

Defra Call for Evidence on Gamebird Release, Shooting and Welfare during Rearing in England

Guidance for Countryside Alliance members, supporters and shoot managers, with thanks to the GWCT.

The GWCT has been in dialogue with Defra to understand how best to respond to their Call for Evidence (found [here](#)). The GWCT will be submitting an independent, very thorough and detailed response which will include the most comprehensive list of peer-reviewed scientific evidence, research reports and papers. However, there is a real need for shoots, shoot owners, shoot managers and gamekeepers to respond to this Call for Evidence to provide data and evidence that the GWCT does not hold.

Defra has been quite clear that they recognise what good practice, sustainable game management looks like. Crucially they are aware that sustainable game management can deliver wildlife conservation and nature recovery, through the provision of habitat creation and management, supplementary feeding and predation management.

What is less clear to Defra is the scale and prevalence of good practice across England. This is a clear evidence gap they wish to address and this is where those involved in shoots can help.

Shoots, shoot owners, shoot managers and gamekeepers can provide much of this evidence of good practice when answering questions 8, 10, 16, 20, 23, 25, 28 and 29 in Section A of the Call for Evidence which is focussed on gamebird release and shooting. Of these, question 28 is of critical importance. **It is crucial that answers are honest and based on evidence or your experience. Any evidence you provide should be demonstrated with examples rather than just stated.** For example, reports, figures, diary entries, certificates and photographs could be provided. Our advice is to only address those issues with which you are familiar.

Below we provide details on what evidence could be included (especially for sub question 28e) for the key questions within the Call for Evidence.

Questions 1 – 6 are straight forward and relate directly to the respondent, their details, who they represent and whether they wish your response to be confidential.

Section A, questions 7 - 30 contain some key questions (8, 10, 16, 20, 23, 25, 28 and 29) on which GWCT provide specific guidance below. The other questions in Section A should be left blank unless respondents have the necessary expertise.

Section B, questions 31 – 106 relate to the welfare of gamebirds during rearing and GWCT is not best placed to offer advice on these. If you rear gamebirds and wish to

answer these questions please seek guidance from the Game Farmers Association ([GFA](#)) or your gamebird vet.

Section A – Key questions which respondents should answer:

Question 8: What evidence is there of positive and/or negative impacts from:

- a. grouse shooting;
- b. pheasant/partridge release and shooting;
- c. mallard release and shooting on biodiversity.
- d. and related activities.

- Individuals or shoots could refer Defra to GWCT peer-reviewed scientific evidence. In particular GWCT's new Game for Nature report (found [here](#)) which contains 39 key scientific papers, and GWCT's Gamebird Releasing and Management in the UK report (found [here](#)) which references over 140 scientific papers.

Question 10: What evidence is there that practices aligned with recognised regulatory requirements, industry codes or guidance increase the likelihood of positive outcomes and reduce the risk of negative outcomes for biodiversity?

- Individuals or shoots could refer Defra to GWCT peer-reviewed scientific evidence. In particular GWCT's new Game for Nature report (found [here](#)) which contains 39 key scientific papers, and GWCT's Gamebird Releasing and Management in the UK report (found [here](#)) which references over 140 scientific papers.

Question 16: What evidence exists of links between grouse shooting, pheasant/partridge release and shooting, and mallard shooting and the spread of disease, including Highly Pathogenic Avian Influenza (HPAI) and other infectious diseases?

- Individuals or shoots could provide **evidence of absence** of this issue from their own experience and records, for example it will be worth stating if no evidence of any links exists between their managed gamebirds and the spread of diseases such as HPAI at their local level.

Question 20: What evidence exists of links between gamebird activities and bird of prey crime?

- Individuals or shoots could provide **evidence of absence**, where their own evidence demonstrates that there is an absence of any links between gamebird activities and bird of prey crime at their local level.

Question 23: What evidence exists on whether, and how, compliance with relevant regulatory requirements, statutory or industry codes of practice, guidance, assurance schemes, or other recognised good practice improves welfare outcomes during and following release?

- Individuals or shoots could provide evidence on the welfare and quality of their gamebirds following release. They could make reference to the Code of Good Shooting Practice which they follow as a requisite part of their membership of a shooting organisation, the biosecurity measures they follow (e.g. [COGSP Avian Influenza biosecurity advice](#) or [BASC guidance](#)), and they could make reference to the following GWCT stocking guidelines found [here](#). Reference could also be made to the release pen scoring system used by gamebird vets found [here](#).

Question 25: What evidence exists on the number of birds shot and how many enter the food chain?

- Individuals or shoots could provide evidence of their own circumstances with regard to what use is made of shot game and how it enters the food chain. It is likely that the government underestimates the amount of game that is processed and eaten by shooters and shoot helpers. People who fall into this category could answer to that effect. It is perfectly legal for processing waste from personal consumption and any leftovers like bones to go into domestic food waste. Commercial processors need a dedicated waste stream from either a registered waste disposal company or by approved incineration.

Question 28: What evidence exists of links between gamebird activities and:

a. use of lead shot;

- Individuals or shoots could answer whether they use lead shot. If they do not use lead shot, when did they introduce this policy. What policies do their shoot put in place to adhere to existing legislation such as The Environmental Protection (Restriction on Use of Lead Shot) (England) Regulations 1999.

b. misuse of medicated products;

- Individuals or shoots could provide **evidence of absence**, where their own evidence demonstrates that there is an absence of misuse i.e., the shoot in question wishes to provide evidence of good practice and has veterinary records demonstrating correct use of medicated products.

c. antimicrobial resistance;

- Individuals or shoots could provide **evidence of absence**, where their own evidence from veterinary records demonstrates best practice and an absence of antimicrobial resistance.

d. misuse of pesticides;

- Individuals or shoots could provide **evidence of absence**, where their own evidence demonstrates that there is an absence of misuse, i.e. the shoot in question wishes to provide evidence of good practice and has records (certificates of competence etc) demonstrating correct use of pesticides.

e. other environmental or social impacts.

- Individuals or shoots could provide **evidence** such as:
 - Adherence to GWCT release pen stocking densities found [here](#), including evidencing the number of birds released and the number and size of pens into which birds are released.
 - Adherence to current legislation such as The Kept Bird Register found [here](#).
 - Data or survey results evidencing how their shoot benefits Birds of Conservation Concern (red or amber listed birds for which the list can be found [here](#)), farmland songbirds, waders or birds of prey. This could include independent reports, annual counts, diary accounts as necessary and shoot specific conservation projects.
 - Management plans, agreements, reports, maps or photographs which evidence how much habitat has been maintained or created. This could be hectares/ acres of woodland, hedgerows, cover crops, wetlands or moorland.
 - Participation in schemes such as the National Gamebag Census (NGC) found [here](#).
 - Membership of an assurance scheme such as Trusted Game found [here](#).
 - Participation and involvement in surveys and counts such as GWCT's Big Farmland Bird Count found [here](#), or the BTO's Breeding Bird Survey found [here](#).
 - Reports of involvement with GWCT's advisory service and any Biodiversity Assessments which have been undertaken.
 - Use of the GWCT's free online shoot biodiversity calculator found [here](#).
 - Certificates of sector relevant qualifications such as GWCT's predation management courses or GWCT's BASIS certificate in Game Management.

- Examples of the social impacts of the shoot such as the number of individuals involved in shoot days, work parties and other community events throughout the year.

Question 29: Are there any additional positive or negative impacts, not covered above, for example recreational benefits?

- Individuals or shoots are free to provide additional examples not covered in question 28. For example, the benefits of being involved in a rural community and the social, mental and physical benefits of being involved in a rural, recreational activity. The number of individuals involved in your shoot, their age brackets and gender, and its importance for those who help on the shoot of casual work. If you have your shoot lunch in the pub, how much is spent there across the season. The amount you spend as part of your shoot/shooting budget on clothing, cartridges, vehicles and fuel, food and drink, hotel accommodation, gifts, gundog feed and services (e.g. vet and training), charity donations, etc each year.

It is also important to recognise that this is a Call for Evidence, and not opinions, so whatever is said needs to be factual, not merely assertive. As far as possible, it also needs to be provided with extra detail where this is available. Please proceed with caution, and only address issues with which you are familiar.

As an alternative to filling out the Defra form, it is also possible to write your response in the form of an email to Defra Gamebirds@defra.gov.uk (Please include "Call for Evidence" in the subject line).

If help is needed with any of the above, or if there are any questions, the GWCT advisory team can help. Please contact Lizzie Herring via email to lherring@gwct.org.uk with the subject "DEFRA Call for Evidence Help" and one of the advisory team will respond to your query.