to the fact that since the petition was submitted and the NRW public consultation closed, Animal Aid and the League Against Cruel Sports have requested that the two independent reviewers – Dr Hillyard and Professor Marvin – employed to oversee the consultation process, should be removed from the process. This followed our discovery that Dr Hillyard goes shooting and that Professor Marvin's research papers demonstrate an interest in 'country sports' – I have included at the foot of this letter a copy of an article on the matter which was published in the Western Mail on 22 May 2018. We have also written to the Cabinet Secretary and the NRW Chief Executive and Chair fully outlining our case. We are currently awaiting replies to these letters.

The Cabinet Secretary acknowledges in her letter to the Petitions Committee that the NRW review of shooting was triggered by ethical and bird welfare concerns raised with Welsh Government and NRW, yet both issues received little attention in the consultation, and on page 2 of their External Assurance Review report, Hillyard and Marvin partially acknowledge this: '*NRW was not charged with exploring these ethical issues. We have not considered issues of ethics in our reading of the submissions*'.<sup>[1]</sup> There seems to be confusion of purpose in the whole review process.

---

<sup>[1]</sup> <https://naturalresources.wales/media/683949/paper-4-external-assurance-report-hillyard-and-marvin-2017.pdf>

The Cabinet Secretary also references the Code of Practice for Game Birds Reared for Sporting Purposes.<sup>[2]</sup> Referencing this Code of Practice is the standard response from Welsh Government whenever concerns about game bird welfare are raised. While this is a statutory Code, there are no independent checks undertaken to assess whether the Code is being followed by game bird breeders, so in practice, compliance with the Code is voluntary. There are no inspections of game bird rearing sites carried out by the Animal and Plant Health Agency. Any inspection of a game bird rearing site would only be carried out in response to a welfare concern raised directly with APHA or the local authority but given that game bird rearing facilities are private businesses, it is highly unlikely that any welfare breaches would be detected and reported. In addition, the Code itself is eight years old and is insufficient to guarantee the welfare of the birds as it lacks even a basic minimum space requirement per bird. Animal Aid's investigations over a number of years have revealed that this Code is often disregarded with no consequences for the game bird producer. Just this year, Animal Aid has found birds kept in barren cages, at Bettws Hall game farm in Wales. We reported our findings to the Minister, the Animal and Plant Health Agency and the local Trading Standards department. A 2nd April email from Powys Trading Standards stated, *"I have been in contact with APHA Wales who have informed me, that, in response to your E Mail, they have carried out an inspection of the premises and that they found no breaches in legislation. I therefore have to advise that on this occasion Trading Standards will not be taking any further action in relation to the matter."* This is despite Animal Aid providing clear photographic evidence of barren cages in use at Bettws Hall. It cannot and should not be the case that the welfare of game birds has to be monitored by undercover investigations by animal welfare groups.

When the League Against Cruel Sports met with the NRW shooting review team in March this year we asked them to tell us the source of the birds that are shot on NRW land. They were unable to as they do not maintain any records of this type. Therefore they cannot claim, as they do in the consultation, that the birds shot on their land are reared in accordance with the Code of Practice for Game Birds Reared for Sporting Purposes. They do not know where the birds come from or whether the producer is Bettws Hall, or any other, which has been shown to be in breach of the Code in the past. In response to our concerns about the welfare of the birds at the point at which they are released to be shot, NRW responded that all shoots on its land follow the Code of Good Shooting Practice.<sup>[3]</sup> Unlike the Codes of Practice for Game Birds Reared for Sporting Purposes, the Shooting Code is entirely industry-produced and led and furthermore, once again, there are independent checks to assess whether or not the shooting participants are following it. We know that many birds are not shot cleanly and do not die instantly, and yet the Shooting Code only says 'On driven days, any wounded game should be retrieved during drives whenever it is safe and practicable to

---

<sup>[2]</sup> WG Code of Practice for the Rearing of Gamebirds for Sporting Purposes (2010).

<http://gov.wales/docs/legislation/inforcenonsi/animalwelfare/110106gamebirden.pdf>

<sup>[3]</sup> <http://www.codeofgoodshootingpractice.org.uk/pdf/cogsp2017.pdf>

do so.' This results in injured birds being left to suffer while a shoot continues which is entirely unacceptable.

Animal Aid's investigations of 'game' birds kept on NRW land found breaches of both welfare and industry Codes. In 2017, 35-40 dead game birds were discovered inside a release pen on NRW-leased land. In addition, undercover visits to 'game' farms found breeding birds kept in entirely barren cages, again in breach of the welfare Code. In 2017 Animal Aid conducted an undercover investigation which found dead, trapped and suffering 'game' birds on NRW land and land adjacent to it <https://www.animalaid.org.uk/dead-trapped-birds-natural-resources-wales-land/>. In 2015, League Against Cruel Sports professional investigators visited shooting estates in Wales and exposed the indiscriminate practice of snaring which is cruelly killing Welsh wildlife. The video also contains footage of the appalling conditions 'game' birds are reared in: <https://m.youtube.com/watch?v=TX0GylQZVW4>

Welsh Government and NRW cannot ignore the level of public opposition to the shooting of birds for sport. Public opinion matters, especially in relation to activities taking place on public land. In addition to the 12,700+ people who signed the petition that will be considered by the Committee, a YouGov poll commissioned by the League Against Cruel Sports and Animal Aid in April 2018 found that 74 per cent of people polled in Wales answered 'No' to the question 'Do you think that shooting birds for sport should be illegal or legal?' and after learning how chicks are bred for sport shooting, 76 per cent said they oppose the shooting of game birds for sport on publicly owned land in Wales. The full polling questions and breakdown of results are available at [https://d25d2506sfb94s.cloudfront.net/cumulus\\_uploads/document/1qaemiv24u/YG-Archive-230418-League%20AgainstCruelSports.pdf](https://d25d2506sfb94s.cloudfront.net/cumulus_uploads/document/1qaemiv24u/YG-Archive-230418-League%20AgainstCruelSports.pdf) .

Thank you for your consideration of this petition.

*Bethan Collins*

Bethan Collins  
Senior Public Affairs Officer, League Against Cruel Sports

# Shooting consultation's experts come under fire

**MARTIN SHIPTON**

Chief reporter

[martin.shipton@walesonline.co.uk](mailto:martin.shipton@walesonline.co.uk)

**A**NIMAL rights groups have criticised Wales' biggest quango for hiring an academic who herself goes shooting to evaluate a consultation on whether the killing of birds for sport should be permitted on its land.

Dr Sam Hillyard of Durham University was one of two academics who won the contract from Natural Resources Wales.

The other, Professor Garry Marvin of the University of Roehampton, specialises in the interaction between humans and animals.

NRW is conducting the review following increasing opposition to its policy of allowing pheasant shooting on publicly owned land.

Last month Animal Aid handed in a petition with more than 12,700 signatures to the National Assembly calling for a ban on shooting on land managed by NRW.

A YouGov poll at the same time found that 74% of people in Wales thought that shooting birds should be made illegal.

Fiona Pereira, campaign manager at Animal Aid, said: "We were deeply concerned to learn the identity of the academics assigned to review the evidence presented to NRW's

shooting consultation. The job should have been awarded to independent scientists who were specialists in the appropriate areas."

Bethan Collins, senior public affairs officer for the League Against Cruel Sports, said: "NRW commissioned this external assurance review because, in their own words, 'Due to the level of stakeholder

interest in this area, and the contentious nature of using firearms, we believe that additional independent assessment and evaluation of this evidence was required to ensure that the conclusions we have drawn, which form our recommendations and consultation proposals, are balanced, fair and unbiased.'

"We feel that in using Dr Sam Hillyard and Prof Garry Marvin to do this work, NRW have not met their own aim. Dr Hillyard is a sociologist whose research interests focus on the sociology of country sports and rural life. In documents that are freely available online, she says that she goes shooting herself.

"Prof Marvin is a social anthropologist whose research focuses on human-animal interactions and includes topics such as cock-fighting, bullfighting, fox-hunting and trophy hunting.

"In their report, Dr Hillyard and Prof Marvin argue for evidence submitted by a pro-shooting organisation, the Game and Wildlife Conservation Trust, to be given more weight by NRW and also comment on what they regard as the 'disproportionately cited' evidence of one respondent, Dr Jake Bicknell, who they note 'works for the RSPB' (the Royal Society for the Protection of Birds).

"We question why NRW felt that it was appropriate to contract Dr Hillyard and Prof Marvin to carry out this particular piece of work."

Ceri Davies, NRW's director of evidence, policy and permitting, said: "Our review has been extremely broad, as the new Environment Act requires NRW to plan and manage its work with sustainable management of natural resources as a foundation for all its decisions. The

review looked at how we manage our own land as well as the small amount of land that we lease out to third parties.

"All the evidence submitted during our 'call for evidence' stage of the review was given full and detailed consideration.

"The University of Durham and University of Roehampton provided an independent assurance role on the process undertaken in the evidence assessment stage and consideration of any gaps that there may have been in the evidence that NRW considered.

"We did not ask the assessors to make any comments on the contents of the review itself. The contract was awarded consistent with NRW's procurement policy and procedure"

Speaking on behalf of himself and Dr Hillyard, Prof Marvin said: "It's true that Dr Hillyard shoots and that my academic expertise relates to the interaction between humans and animals. It's understandable that the animal rights organisations will make political points about our involvement and I don't blame them for that.

"However, in my work I have never expressed support for any kind of hunting. NRW commissioned us to review the responses to the consultation and we did so professionally."