

## **HRLN 32 - Evidence from: The Countryside Alliance**

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Senedd Cymru | Welsh Parliament

**Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change,  
Environment, and Infrastructure Committee**

**Atal a gwrthdroi colli natur erbyn 2030 | Halting and reversing the loss of  
nature by 2030**

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Climate Change, Environment, and Infrastructure Committee

Dear Clerk

The Countryside Alliance notes the Committee's consultation "halting the decline in nature by 2030" and wishes to submit a response.

We hear much about the ambition to halt biodiversity loss and restore nature from the Welsh Government, the Senedd, Natural Resources Wales (NRW) and other charities and organisations. While this ambition is welcome, the reality in terms of policies falls far short. Indeed, the Countryside Alliance would note that many Welsh government policies and proposals, far from helping restore nature and supporting nature recovery, actually risk fuelling its decline. There is a failure to base policy on evidence and to work with rural communities, recognising that delivering nature recovery can only be done by those who actually manage the environment.

The Alliance would like to draw the Committee's attention to some examples of where the Welsh government and others have ignored the evidence and introduced damaging policies:

- The ban on humane cable restraints. The evidence is extensive which demonstrates the importance of these devices in successful predator control which is vital to the survival of many of Wales' rarest and most vulnerable species. The Welsh Government pressed ahead with an outright ban refusing to even consider a licensing scheme which would have enabled vital conservation work to have continued. The Game and Wildlife Conservation Trust (GWCT) say: "GWCT research demonstrates curlew, lapwing, golden plover, black grouse, hen harrier, red grouse, grey partridge and brown hare, all Section 7 species under the Environment (Wales) Act, are capable of population recoveries when predation management includes HCRs. The Upland Predation Experiment demonstrated curlew increased from 15% of pairs fledging young to 51% of pairs fledging young, enough to increase the population. It is highly likely the conservation successes of that experiment would not have been achieved without the use of HCRs. The average percentage of foxes caught in such restraints as part of total culling efforts in nine other successful conservation projects across the UK was 37%. These include a North Wales moor where 80% of foxes were caught by HCR, resulting in 93% of curlew pairs fledging young."
- The removal of the magpie and other species from General Licences (GLs). The first removal of the magpie and Jay from a GL was from GL004 – "Licence to kill or take certain wild birds for the purpose of conserving certain wild birds" despite NRW having reviewed the scientific literature and summarised 'there is a medium-high strength of evidence of some likelihood of a high effect of predation by magpie and jay on populations of wild birds'. Further reduction in the control of magpies came

from its removal from GL001- Licence to kill or take certain wild birds to prevent serious damage to livestock, foodstuffs for livestock, crops, vegetables or fruit or to prevent the spread of disease to livestock, foodstuffs for livestock, crops, vegetables or fruit". Whilst you can apply for an Individual Licence, this is likely to take weeks to be granted by NRW (as relayed by them,) thus leaving too much time between the problem arising and it being effectively dealt with. There appears to be no plan in place to monitor the impact on vulnerable wild birds.

- The ban on game shooting on Welsh Government land removed the conservation work undertaken by those shoot owners and gamekeepers associated with the shoots concerned. There has been no evidence of this contribution being replaced by NRW, thus leaving a void in the provision that was undertaken by gamekeepers.
- NRW were recently asked to undertake a consultation on the release of gamebirds in Wales on behalf of the Welsh Government. This resulted in NRW "pool sampling" the responses, instead of fully reviewing over 42,000 replies to their call to respond. On the basis of their sampling, they recommended to the Welsh Government that a ban on gamebird release should be implemented, only allowing release under licence. This could result in the reduction of the number of shoots in Wales and the consequent reduction in the number of hours of privately funded or voluntary conservation work undertaken over many hectares of land. The benefits to biodiversity of the management associated with shooting is well evidenced and loss of that management will have far reaching negative consequences for biodiversity. Indeed, the recently commissioned and updated Value of Shooting report states that shoots provide £10 million pounds worth of voluntary conservation activity annually in Wales. It should come as no surprise that when management for shooting stops, vulnerable wildlife suffers.
- The continued purchase of agricultural land to fulfil the Welsh Government's tree planting policy can also play a significant part to play in the loss of suitable habitat for the feeding, resting and nesting of ground nesting birds. Poorly planned planting, in certain formations and species of tree, can have a negative impact on biodiversity both above and below the soil. It is also noteworthy that the companies who purchase farmland to off-set their carbon emissions are eligible for Welsh Government funding for tree planting, which encourages this 'green washing'.
- Resourcing NRW adequately to deliver on halting nature decline and reversing biodiversity loss is critical. However, the Countryside Alliance is concerned about the way that NRW funds are currently managed and allocated. The recent purchase of several parcels of land at Brownhill, Llangadog includes the creation of Covid memorial woodland on productive agricultural land. This is neither a sensible use of resources either in terms of restoring nature or recognising the importance of food production. It illustrates a failure to have integrated and balanced policies.
- NRW has recently launched an internal review and announced the potential closure of three visitor centres as they aim to reduce their staff budget by £13m. Whilst they say that this is to ensure that they can deliver on prioritising nature, climate and minimising pollution, we would suggest that money is perhaps not being spent as wisely as it might.

In conclusion, whilst we fully support the ambition to halt the decline in nature by 2030, this can only be achieved by evidence-based policies that recognise the work of those

who live and work in the countryside and work with them. Undermining land managers, farmers and gamekeepers will simply make matters worse. The Welsh Government needs to reset its relationship with rural Wales if it is to halt and reverse nature loss. It cannot continue to put ideology before evidence and fail to ensure a joined up approach to policy, if it is to deliver on its environmental goals. The current approach seems hard to reconcile with well-being goals and threatens the future sustainability of Wales's rural communities.

[Welsh Government ban on humane fox trap risks curlew's extinction - Game and Wildlife Conservation Trust \(gwct.org.uk\)](https://www.gwct.org.uk)

[Shooting-in-Wales.pdf \(countryside-alliance.org\)](https://countryside-alliance.org)

[The enormous contribution of shooting revealed \(countryside-alliance.org\)](https://countryside-alliance.org)

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