

Number: WG19018



Llywodraeth Cymru  
Welsh Government

[www.cymru.gov.uk](http://www.cymru.gov.uk)

Welsh Government

## Consultation – summary of responses

# Consultation on banning the shooting of White-fronted Geese in Wales

July 2013



# **Contents**

<b>Overview</b>	<b>2</b>
<b>Purpose of the Consultation</b>	<b>3</b>
<b>Consultation period and distribution</b>	<b>3</b>
<b>Responses</b>	<b>4</b>
<b>Next steps</b>	<b>15</b>
<b>Annex A – List of respondents</b>	<b>16</b>

## Overview

Two types of White-fronted Geese (WfG) occur in the UK. The Eurasian (or European) race and the Greenland race. The global population status of the two races is significantly different. Eurasian White-fronted Geese (EWfG) are much more numerous whereas the global population of Greenland White-fronted Geese (GWfG) is categorised as “Endangered”.

The UK is important for GWfG. It is estimated that about half the world population occur here in winter. Whilst only small numbers of GWfG regularly over-winter in Wales, Welsh wintering birds are crucial to the maintenance of the national (and international) distributional range of the population. A number of historical wintering sites in Wales have already been lost. Failing to take appropriate steps to reduce as far as possible GWfG adult mortality eg: through the prohibition of hunting, could be seen as a failure to meet both international and domestic conservation obligations.

WfG are listed on Annex II, Part B of the Birds Directive 2009/147/EC meaning that, in respect of the UK, hunting of WfG may be authorised under article 7(3) of the Directive. This part of the Directive is transposed into domestic law under section 2, and Part 1 of Schedule 2, of the Wildlife and Countryside Act 1981 (WCA). This means WfG may be killed or taken outside of the ‘Closed Season’ in England and Wales. The closed season being 1 February – 31 August each year or, in relation to wild ducks and wild geese, in or over any area below high water mark of ordinary spring tides between 21 February – 31 August.

This proposal recognises the difficulty of distinguishing the two races under field conditions and reflects current legislation in Scotland and Northern Ireland where WfG are fully protected at all times by Wildlife and Countryside Act 1981 (as amended) and by the Wildlife (Northern Ireland) Order 1985.

**Purpose of  
consultation**

The purpose of the consultation was to seek views on a proposal to impose a statutory ban on the shooting of White-fronted Geese (WfG) in Wales throughout the year (including in the 'open season'). The statutory ban coming into force on 01 September 2013.

**Consultation period  
and distribution**

The consultation ran for a period of ten weeks starting on 11 February 2013 and closing on 19 April 2013. The consultation was published on the Welsh Government website and sent directly to a number of relevant shooting and conservation organisations.

## Responses

The Welsh Government would like to thank all those who responded to the consultation. Responses were received over the full consultation period between 11 February 2013 & 19 April 2013 inclusive. One response although arriving late (25 April 2013) was included in the analysis because it had originally been sent on time but to the wrong address. Over half, i.e. the majority of responses (56%; 73), were received in one single week period between 15 – 19 April during the final week of the consultation period.

In total 130 representations were received over the consultation period. Including all responses in the analysis 34% (44) were in favour of the introduction of a statutory ban, while a majority 66% (86) were not in favour of the introduction of a statutory ban.

However, if the analysis is restricted to the proportion of correspondents who answered the three consultation questions directly (only 29 of 130) 72% (21) were in favour of a ban and 28% (8) were against a ban. Table 1 presents a breakdown of respondents against sectors.

**Table 1. Responses received split by sector ranked by number.**

<b>Sector</b>	<b>Number of Responses</b>	<b>%'age of respondents</b>
Private individuals categorised as 'self'	102	78.5
Wildfowling Clubs, Associations & Federations	10	7.7
Nature Conservation NGOs, Wildlife Trusts, Bird Groups & Ornithological Societies	6	4.6
Shooting organisations, e.g. BASC	4	3.1
'Pro-countryside' organisations	2	1.5
Animal protection and welfare organisations & associations	2	1.5
Statutory Nature Conservation Agencies & National Park Authorities	2	1.5
Miscellaneous	2	1.5
<b>Total</b>	<b>130</b>	<b>100</b>

## Gender Profiles

Based on first names and/or titles of respondents when given 88% (115) of respondents were male and 8% (11) female. This pronounced gender unbalance amongst people responding to the consultation possibly reflects the male-dominated nature of wildfowling and outdoor sports shooting as hobbies or leisure activities.

For the subsample of respondents against the introduction of a statutory ban applying the same gender assignment caveats (n=82) the proportion of males was even higher at 98%.

Ignoring group and other affiliations for males alone 69% of respondents were against the proposed ban and 30% were in favour of a ban, while for females alone the situation was reversed, with only 18% against the proposed ban and a substantial majority of 82% in favour of a ban.

### **Qualifications**

Of the nine correspondents whose titles indicated a qualification at doctorate level 67% (6) were for the introduction of a statutory ban and 33% (3) were against.

### **Geographical Location of Respondents**

The geographical location of a high proportion of respondents was not given (51%; 66) and therefore could not be analysed because submissions sent by email, or simply messaged from iPhones and iPads, or similar electronic devices, tended only to give name, email address and, if organisational, the name of the organisation at most, and lacked location details or postal address. For some respondents location information could be deduced from business or public body details appearing in footers at the base of emails.

For those for whom geographical location could be established (49%; 64) the majority were from Wales (52%; 33), followed by from England (34%; 22) and then from Scotland (11%; 7). Two responses were received from outside the UK, one from Belgium and one from Denmark, one of which was from a former resident of mid-Wales.

### **Length of Response**

Four categories of response were defined, according to length, and based on the following semi-quantitative criteria:

- |               |   |
|---------------|---|
| <b>Short</b>  | responses comprising one or few lines, or at most just a couple of sentences.   |
| <b>Brief</b>  | responses of a few paragraphs.  |
| <b>Medium</b> | substantial responses, typically of a page or so approximately in length  |
| <b>Long</b>   | substantial and detailed responses generally of >1 page in length and typically having supporting information included. |

The response length breakdown was -

Short – 56 (43%), Brief – 46 (36%), Medium - 17 (13%), Long – 10 (8%).

Only 27 (21%) substantial, i.e. classed as being either 'medium' or 'long', responses were received, the majority being 'short' or 'brief'.

## **Consultation questions**

**Question 1. Do you agree with our conclusion that the population of Greenland White-fronted Geese in Wales requires further protection?**

**Question 2: Do you support the proposal to ban the shooting of White -fronted Geese in Wales throughout the year?**

**Question 3: Are there any alternative approaches which could be implemented to protect the population of GWfG in Wales with the same degree of clarity and certainty as set out in the Welsh Government proposal?**

## **Consultation Responses**

The consultation asked three separate and specific questions. However, the overwhelming majority of respondents (78%; 101) failed to set out direct answers to these three questions posed comprising the key part of the consultation and those that did often did not use the official consultation response form.

Most respondents submitted only short responses of a sentence or two in length. These typically comprised a brief position statement, such as '*I am totally against the shooting of white fronted geese*' or '*I support a general moratorium until the global population recovers*'. The high frequency at which certain identical phrases (or part-phrases) appeared in short responses from consultees categorised as 'self' suggested organised and co-ordinated effort, most likely from campaigning membership bodies.

Only 29 responses answered the three questions systematically in a structured fashion as requested and set out in the supporting consultation document. Only 1 of these responses was categorised as 'short' whereas 97% of responses compliant in this respect were categorised as 'brief' or longer, with 71% categorised as 'medium' or 'long'.

Only three handwritten letters were received; all of which were against the idea of the imposition of a statutory ban. The longer responses tended to represent collated consensus views and opinions of membership organisations, both pro- and anti-shooting, usually submitted by the chairman or lead representative on behalf of the organisation or association.



## **Issues Regarding the Allocation and Attribution of Respondents to the ‘Self’ Category**

Some respondents categorised as ‘self’ in the analysis openly stated that they were members of various relevant groups, e.g. Wildfowling Associations & British Association for Shooting & Conservation (BASC), and it was not always absolutely clear if their submissions constituted personal responses, or whether they were responding on behalf of their membership organisation.

Members of BASC were the most frequently represented amongst those respondents categorised as ‘self’ who declared organisational affiliation within their submissions. Some Wildfowling Associations also submitted separate responses from their committees on behalf of members.

Considering the weight of responses either ‘for’ or ‘against’ the proposal in simple numerical terms therefore there is the possibility that there is an element of ‘double-counting’ affecting respondents sending personal responses (99 of 130) whose views were also represented separately by organisations that they are themselves members of. It is probable that other ‘self respondents’ not disclosing specific affiliations were members of organisations. For example, a submission from one respondent was sent stated in a ‘personal capacity’ but from a BASC internet address with BASC disclaimer at the foot. Some respondents categorised as ‘self’ cited references to BASC policy stances. In particular it was not easy to know in all cases if some individual respondents from Wildfowling Clubs were representing either their clubs or themselves, or a combination of both. Undoubtedly a measure of potential ‘double-counting’ possibly also exists for members of wildlife organisations categorised as ‘self’ respondents.

Some organisations, e.g. Farmers’ Union of Wales (FUW), were crystal clear and more explicit in their covering letter that their submitted views were based on the results of internal consultations with their membership.

Some respondents employed by organisations and sending emails using their organisation’s email system clearly stated that they were speaking for themselves and were not representing the views or opinions of their parent organisations or employers.

### **Question 1. Do you agree with our conclusion that the population of Greenland White-fronted Geese in Wales requires further protection? (Yes, Mainly, Not at all). Why/Why not? What is your evidence to support your view/s?**

Of the 29 respondents answering the question specifically the majority (72%; 21) agreed with the conclusion that further protection is needed, 14% (4) mainly agreed, while 14% (4) did not agree at all. Combining the ‘yes’ and ‘mainly’ responses the proportion in agreement with the conclusion as stated was 86%.

A few respondents on both sides felt a decidedly more emphatic reply was needed; 'absolutely yes', contrasting with a diametrically opposed 'absolutely not at all'.

## Common Themes

### Key points made by respondents in agreement with the Q1 conclusion and in favour of the introduction of a statutory ban:

- Nature Conservation NGOs and wildlife groups were keen to commend the work of BASC and credit the commitment of individual wildfowling clubs in Wales in implementing and operating the current voluntary moratorium on the Greenland White-fronted Geese (GWfG) on the Dyfi and some parts of north Wales, and recognised that the moratorium had apparently been beneficial, played a positive role and was a good example of successful partnership working, stating that the '*voluntary moratorium has no doubt played a part in conserving the bird in Wales*'.
- Some respondents claimed, however, that despite the voluntary moratorium there was evidence to suggest that small numbers of GWfGs continue to be shot in Wales, most notably on Anglesey (perhaps birds from the Dyfi population in transit) and that this demonstrated that the voluntary ban was ineffective in delivering full protection. One bird study group said that shooting 'bag evidence' showed GWfGs were still being shot outside the voluntary 'no shoot' zone elsewhere in Wales. Shot birds, it was claimed, could account for the sizeable percentage decline in GWfG in Wales. Others stated that the voluntary moratorium was unenforceable and applied only to shooting association and Wildfowling Club members.
- Several science-based responses from ornithological groups outlined the scientific case for a ban citing a study undertaken at Wexford Slobs in Eire and concluding that from its findings there was (i) a clear scientific case that hunting cannot be undertaken in a sustainable fashion, (ii) a very strong scientific case that GWfG hunting on wintering grounds is additive to normal mortality, and (iii) the Wexford Slobs research demonstrated that every shot goose was not part of a 'hunnable surplus' that would have died anyway from other causes, but that each hunting loss was in addition to other sources of mortality as attested by the steep annual decline in population size through 2000s being arrested to a large extent by the cessation of hunting in Iceland in 2006.
- Most respondents stated that numbers of GWfG in Wales were small and that the bird was in serious decline across Wales and the UK, highlighting its high conservation status and emphasising that additional shooting mortality could be contributing adversely to population decline in view of its declining and

endangered world population. Flagged conservation status credentials for GWfG included IUCN 'Endangered' status on the global red list and presence on Annex 1 of the EU Directive on the Conservation of Wild Birds.

- Several respondents drew attention to that fact that GWfG are currently protected by legislation of the respective governments throughout its range states other than in England and Wales, which are the only two places within its range where hunting is still legal, one stating that it was '*perverse that it can still be legally shot in Wales*', and stressing that '*the scientific case for removing hunting completely to safeguard the population [of GWfG] is overwhelming*'. One ornithological society said that Wales is the only area on the GWfG flyway where the species was not legally protected.
- Many respondents highlighted Wales' and the UK's legal obligations in respect of GWfG, both at domestic and international levels, in particular under s.42 of the Natural Environment & Rural Communities Act (NERC) (2006) and as a UKBAP priority species - a key action being the removal of WFG from Schedule 2 part 1 of Wildlife & Countryside Act 1981 (as amended), and highlighting legal discrepancies and anomalies, such as that the bird was already protected in Scotland and N Ireland, and that minimising additional sources of mortality (explicitly delivered in part by full legal protection) was a priority action in the international action plan in the African-Eurasian Waterbird Agreement (AEWA) adopted May 2012. Other points raised by respondents commenting on the legal front included assertions that (i) a ban would ensure Wales fulfils its duty under the AEWA treaty and that (ii) agreement to remove all sources of avoidable mortality by the UK, Irish, Icelandic and Greenland governments is required under the International Population Action Plan for GWfG. The Countryside Council for Wales (CCW) commented that a statutory ban was needed so that Wales was compliant with the AEWA agreement.
- CCW also stated that GWfG are a qualifying feature of the Dyfi Special Protection Area (SPA) under the Conservation of Wild Birds EC Directive (1979). The SPA management plan states that shooting must be prevented in order to meet site management objectives and that statutory protection is '*highly desirable*'.
- Because of the restricted geographical scope of the current voluntary moratorium arrangement many respondents said that a statutory ban would provide wider protection in areas away from the Dyfi estuary, e.g. over and on agricultural land, and that complete protection would serve to help maintain its current small global range.

**Key points made by respondents disagreeing with the Q1 conclusion and not in favour of the introduction of a statutory ban:**

- The majority of respondents made their support known for the effectiveness and success of the current voluntary ban on the Dyfi estuary, stating that this had been in place since the 1970s and claiming it had achieved protection with '*no lack of observance*'. One respondent pointed out that BASC had recently (in 2012) secured further protection under an additional voluntary moratorium agreed by Wildfowling Clubs across north & west Wales. Some respondents said that the imposition of a statutory ban would (i) not aid the conservation of GWfGs, (ii) send the 'wrong signal' to these people and (iii) set back good relations between the respective parties.
- On the issue of the effectiveness of the voluntary ban Wildfowling Clubs stated that there was no evidence that the voluntary ban was not working and clubs stressed that at no time had there been an incident or claim of anyone shooting a GWfG on the Dyfi in the 40 years since the moratorium came in, evidenced by monthly wildfowl count data indicating no GWfGs had been shot. On the contrary one respondent mentioned that the AEWA agreement had affirmed the effectiveness of the ban on probably preventing the Dyfi estuary flock from becoming extinct. The claimed effectiveness of the moratorium was put forward as a principal argument against the need for statutory legislation with many respondents arguing that for this reason legislation was unnecessary and that it would just constitute a waste of Welsh Government time and resource and that it would entail additional costs in respect of enforcement and policing.
- Wildfowling acknowledged the decline of the GWfG population in Wales, while making it clear that with a population numbering in millions there was no evidence that the Eurasian/European race was under any threat, but stressed that a far greater understanding of all the other environmental factors which could have a detrimental effect on GWfG population numbers was needed. The decline in GWfG numbers was most often attributed to birds 'short-stopping' of UK wintering grounds at extra-UK staging sites because of climate change. Some respondents called for more time in order to assess the effectiveness of the Dyfi voluntary moratorium, perhaps implying some uncertainty about its effect to date.
- A number of respondents said that the simplest way to achieve protection would be by extending the current voluntary ban on GWfG to cover the whole of Wales. There was overwhelming support for the principle of voluntary protection over statutory protection.
- Several respondents probed and questioned the scientific evidence base on whether shooting had in anyway contributed to the decline of GWfG in Wales,

flagging up that GWfG numbers had continued to decline in Scotland and N. Ireland despite statutory protection being introduced and maintaining that there was clear scientific evidence that shooting had no effect on WfG populations. Some claimed that any reduction of GWfG on the Dyfi was certainly not as a result of shooting and that banning shooting would have no effect on GWfG population size.

- One respondent claimed that because the current voluntary moratorium was effective the proposal for legislation was not proportionate to the threat and asked the question, '*why ban something that does not take place?*'

Many of these points were also made by respondents not answering the consultation questions directly.

### **Other Points Made**

A couple of respondents mentioned the damage flocks of feeding geese can cause to agriculture production, specifically to fields of recently sown arable crops, giving personal examples. Another respondent suggested that some birds may be being shot inadvertently, or through of a lack of awareness, by farmers during crop protection.

### **Question 2. Do you support the proposal to ban the shooting of Greenland White-fronted Geese in Wales throughout the year? (Yes, Mainly, Not at all). Why/Why not? What is your evidence to support your view/s?**

Of the 29 respondents answering the question specifically the majority (72%; 21) agreed with the proposal to ban the shooting of GWfG in Wales throughout the year while 28% (8) disagreed.

Compared with question 1 answers to question 2 were more polarised with no one opting for the 'mainly' option, in contrast to question 1 where the four respondents selecting 'mainly' all answered either no or 'not at all' to question 2.

### **Common Themes**

#### **Key points made by respondents in support of the proposal to ban the shooting of GWfG in Wales throughout the year:**

- A recurring theme was the difficulty in distinguishing the two races of WfG apart, visually, when in flight, because of their close similarity, the safest discriminating character being bill colouration, orange in the Eurasian race and pink in the Greenland race. Respondents stressed a shooting ban for all WfG made sense if only for this reason, i.e. because of the risk of misidentification. CCW commented it was '*difficult if not impossible to tell the two races apart in flight*'. Variation in bill colouration is a recognised problem for ornithologists trying to positively identify GWfG in flocks.

- The risk of accidental shooting was highlighted on numerous occasions as being especially important because of the small GWfG population.
- On a practical level it was claimed that the problem faced by shooters in discriminating WfG races in the field is compounded by the very short time available to them in which to make a decision (often only a few seconds) and problems of visibility at distance compounded by poor weather and at dawn and dusk when hunting takes place. Shooters may only have a small 'window of opportunity', therefore, once a bird has been sighted. Many respondents claimed that there was no possibility of a hunter positively identifying one form from the other in the timescales involved, nor indeed one grey goose species from the next. One goose study group stated that the two races were distinctly separable under good light conditions but when in flight and especially when wildfowling at dawn or dusk there was a high risk of confusion between them.
- Many respondents said that giving protection to all WfGs would eliminate the risk of accidental mortality from cases of potential mistaken identity and that this approach has been adopted successfully in Scotland.
- On the subject of banning all shooting of WfG on the problem of misidentification the point was made that removing only GWfG from the quarry list would expose shooters to legal sanction for failing to differentiate between the two races and that the proposed ban on shooting all WfGs makes a compelling case and would be a practical one therefore, pointing out this precedent has already been established in Scotland and Northern Ireland.

**Key points made by respondents against the proposal to ban the shooting of GWFG in Wales throughout the year:**

Many overlapping points and arguments raised in response to question 1 were reiterated.

- Regarding potential misidentification of the races many Wildfowling Clubs and individuals contended that there was no evidence for any confusion between Eurasian/European White-fronted Geese (EWfG) and GWfGs and any such risk would be '*very small to non-existent*'.
- Furthermore, because the Eurasian race stays mainly in England it was also claimed that there was no risk of mistaken identity, i.e. the problem does not arise. Some respondents pointed out that EWfGs do not overwinter on the Dyfi estuary.
- The claim that shooting did not have any adverse effect on GWfG populations recurred regularly in submissions and it was repeatedly asserted that poor GWfG numbers were to do with habitat factors and events in Greenland and Iceland and were not associated with hunting mortality.

- A recurring sentiment were statements to the effect that once a species is removed from the quarry list history shows it is never put back on; *'one-way' traffic*.
- It was re-stated that there was no evidence that GWfGs have been shot in Wales and that the voluntary ban is effective in protecting them.
- Many respondents highlighted the globally un-endangered and *'perfectly healthy population status'* of EWfGs, quoting variable population estimates of at least 1 million+ birds, drawing attention to the very strong worldwide population and its favourable conservation status in continental Europe.

### **Other Points Made**

One correspondent stated that in order to protect the democracy of free citizens they were simply against the imposition of regulatory bans.

**Question 3. Are there any alternative approaches which could be implemented to protect the population of Greenland White-fronted Geese in Wales with the same degree of clarity and certainty as set out in the Welsh Government proposal? What are they? What is your evidence to support your view/s?**

Of the 28 respondents answering the question directly most (68%; 19) thought alternative approaches did not exist, while 32% (9) thought that there were alternative approaches. One respondent did not provide a direct answer to the question but gave suggestions. Some respondents answering no to this question qualified their response with 'not as far as we are aware'.

### **Common Themes**

**Key points made by respondents of the opinion that there are no alternative approaches:**

- Several respondents made the point that the current voluntary measure and any similar adopted geographically extended measure brought would apply only to shooting association memberships and therefore in order to achieve full protection statutory legislation was needed.
- From the Welsh perspective respondents resigned themselves to the impossibility of changing the factors causing poor GWfG reproductive success operating on breeding areas in Greenland.
- From a biological perspective it was stated that the rate of change in overall population is dramatically affected by even small changes in survival, so even modest changes in mortality reduction can have large effects on overall population size in this long-lived species.

- There was a consensus that only a statutory ban would provide the best and complete protection and was the only viable approach to deliver clear and certain protection, 'clear and certain' being highlighted as the fundamental words.

**Key points made by respondents of the opinion that there are alternative approaches:**

- There were repeated calls to extend the voluntary moratorium across all of Wales and for Welsh Government to work with the Welsh Wildfowling clubs to ensure the effectiveness of existing and any future additional moratoria.
- One respondent suggested instigating a captive breeding programme in order to establish the reasons for the low reproductive rate of GWfG, saying that one had first been carried out by the Dyfi Wildfowling clubs in the 1970s.
- Some respondents called for the provision of subsidies and/or compensation for farmers for the damage done to agricultural crops by geese in general. One saying that permitting shooting encourages geese to keep to protected reserves where there is no disturbance, so effecting their conservation, and that this would make farmers less likely to want to shoot them.
- Many respondents said more attention needed to be given to issues of habitat quality and habitat management for overwintering GWfG in the Dyfi valley area, flagging the potential effects of grazing competition from intensive agricultural livestock on meadow and saltmarsh vegetation in the estuary. One respondent said there was '*not a lot of grazing room left for GWfG*' because of the intensity of sheep grazing in the area. It was suggested that GWfG-specific targeted agri-environment initiatives should be identified to reduce stocking levels and provide more GWfG grazing areas, along with a review of current grazing levels.
- Canada Geese were repeatedly singled out as probable biological competitors, both at home and abroad, and that a management strategy was needed for them on the Dyfi and in Greenland aimed at reducing population levels. One respondent suggested planting sacrificial crops to draw Canada Geese away from GWfG feeding areas on the Dyfi. Another asked if there were any plans to consider a cull of Canada Geese.
- There were calls for more far more monitoring and basic research to inform management needs on the Dyfi Estuary SPA, especially with regard to the influence of inter-specific competition with Canada Geese and possibly other goose species.
- Again some respondents thought insufficient time had elapsed for the voluntary moratorium to prove its effectiveness.



- Both pro- and anti-ban respondents called for continuing and increased co-operative working between all partners and stakeholders.

### **Other Issues Raised in the Responses**

A number of independent Scottish respondents from different Scottish Hebridean islands, including South Uist, the Isle of Bute and Islay, were all in favour of a statutory ban, saying that they had witnessed scientifically monitored population declines in GWfG in western Scotland and that numbers continuing to decline.

On the matter of the abandonment of Cors Caron (Tregaron Bog) by GWfG as an overwintering ground suggested explanatory reasons included the severity of the freezing winter of 1963, disturbance from low-flying and noisy military aircraft (the start of which correlates with the disappearance of the birds) and habitat changes, such as land drainage and reclamation, on and around the bog in the 1950s & 1960s.

One specific research suggestion was a survey of Anglesey to locate the sources of shot GWfG and to try and establish the wintering status of GWfG on that island.

Other suggested extra-UK factors in the bird's decline included the reduction of breeding productivity at nesting sites in Greenland (lack of recruitment), habitat issues (quality, loss and availability) in Greenland, late thaws in nesting areas, climate change in breeding grounds and generally meaning GWfG stop short on staging sites due to more favourable conditions farther north, increasing age of first breeding and poor fecundity and mortality of juvenile and adult birds.

### **Next Steps**

The responses to the consultation will be considered by the Minister for Natural Resources and Food. He will then decide whether to introduce a statutory ban on the shooting of White-fronted Geese in Wales throughout the year starting from September 2013 (the end of the current 'closed season').

## **ANNEX A - RESPONDENTS**

### **Organisations**

Animal Aid (AA)

Blackwater Wildfowlers Association (BWA)

Britannia Wildfowlers (BW)

British Association for Shooting & Conservation (BASC)

Common Decency (CD)

Countryside Alliance (Wales) (CAW)

Countryside Council for Wales (CCW)

Dee Wildfowlers & Wetlands Management Club (DWWMC)

Dyfi, Mawddach & District Wildfowlers Association (DMDWA)

Farmers' Union of Wales (FUW)

Federation of Associations for Hunting & Conservation of the EU (FACE)

Game & Wildlife Conservation Trust (GWCT)

Greenland White-fronted Goose Study (GWFGS)

Isle of Anglesey Wildfowling Club (IOAWC)

Lough Foyle Wildfowlers Association (LFWA)

Pembrokeshire Wildfowlers' Association (PWA)

Royal Society for the Protection of Birds (Cymru) (RSPB Cymru)

Royal Society for the Protection of Cruelty to Animals (Cymru) (RSPCA)

Snowdonia National Park (SNP)

Wells & District Wildfowlers (WDW)

Wentloog Wildfowling & Conservation Association (WWCA)

Welsh Ornithological Society (WOS)

Wildfowl & Wetlands Trust (WWT)

Wildlife Trusts Wales (WTW)

Y Foryd Wildfowling Club (YFWC)

**Individuals**

102 Private individuals categorised as 'self'