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Background

- Grouse moor management has played a key role in creating and maintaining our upland landscape, preserving and improving heather habitat and peatland, sustaining some of our rarest plants and wildlife, and promoting biodiversity.
- Grouse are a wild bird and, unlike pheasants and partridges, their population is not maintained or increased by the release of birds which have been hand-reared. Living on the moor all year round, red grouse are territorial and travel very little during their lives, and with the right conditions can breed prolifically. However, as ground nesting birds, they are particularly vulnerable to predators, disease, weather, and loss of suitable habitat, which makes the preservation of this unique species both demanding, and of considerable importance.
- Heather moorland in the UK is internationally important and it is widely recognised that grouse shooting has helped preserve it. Those calling for a ban on driven grouse shooting need to set out a viable, alternative vision for our uplands. The International Union for the Conservation of Nature has identified the three dimensions to the core of mainstream sustainability as being environmental, social and economic. All three need to be addressed by anyone wanting to see a change to the status quo, and any alternative land use needs to be at least as beneficial as that currently in place.

- It is because of their management for grouse shooting that more than 60 percent of England's upland Sites of Special Scientific Interest are managed grouse moors, and over 40 percent have also been designated as Special Protection Areas for rare birds and Special Areas of Conservation for rare vegetation under the EU Birds and Habitats Directives.
- The theory and practice of modern gamekeeping is focused on conservation and a respect for biodiversity. Modern gamekeepers are expected to have undertaken formal apprenticeships or college courses, gain practical qualifications, and attend best-practice courses.
- For many upland communities, grouse shooting plays a pivotal role in the local economy, providing a valuable source of jobs and income for local businesses. It also underpins the social life of these communities and helps to tackle rural isolation.
- Improvements in grouse moor management continue to be made on the basis of evidence and principle, with stakeholders working together. Grouse shooting is heavily regulated and controlled, with extensive legislation in place that has an impact on almost every aspect of grouse shooting and its associated integrated moorland management. Any additional legislation, or licensing requirements, would need to be consistent, evidence-based and principled.
- If people, both the public and governments, continue to value heather moorland landscapes, then they will need to be maintained. [Research](#) into the sustainability of driven grouse shooting published by the Institute for Social Innovation and Impact at the University of Northampton in August 2021 found that the current model of integrated moorland management, that includes driven grouse shooting as part of the economic and social mix, is a sustainable approach to maintaining such landscapes. Indeed, there was no evidence that any other management regime would deliver the same result.

1.0 Moorland Management

1.1 Heather Burning

- Rotational heather burning, also known in Scotland as 'muirburn', on shallow peat and dry heath is done to increase the diversity of heather age and structure. It is an essential tool for moorland managers when reducing the fuel load to help curtail the risk of wildfires, which has increased because of climate change and can cause significant environmental damage by burning into peat.
- Burning is done in small patches, the frequency of which depends on how fast heather is growing and becoming dominant in the area. It ensures a mixture of older heather for protection and nesting, younger heather for feeding, and a fresh burn where regrowth is just starting. It also acts as a fire break to help prevent the spread of uncontrolled wildfires and encourages the growth of peat-forming sphagnum moss which filters and absorbs water.
- The aim is to create lots of micro-habitats for a full range of habitats allowing the widest possible biodiversity. A low intensity 'cool burn' in small patches removes the canopy but prevents the burning of peat or moss beneath the vegetation, avoiding the resultant loss of carbon and delay in regrowth of the heather.

- On 16 February 2021, the government published new legislation ([The Heather and Grass etc. Burning \(England\) Regulations 2021 \(legislation.gov.uk\)](#)) to protect blanket bog habitats in England. The regulations, which came into force that May, prevent burning on areas of peat over 40cm deep on Sites of Special Scientific Interest that are also Special Protection Areas or Special Areas of Conservation, except under licence. This does not apply if the area to be burned in one burning season has a slope of more than 35 degrees or is more than half covered by exposed rock or scree, and in either case is a single area of 0.5 hectares or less, or is on two or more areas within 5 metres of each other with a combined area of 0.5 hectares or less.
- It was recognised that neglecting to manage moorland risks significant damage from wildfires, which have been increasing due to climate change. The new regulations therefore allow applications for a licence permitting to burn on blanket bog where otherwise prohibited. This may be granted where it is either beneficial or necessary:
 - For the purposes of conservation, enhancement or management of the natural environment;
 - For human safety;
 - To reduce the risk of wildfire;
 - Because the specified vegetation is inaccessible to mechanical cutting equipment, and any other method of management is impracticable.
- The statutory Code of Practice for heather burning, [The Heather and Grass Burning Code](#) (Defra, 2007) developed with key stakeholders, acknowledges that *“Fire has been used by land managers for many thousands of years. When used with skill and understanding, it can benefit agriculture, game birds and wildlife.”*
- The Code defines a ‘burning season’ running from 1 October – 15 April in upland areas, when roots are at their wettest to avoid a hot burn that can otherwise enter the peat. To burn in [environmentally protected areas](#), such as Sites of Special Scientific Interest (SSSIs), consent is required from Natural England and there are strict limits on how much heather can be burned at a time. More than 60 per cent of English grouse moors are designated as SSSIs. A licence is also required to burn in sensitive locations such as on a slope or near a watercourse.

1.2 Wildfire Prevention

- Large stands of rank and woody heather, left unmanaged, pose a major fire risk due to the build-up of fuel loads. The controlled rotational burning of vegetation can help reduce the risk of wildfires, which can cause considerable environmental damage as they burn with greater intensity, burning the peat beneath the vegetation and preventing peatland from storing water and carbon. Researchers from the University of York have also found that water levels are higher in moorland areas managed by burning than those left unmanaged, with the wetter landscape further diminishing the risk of wildfire.
- Wildfires are increasing with climate change, and in the first four months of 2025 over 113 square miles of the UK was burnt, according to figures from the Global Wildfire Information System; more than the total for any year in more than a decade. The cool, low intensity controlled burning of vegetation on peatland, as carried out on moorland managed for grouse, reduces the fuel load and helps reduce the risk of wildfires that burn with greater intensity and can cause considerable environmental damage by burning into the peat. Of those wildfires that took place in upland areas, all but a very small minority were on unmanaged moorland.

- A Scottish Government study of the controlled burning of moorland vegetation and wildfires which was undertaken by the James Hutton Institute and released earlier this year found evidence of wildfires over 107 square miles of Scotland's moorlands during a five-year period, with 96% of those occurring outside those areas where controlled burning was carried out. That study reinforces the findings of an earlier exercise undertaken by then Scottish Natural Heritage and the Scottish Fire and Rescue Service (SFRS) in 2018 which also showed that the correlation between the number of wildfires resulting in an SFRS call-out and areas managed through heather burning was extremely low. From a total of 153 fires, only four were in areas of managed moorland and none occurred during the burning season. All were due to accident or arson.
- The 2018 wildfire on Saddleworth Moor, which was followed by a further serious wildfire in February 2019, took 10 days to bring under control, involving firefighters from seven counties assisted by gamekeepers, wardens from the Peak District National Park, National Trust and RSPB, as well soldiers, farmers and other volunteers. The gamekeepers, who came from nine shooting estates from across the Peak District, provided much-needed experience and specialist firefighting equipment. Some four-square miles of moorland were destroyed, and the environmental damage was considerable. The moor had a no-burn policy.
- The 2019 wildfire of Scotland's Flow Country, which resulted from the moorland becoming overgrown, likewise severely damaged over 22 square miles of this UNESCO world heritage site. 700,000 tonnes of CO₂ equivalent were released into the atmosphere, doubling the country's greenhouse gas emissions for the six days it burned.

1.3 Scientific Evidence

- Heather growing on peat soil can quickly become dominant and out of control when left unmanaged. Methods of management have been an area of fierce debate for many years, and the use of controlled burning as a key element of moorland management remains controversial. Opposition often cites science that is now out of date and cannot be regarded as a safe basis for policy.
- Whilst some landowners have long opted to use fire as a method to manage vegetation, others use mowing, or choose to leave it unmanaged. Researchers at the University of York are undertaking a 20-year study to compare the impacts of these three management options in relation to mitigating climate change, increasing water storage and quality, and increasing biodiversity. Their findings after 10 years of that study, published in January 2023, were significant. Key findings included:
 - There is no 'one size fits all' approach that land managers should use, so heather burning, mowing and leaving vegetation unmanaged should all be available as management tools.
 - When compared with unmanaged plots, both burning and mowing heather support an increased diversity of vegetation, with higher levels of sphagnum moss that supports peat formation. The study predicted a greater number of some ground-nesting birds where heather was burnt or mown, many of which are red listed as being of conservation concern, because taller unmanaged heather limits appropriate nesting sites. Burning was found to be particularly good for carbon uptake and nutrient content for grazing animals.
 - Concerns around burning often focus on emissions from the fire. The study found that while carbon loss from burnt areas was higher than from mowing in the short term, as the vegetation regrew it fell, and new vegetation took up considerably

more carbon in the long term. Burnt plots absorbed more than twice the carbon of mown areas.

- Unmanaged plots were found to have a lower water table than those managed by burning or mowing. This could prove relevant to ongoing carbon storage projects, which employ significant resources to raise water tables on moorland areas to capture and retain more carbon.
- Unmanaged areas were also found to be drier, allowing microbes to decompose peat. This can present a fire risk. Damage caused by wildfires can be catastrophic because, unlike controlled cool burns carried out by grouse moor managers, they result in huge carbon losses due to the fire burning into the underlying peat.
- Although there are almost another 7 years remaining in this project, the interim findings are extremely important both for policy makers and moorland managers. Answers on how heather burning compares with mowing or leaving vegetation uncut are finally being given. No two moors are the same, and given the right conditions burning, cutting and leaving heather unmanaged should all be available management tools, depending on which is most appropriate for a particular piece of ground.
- The Future Landscapes Forum, a group of academics and experts with specialist knowledge of the management, ecology, functioning, and fire risk associated with heather-dominated landscapes in the UK, published a Position Statement on 23 August 2023. They expressed their growing concern that the debate about managing heather moorlands, including on peatlands, is neither properly informed nor evidence-based, leading to dangerous policy decisions that ignore the positive social and ecological effects of controlled burning. These decisions disregard a large body of evidence showing that burning can support wildfire prevention, carbon capture, and improve biodiversity.
- Moreover, they argued that the risks and impacts of alternatives such as cutting or no vegetation management remain largely unknown and are often ignored. There is *“no clear scientific consensus to support a blanket ban against controlled vegetation burning on heather moorland”*, and *“policy decisions are being influenced by special interest groups who regularly ignore or distort evidence in order to outlaw the practice”*.
- The debate has been derailed by undue focus on the issue of driven grouse shooting, leading to reductive arguments against controlled burning being presented as scientific consensus by influential individuals and organisations. They are so preoccupied with the issue of grouse shooting that they ignore all the evidence in favour of controlled burning and the risks of the alternatives, especially considering the devastating impact of wildfires.
- The evidence shows that controlled burning can often contribute to reducing the risk of wildfires, capturing carbon, and maintaining biodiversity.

1.4 Flood Prevention

- The accusation that grouse shooting contributes to flooding shows a lack of understanding about the work of grouse moor managers and the role they play in conserving heather and peatland across the uplands, which is some of the country's most valuable habitat.
- The drainage of peatland with agricultural drains, or 'grips', was once widespread in the uplands, and in the 1960s and 1970s successive governments offered farmers and landowners grants for draining their land; grants that were aimed at increasing agricultural productivity, not the number of grouse.

- The drainage of peatland has since been discredited and research undertaken by the Game and Wildlife Conservation Trust (GWCT) in the 1980s and 1990s into [Erosion and Moorland Drainage](#) found that drains continued to erode over time, and concluded that blocking these drains was the only way to reverse the deterioration of the moorland. Grouse moor managers, working in conjunction with government and other stakeholders, are actively working on a number of projects which include re-vegetation of bare peat and blocking government-incentivised drains in order to restore damaged peatland and encourage the growth of peat forming sphagnum moss which slows the flow of surface water and filters out discolouration.
- Peer reviewed research by the GWCT, published on 1 April 2021 in *Ecological Indicators*, shows how prescribed burning at appropriate temporal intervals can benefit peat-forming Sphagnum mosses by reducing competition from heather. GPS-mapped fires from 2009 to 2014 were visited in 2019 to measure the vegetation response and compare it with unburned control plots. Sphagnum cover in plots burnt eight to ten years earlier averaged five times higher than that in the no-burn control plots, and was positively correlated with peat depth. The results support earlier studies in Northern England, which showed that prescribed burning at regular intervals can increase Sphagnum cover by reducing heather cover and canopy vegetation biomass.
- Peat Restoration Partnerships have proved highly effective and are an example of stakeholders working together to restore peatland. In the North of England over 44,500 acres of moorland has been repaired and revegetated on land managed for grouse shooting, and in the North Pennines the work undertaken to block agricultural drains resulted in the North Pennines Area of Outstanding Natural Beauty Peatland Programme being awarded the Climate Change Award at the Durham Environment Awards 2015. Their [Management Plan](#) for 2014-2019 recognised that “sound grouse moor management can contribute significantly to the conservation and enhancement of natural beauty.” Over 7,000 Km of drainage ditches have now been blocked by grouse moor managers in order to re-wet the peat and to mitigate flood risk.
- A [Natural England Evidence Review](#) into The Effects of Managed Burning on Upland Peatland Biodiversity, Carbon and Water (Natural England, 2013) concluded “no evidence was identified specifically relating to the effect of burning on watercourse flow or the risk of downstream flood events. If there are any effects, these are likely to be highly site specific.” On the basis of that Review, the prominent ecologist Professor Jeremy Purseglove stated in [Countryfile Magazine](#) in January 2016 that any link between grouse moor management and flooding is “unproven”.
- There is no proven link between grouse moor management and flooding. What is clear, is that the concerted efforts of grouse moor managers to block agricultural drains and revegetate bare peatland contributes to slowing the flow of water through the catchment area. This work should be seen as part of any flood prevention strategy rather than a causal factor.

1.5 Predator Control

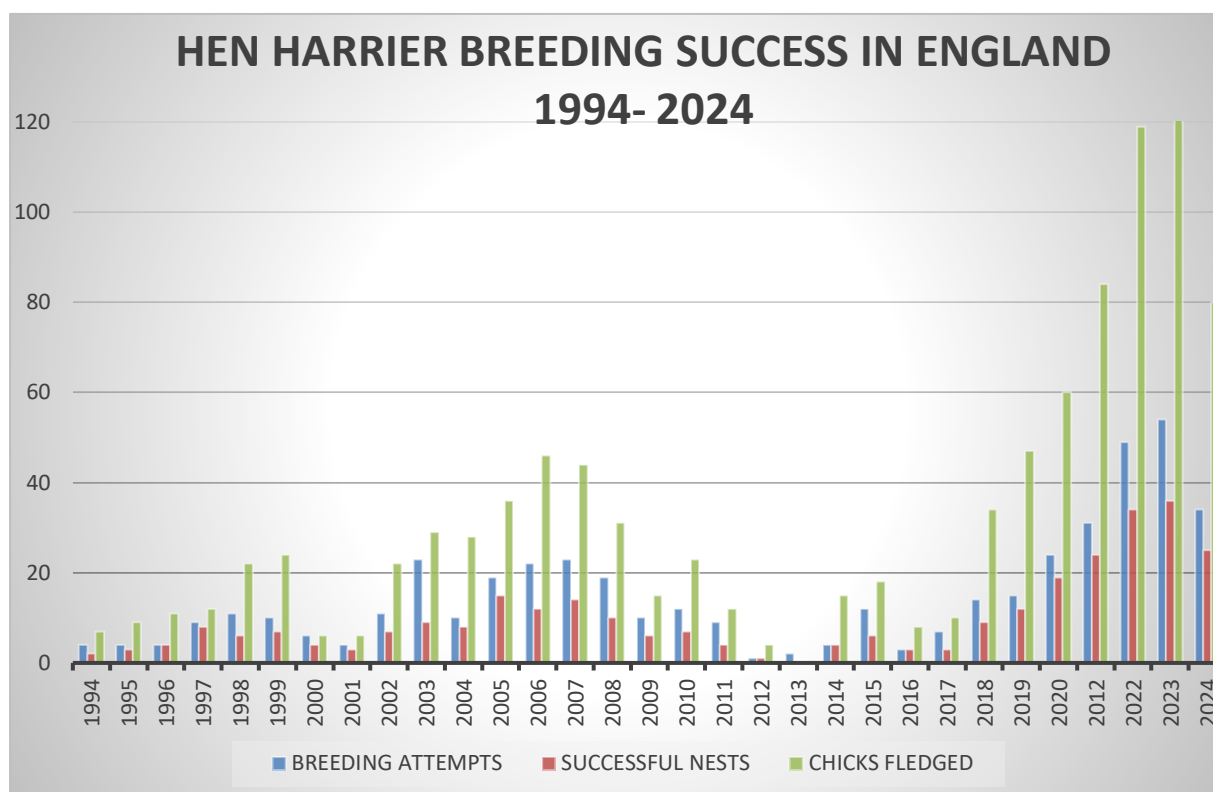
- As ground-nesting birds, the eggs and chicks of grouse are vulnerable to predation, and along with poor weather during the nesting season this can often lead to fluctuating population numbers. The lawful control of predators such as foxes, carrion crows, stoats and weasels, is therefore essential, benefiting not just grouse, but also the many other species of ground nesting birds which share the moorland habitat. These include red listed species of the highest conservation concern, such as black grouse, lapwing, skylark, curlew, grey partridge, and the UK’s smallest bird of prey, the merlin. Research has shown that merlin numbers have doubled on grouse moors in the last 20 years, compared to elsewhere where their numbers have more than halved.

- [Peer reviewed scientific research by the Game and Wildlife Conservation Trust](#) has shown that on moors managed for grouse shooting, ground nesting birds such as curlew and lapwing, which are amongst our species of the highest conservation concern, are 3.5 times more likely to raise chicks successfully. A survey of upland breeding birds in parts of England and Scotland also found that the densities of golden plover, curlew, redshank and lapwing were up to five times greater on managed grouse moors compared to unmanaged moorland.
- A new GWCT [study](#) published in March 2025, which revisits an earlier predation control experiment undertaken in North Northumberland in the earlier 2000s, reveals the devastating ecological impact of the withdrawal of legal predator control. During the original experiment, foxes and crows were controlled and ground-nesting birds experienced a dramatic improvement in breeding success. Populations of moorland species such as curlew, lapwing, golden plover, and red grouse all saw significant increases. However, within just a decade of stopping predator management, the situation was completely reversed. Fox numbers rose by 78%, and Carrion Crows by 127%. Meanwhile black grouse and grey partridge became locally extinct. Red grouse numbers dropped by 71%, golden plover by 81%, snipe by 76%, curlew by 24%, and lapwing by 58%. Importantly, the habitat was largely unchanged. One part of the study measured the height of dominant vegetation and there was no significant difference at the start and end of the period suggesting that the cessation of predator control was the key driver in bird declines.
- Black grouse, a species of the highest conservation concern, also benefits from this management. With a population that has declined 50 percent nationally, 96 percent of the surviving male black grouse in the North of England are found adjacent to moorland that is managed for red grouse, thanks to the management of predators. Black grouse are usually found on the lower parts of moorland where the need for predator control, including the use of humane restraints, is particularly important.
- Humane restraints have been shown to exceed the requirements set out in the Agreement on International Human Trapping Standards (AIHTS), are used to target individual species, and are an irreplaceable tool used in the conservation of many of our rarest species and in the protection of livestock. They are of vital importance to wildlife management, increasing biodiversity and protecting vulnerable species.
- The scientific research that has gone into investigating humane restraints is unparalleled when compared to other methods of generalist predator control. Indeed, the conclusion that humane restraints exceed AIHTS standards is corroborated by both a Defra trial and the peer-reviewed study by [Short et al., Wildlife Society Bulletin, 2012](#). Through the use of humane restraints, the government can bolster conservation efforts which are designed to protect and reverse the decline of our rarest species.

1.6 Protecting Birds of Prey

- All wild birds are protected by law. The main law applying to the management of wild birds is the Wildlife and Countryside Act 1981 which transposes the requirements of the EU Birds Directive as well as a number of international agreements relating to conservation. The 1981 Act protects all wild birds, their eggs and nests, and states that they cannot be killed or taken except in certain circumstances, for example, during the open seasons for game species or under the authority of a General or Individual Licence.
- The 1981 Act makes it an offence to disturb the nest or chicks of any Schedule 1 bird, which includes all species of harriers, peregrine falcons, golden eagles, white-tailed (sea) eagles, ospreys and many other moorland birds.

- The Countryside Alliance, along with the British Association for Shooting and Conservation, Moorland Association and National Gamekeepers' Organisation - four of the largest organisations representing shooting in England and Wales – have been joined by the Country Land and Business Association in publicly condemning all forms of raptor persecution. While many reports of such persecution have proven to be false, the illegal killing of birds of prey is still carried out by a small minority of irresponsible individuals, and we strongly condemn their actions, and have a zero-tolerance policy towards any such incident. There can be no place for them in a sector that is otherwise overwhelmingly positive; one that is the economic driver for many of our more remote communities, and the largest contributor to conservation schemes in England and Wales.
- Our countryside is a managed landscape, and it is an environment in which there can be instances of some species coming into clear conflict with land managers. But two developments serve to emphasise that the illegal killing of birds of prey is both unjustified, and self-destructive. Firstly, after the successful Judicial Review brought by McMoran against Natural England in 2015, farmers, gamekeepers, and others working to create an environment that balances human and ecological interests should be reassured that Natural England will treat applications for wildlife licences - including those to control buzzards - more consistently. Secondly, Defra's [Joint Hen Harrier Recovery Plan](#), which was published in January 2016 with the support of the RSPB, included a trial brood management scheme for hen harriers that provided relief for land managers suffering high predation losses during the nesting season in the uplands.
- The RSPB chose to withdraw their support of this long-awaited Plan in July 2016, only six months after it had been published, and before any brood management schemes had been trialled. They are the only conservation group to have done so, and they continue to maintain their objection to the scheme despite its overwhelming success.
- Just ten years ago, in 2013, there were no successful nesting attempts by hen harriers in England, but there are now more nesting than at any point since they were lost as a breeding species around 200 years ago. A total of 565 hen harrier chicks have now fledged since Natural England issued its first licence for the Brood Management Trial in 2018, and the figures for 2022 (119 chicks fledged) and 2023 (141 chicks fledged) were exceptional when compared with those during the previous 30 years. Although numbers were reduced in 2024 due to a poor breeding season which saw broods being lost due to the prolonged wet and cold weather, our chart showing the number of hen harrier breeding attempts, successful nests, and chicks fledged in England between 1994 – 2024, says all that needs to be said about the success of the Brood Management Trial for hen harriers. Without the cooperation, dedication, and hard work of game keepers on grouse moors, this would not have been possible.



- Figures from [Natural England](#)
- The interests of grouse moor managers and birds of prey are more interdependent than opponents of grouse shooting would like to admit. A study carried out by the Game and Wildlife Conservation Trust at [Langholm Moor](#) showed that hen harrier numbers went from a high of 20 in 1997, when the moor was managed by gamekeepers, to only four in 2006 after management had ceased, due to increasing fox predation and dwindling food supply. In contrast, the number of carrion crows, a common predator species controlled on most grouse moors, increased four times following the end of gamekeeper management. To maintain their population, the hen harrier needed the gamekeeper just as much as the grouse.
- The theory and practice of modern gamekeeping is centred on conservation and a respect for biodiversity. Gamekeepers need to understand the natural history of the habitats they manage, be able to use firearms and approved traps safely, legally, and with great field craft. The modern gamekeeper is required to undertake formal apprenticeships or college courses to gain practical qualifications, and attend best-practice courses on subjects such as using humane restraints, rodenticide use and rodent control.

2.0 Economics and Financing

2.1 Economic Benefit

- Grouse moors are managed largely through the private investment of their owners, and they offer the most cost-effective model of upland management for the taxpayer.
- With the right conditions and management, grouse populations can flourish and produce a sufficient stock of birds for shooting to take place. It is the sale of grouse shooting that helps fund the work of the gamekeepers which protects the unique upland habitat and the wildlife it supports.

- For many upland areas shooting also plays a central role in the local economy. According to figures provided by the Moorland Association, it is estimated that grouse shooting in England creates 42,500 workdays a year, and over 1,500 full-time jobs, of which 700 jobs are directly involved with grouse moor management, and a further 820 jobs in related services and industries. Research has also shown that a wide range of rural businesses benefit financially from grouse shooting. These include game dealers, accommodation providers, equipment suppliers, catering establishments and transport operators, many of whom are often based in our most remote rural locations and for whom shooting can be the main economic driver.

2.2 Grants and Subsidies

- Opponents of grouse shooting have falsely claimed that grouse shooting has received public subsidy under the system of European subsidies. Under neither the old EU system nor the new post Brexit arrangements has any money been received to subsidise the activity of driven grouse shooting.
- Under the old EU arrangements payments were for farming activities and therefore only grouse moors that are farmed were eligible to receive funding under the Common Agricultural Policy. Any payments were provided to support the farming activity and not the shooting activity.
- Following Brexit, the new arrangements, such as Environmental Land Management Schemes, are based on the principle of public money for public goods. These schemes will be open to all those who own land and deliver public goods. If land management undertaken on grouse moors delivers public goods, then that can be recognised under the new system. Grouse shooting is not itself a qualifying public good. The fact that land on which grouse shooting takes place may be eligible is recognition that the moorland management associated with grouse shooting can, and does, deliver recognised public goods. It is further evidence of the importance of grouse shooting to the upland environment and its communities.

3.0 Human and Environmental Health

3.1 Lead Ammunition

- Lead is a toxin and there are potential environmental and human health risks from using it in ammunition. Restrictions on the use of lead shot are already in place across the UK to address proven environmental concerns about the impact of lead shot on waterbirds. [The Environmental Protection \(Restriction on Use of Lead Shot\) \(England\) Regulations 1999](#), amended [2002](#) and [2003](#), prohibits the use of lead shot for all wildfowl, with further restrictions below the high water mark of ordinary spring tides, and over specific SSSIs. Similar restrictions on lead ammunition are in place in Northern Ireland, Scotland, and Wales.
- The government is still to respond to the Health and Safety Executive's (HSE) proposals on restricting lead in ammunition, and its recommendation that lead shot should be banned in all shotgun ammunition with a five-year transition and that lead should be prohibited for all rifle ammunition for live quarry shooting of calibre .243 and above with a three-year transition. However, the EU Commission has recently published its proposals having rejected the recommendations of its agency for a five-year transition for lead in shotgun cartridge, instead suggesting that a ban on lead shot for hunting should be introduced in three years. The UK process for introducing restrictions has run alongside that of the EU since Brexit so it is possible that the government will take the view that a

three-year transition is also sufficient for hunters in the UK as it has been judged in the EU.

- A ban on lead ammunition has been inevitable for many years, and the Alliance remains committed to promoting a full transition away from the use of lead shot, which is essential for the sustainability and reputation of game shooting. Thanks to a number of organisations with an interest in game shooting, including the Alliance, calling for a voluntary transition away from the use of lead shot for live quarry shooting using shotguns five years ago, many viable and affordable non-lead cartridges have now come to the market. There has also been rapid development of biodegradable wads, which are essential in keeping plastics out of the countryside. We continue to encourage all game shots to move to alternatives to lead shot with biodegradable wads as soon as they are able to do so.

3.2 Water Quality

- Approximately 70 per cent of the UK's drinking water comes from the uplands and all land managers, not just those responsible for grouse moors, need to be aware of the valuable role of the uplands in the hydrological cycle.
- The drainage of peatland with agricultural drains or 'grips' was once widespread in the uplands, and in the 1960s and 1970s successive governments offered farmers and landowners grants for draining their land; grants that were aimed at increasing agricultural productivity, not the number of grouse. However, subsequent research found that these drains continued to erode over time and the only way to reduce sediment run-off was to block them. Doing so could also help restore natural drainage patterns, encourage the revegetation of bare peat, slow the flow of water through the catchment area, and filter out discolouration in the water.
- Grouse moor managers, working in conjunction with government and other organisations, are actively working on a number of restoration projects which include revegetation of bare peat, the blocking of government-incentivised drains, rewetting the peat, the introduction of blanket bog species such as peat forming sphagnum moss which absorbs and filters the water, and both restoration burning and cutting – all of which are vital tools within the peatland restoration toolbox. The considerable amount of work that is being undertaken by grouse moor managers to maintain and restore peatland is helping to improve the ability of the uplands to store water and carbon, and should be recognised as playing a valuable role in improving water quality.

3.3 Social Well Being

- Grouse shooting brings the rural community together in areas that can struggle with social isolation and lack of employment. In addition to those shooting, a day's driven grouse shooting also involves a large number of participants, bringing together up to 50 or so members of the local community of all ages and backgrounds. In August 2020, the Institute for Social Innovation and Impact at the University of Northampton published a new study into the social and economic effects of grouse shooting in English moorland communities. The study found that grouse shooting is part of a complex web of integrated moorland management practices. The study makes clear that it is the activities associated with grouse shooting that underpins not just the positive economic benefits that are brought to local upland communities, but also the social benefits.

4.0 Legislation and Controls

4.1 Existing Restrictions

- Grouse shooting is already heavily regulated and controlled. There is extensive legislation in place that has an impact on almost every aspect of grouse shooting and grouse moor management. This includes the possession and use of firearms, use of lead ammunition, the grouse season, methods of predator control, heather burning, use of medicated grit, and the protection of wild birds. Any additional legislation would need to be consistent, evidence-based and principled, recognising that further controls would add to the cost and bureaucracy of grouse moor management, without necessarily improving outcomes.
- Many of the existing laws in these areas involve licensing requirements, such as firearms possession, and heather burning in environmentally sensitive areas. This has given the UK Government, devolved administrations, and government agencies considerable control over grouse shooting. In England it is an offence to carry out burning on a SSSI unless a licence is obtained from Natural England. More than 60 percent of England's upland SSSIs are managed grouse moors.
- The grouse season is relatively short, as there is a closed season under The Game Act 1831 from 11 December to 11 August when it is not lawful to shoot grouse. In addition to the requirements of the 1831 Act, shooting will only take place when grouse numbers are at sustainable levels. Estates self-regulate by cancelling or reducing their shooting programs if grouse numbers are low, in order to maintain a healthy population.

4.2 A Ban on Shooting

- Being totally wild, the numbers of grouse can fluctuate dramatically from one year to the next, and from one part of the country to another. The habitat management and predator control undertaken by gamekeepers is essential, but even this is not enough to guarantee a sustainable surplus of grouse to allow shooting to take place, and when grouse numbers are low, shoot days may either be limited in number, or completely cancelled. It is important to note that management continues throughout the year regardless of whether shooting is possible in any given season.
- It is the sale of grouse shooting that helps fund the management that is undertaken and if driven grouse shooting was banned it would be economically unviable for estates to continue the full-time employment of gamekeepers. It is they who maintain the habitat and control predators which benefits threatened species of ground nesting birds such as curlew, lapwing and golden plover, which share the habitat to breed. The income from walked-up grouse shooting would be insufficient to cover the necessary costs.
- The only scientific study of wildlife populations undertaken after a driven grouse moor has ceased to operate, but where walked-up shooting continued, has been in Wales, and it showed dramatic declines of many threatened species. Welsh grouse moors were once the most successful in the UK, supporting an abundance of other wild birds. Since management for grouse shooting ceased, they went into serious decline. Studies in the [Berwyn](#) SPA show what can happen in just 20 years with golden plover declining by 90 per cent, curlew by 79 per cent, ring ouzel by 80 per cent, and black grouse by 78 per cent. Lapwing became locally extinct. Both curlew and lapwing are red-listed by the British Trust for Ornithology, and the curlew has been described by the RSPB as the UK's species of highest conservation priority.
- Anyone calling for a ban on driven grouse shooting needs to set out a viable, alternative vision for our uplands. Heather moorland in the UK is internationally important, and it is widely recognised that grouse shooting has helped preserve it. The International Union for the Conservation of Nature has identified the three dimensions to the core of mainstream sustainability as being environmental, social and economic. All three

dimensions need to be addressed by anyone looking at changing the status quo, and any alternative land use needs to be at least as beneficial as that currently in place.

- If people, both the public and governments, continue to value heather moorland landscapes, then they will need to be maintained. [Research](#) into the sustainability of driven grouse shooting published by the Institute for Social Innovation and Impact at the University of Northampton in August 2021 found that the current model of integrated moorland management, that includes driven grouse shooting as part of the economic and social mix, is a sustainable approach to maintaining such landscapes. Indeed, there was no evidence that any other management regime would deliver the same result.

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