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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 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, and licensing requirements are in place across many areas such as firearms possession, and heather burning in environmentally sensitive areas. Any additional legislation, or licensing requirements, 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.

- 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.
- 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, and often required, 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.
- 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.
- Improvements in grouse moor management continue to be made on the basis of evidence and principle, with stakeholders working together.

1.0 Moorland Management

1.1 Heather Burning

- Grouse moor management involves the controlled burning of heather on small areas of shallow peat in order to increase the diversity of heather age and structure. Burning takes place on a rotational basis, the frequency of which is dependent on the speed at which heather grows in a particular area, and becomes dominant. This ensures that there is a mixture of older heather for protection and nesting, younger heather for feeding, and a fresh burn where regrowth is just starting. It also encourages the growth of peat forming sphagnum moss which filters and absorbs water. The aim is to create lots of micro habitats so that within one acre of moorland the widest possible range of biodiversity, from insects to reptiles, and mammals to birds, have the full range of habitats they require. 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. Although the cutting of heather may be a viable alternative to burning in some areas, this is not the case everywhere, and its possible impacts are still to be determined. An independent review of all the available science is required before it can be put forward as a sustainable alternative.

- The statutory Code of Practice for heather burning, [The Heather and Grass Burning Code](#) (Defra, 2007), which was developed in association 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 states that burning can only take place during the 'burning season' which runs from 1 October – 15 April in upland areas (severely disadvantaged areas), when the roots are at their wettest to avoid a hot burn that can otherwise enter the peat. In order to burn in [environmentally protected areas](#), such as a Site of Special Scientific Interest (SSSI), consent is required from Natural England, and there are strict limits on the amount of heather than can be burned at any one time. More than 60 per cent of English grouse moors are designated as SSSI. A licence is also required to burn in sensitive locations such as on a slope or near a watercourse.
- Controlled, rotational burning can help reduce the risk of damaging wildfires and the carbon loss caused by these. Large stands of rank and woody heather pose a major fire risk due to a significant build-up of fuel loads. Uncontrolled wildfires cause considerable environmental damage as they burn with greater intensity, burn the peat beneath the vegetation, and prevent peatland from storing water and carbon. This view is supported by research into [Heather Burning](#) by the Game and Wildlife Conservation Trust.
- 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 fire fighters from seven counties to fight the blaze, assisted by gamekeepers, wardens from the Peak District National Park, National Trust and RSPB, as well soldiers, farmers and other volunteers. Those gamekeepers, who came from nine shooting estates from across the Peak District, were able to provide much-needed experience and specialist fire-fighting 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, as a result of the moorland becoming overgrown, likewise resulted in over 22 square miles of this UNESCO world heritage site being severely damaged, with 700,000 tonnes of CO2 equivalent released into the atmosphere, doubling the country's greenhouse gas emissions for the six days it burned. An exercise undertaken by Scottish Natural Heritage and the Scottish Fire and Rescue Service (SFRS) in 2018 also showed that the correlation between the number of wildfires that the SFRS are called out to and heather burning is extremely low. Out of a total of 153 fires, only four were in areas of moorland managed for grouse, and none were during the burning season. All were due to accident or arson.
- The debate over the use of controlled heather burning continues to be polarised, with opposition to the long-established practice often citing 'science'. That science is now

nearly a decade old. A review of research from 2013 - 2020 carried out by respected scientists has found that the conclusions of the previous science are out of date and cannot be regarded as a safe basis for policy decision-making today.

- The Uplands Partnership, which comprises leading countryside organisations, including the Countryside Alliance, has produced [Peatland Protection: The Science, four key reports](#), which collates the latest scientific findings. This dossier is highly significant in that it strongly recommends that any policy discussions should take cognisance of the latest research. In summary the findings indicate that:
 - Heather burning can have a positive effect on carbon capture.
 - Burning does not cause water discolouration.
 - Environmentally important Sphagnum moss recovers quickly from low severity 'cool' burning.
 - The loss of controlled burning in the USA led to declines in bird life and an increase in damaging wildfires.
 - Greenhouse gas emissions from controlled burning are relatively insignificant compared to emissions from wildfire, or indeed severely degraded lowland peatlands used for agriculture.
- 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 new regulations, which come into force on 01 May 2021, will prevent the burning of any specified vegetation 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. However, the prohibition does not apply if the area of specified vegetation to be burned in one burning season is an area which has a slope of more than 35 degrees; or where more than half of that area is covered by exposed rock or scree, and in either case it 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.
- The Government has recognised that if moorland is unmanaged, there is a risk of wildfire which can cause significant damage by burning the peat, and that the possibility of these have grown due to climate change. The new regulations therefore allow a person to apply to the Secretary of State for a licence permitting the burning of specified vegetation on blanket bog that would otherwise be prohibited, and this may be granted where it is either beneficial or necessary for: the conservation, enhancement or management of the natural environment for the benefit of present and future generations; the safety of any person; to reduce the risk of wildfire; or because the specified vegetation is inaccessible to mechanical cutting equipment and any other method of management is impracticable.
- Although the Alliance did not believe legislation was necessary to protect blanket bog habitats, we are delighted that Defra has listened to evidence, and recognises the

important role that controlled burning has to play both in preventing wildfires and for conservation, where other practices are not possible.

1.2 Peatland Restoration

- 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." Around 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.

1.3 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 successfully raise chicks. 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.
- 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 snares, is particularly important. Well-designed snares, used properly, are a humane and effective form of predator control and the Defra-endorsed code of best practice contains more information about their lawful use in England.

1.4 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. Any person who breaks the law commits an offence and is liable to a level 5 fine on the standard scale and/or five years imprisonment.
- 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, confirmed cases are decreasing year on year, and only 12% of those convicted of wild bird related prosecutions over the last decade have been gamekeepers. However, 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 McMorn 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, includes a trial brood management scheme for hen harriers that provides 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 the Hawk & Owl Trust has been able to fill any gap in the expertise that might otherwise have resulted from the RSPB's departure. Additionally, we welcome [Operation Owl](#), and its work to further minimize any illegal raptor persecution.
- Any consideration of birds of prey should take account of historical trends in population numbers. 100 years ago there were no hen harriers on mainland UK, and the [latest hen harrier survey](#) revealed a UK population of 545 territorial pairs in 2016, a drop of 88 pairs since the last national survey in 2010. Internationally they are resident in 87 countries across the northern hemisphere with a population of 1.3 million. In 1963 there were 360 pairs of peregrines in the UK, today there are 1750. Over the past 20 years breeding pairs of red kites have increased from 160 to 4,400, and pairs of buzzards from 14,500 to 75,250 ([Avian Population Estimates Panel 2020](#)).

- Although Natural England's report into [A Future for the Hen Harrier in England](#) identified six causes of hen harrier nest failure: wildfire, predation, lack of food, poor weather, infertility and illegal killing, the decline in hen harriers is frequently attributed to illegal killing alone. However, new data on the cyclical nature of breeding in England, and the decline in breeding numbers across areas with no shooting interests, show that the situation is not so easily explained. Using figures provided by Natural England, [we have produced a table](#) which shows a clear cyclical nature for hen harrier breeding success in England over the 35 year period from 1986 - 2020. The number of breeding attempts, successful nests, and number of chicks fledged during each of those years, and the peaks and lows, show a distinct pattern. As illegal killing does not tend to be cyclical, other factors must be contributing to this. This table also shows that since the introduction of Defra's trial brood management scheme in 2018, 141 hen harrier chicks have successfully fledged, the highest figure for any three-year period since 1986. This year, the 19 successful nests were spread across Northumberland, Yorkshire Dales, Cumbria and Lancashire, with a total of 60 chicks being fledged from those. 12 of the 19 successful nests were on land managed for grouse shooting.
- 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 culled 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. These skills were once passed from father to son but the modern gamekeeper is expected, and often required by their employers, to undertake formal apprenticeships or college courses, gain practical qualifications, or attend best-practice courses on subjects such as snaring, 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 to 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. Grouse moor owners in England spend approximately £52.5 million every year on moorland management, equal to £1 million every week.

- For many upland areas shooting also plays a central role in the local economy. [A recent report by PACEC](#) estimated that grouse shooting in England creates 42,500 work days 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 associated spin-offs from grouse shooting in the North of England are worth in excess of £15 million a year, which benefits a wide range of rural businesses. 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. However, only grouse moors that are farmed were eligible to receive funding from the European Union's Common Agricultural Policy (CAP), with rural payments being provided to support the farming activity that takes place on these moors, not the shooting activity. Farmers and land managers could apply for support payments under the [Basic Payment Scheme \(BPS\)](#) which is Pillar 1 of the CAP funding. Only agricultural land is eligible for BPS payments.
- The Rural Payments Agency, which administered the BPS in England, stated in its guidelines that moorland used primarily for shooting purposes is not eligible for BPS payments and there was also an 'active farmer' test for claimants, along with a range of other criteria to prove that the land was in agricultural use. Similar conditions applied for support payments administered by the devolved administrations.
- The primary land use on many moors managed for grouse shooting is low intensity grazing, often leased to a tenant farmer, and it is farming which benefited from BPS payments, not grouse shooting. Farming that takes place on moorland was usually eligible for the lowest category of BPS payment, known as 'Upland (Severely Disadvantaged Areas) Moorland'.
- Some moors also received grants through [Countryside Stewardship Schemes \(CSS\)](#) or [Higher Level Stewardship \(HLS\)](#) under Pillar 2 of CAP funding, which provided funding to enable farmers and land managers to farm in a way that supports biodiversity, enhances the landscape, and improves the quality of water, air and soil. The fact that many moors used for grouse shooting were eligible for these schemes shows how grouse moor management benefits conservation and habitat management. Funding under these schemes was often provided in the form of capital grants for particular projects such as woodland improvement and river management. It did not directly benefit grouse shooting.
- All farmers and land managers who claimed funding under the BPS or CSS, whether on moorland or any other type of agricultural land, were bound to follow [cross compliance rules](#). These rules included minimising soil erosion, keeping public rights of way accessible, preserving habitats and species, and protecting water sources.
- Following the end of the Transition Period on 31 December 2020 the UK has begun the process of moving away from the EU system of grants and subsidies for agriculture to a

new system of Environmental Land Managements Schemes (ELMs) based on the principle of public money for public goods. These schemes and the payments for public goods will be open to all those who own land and deliver public goods. Under neither the old EU system nor the new post Brexit system can public money be spent to subsidise the activity of driven grouse shooting. However, the fact that land management activities associated with moorland management for grouse shooting deliver recognised public goods 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.
- In consideration of wildlife, the environment and to ensure a market for the healthiest game products both at home and abroad, the Countryside Alliance, alongside all other leading countryside organisations, wish to see an end both to lead and single-use plastics in ammunition for all live quarry shooting with shotguns by 2025. The shooting community must maintain its place at the forefront of wildlife conservation and protection, and sustainability in our practices is of the utmost importance.
- Many years ago, wetland restrictions demanded a move away from lead shot and we believe it is necessary to begin a further phased transition. Recently, there have been significant developments in the quality and availability of non-lead shotgun cartridges, and plastic cases can now be recycled. For the first time, biodegradable shot cups for steel shot, with the necessary ballistics to ensure lethality, are available. These welcome advances are continuing at an ever-quickening pace, in response to demand from a changing market. Such advances mean that, over the coming years, a complete transition is achievable.
- We are jointly calling for our members to engage in this transition, and to work with us, the Gun Trade Association and the cartridge manufacturers to ensure that further viable alternatives are developed for every situation involving the shooting of live quarry with shotguns. This is an opportunity to take the initiative, and ensure the reputation of the shooting community, as custodians of the countryside, is both maintained and enhanced.

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. The Institute for Social Innovation and Impact at the University of Northampton recently 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

- The petition in question only calls for a ban on driven grouse shooting rather than any other form of grouse shooting (i.e. walked-up or over pointers/setters). It is hard to imagine how such a distinction could be legislated for or enforced.
- 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.
- Although walked-up grouse shooting requires lower densities of grouse than driven shooting, it would not be an economically viable alternative to driven grouse shooting if estates are 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 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.

- Those calling for a ban on driven grouse shooting need to set out a viable, alternative vision for our uplands, considering that 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 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.

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