

**COUNTRYSIDE ALLIANCE WRITTEN EVIDENCE**

**PETITIONS COMMITTEE INQUIRY INTO**

**GROUSE SHOOTING**

**October 2016**

**Executive Summary**

* The Countryside Alliance is a membership-based organisation that works for everyone who loves the countryside and the rural way of life. We welcome this inquiry and the opportunity to submit evidence on grouse shooting and grouse moor management, particularly its benefits for wildlife, the environment and upland communities.
* 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.
* The theory and practice of modern gamekeeping is centred on conservation and a respect for biodiversity. Modern gamekeepers are increasingly expected, and often required, to undertake formal apprenticeships or college courses, gain practical qualifications, and attend best-practice courses.
* Grouse moor management has played a key role in creating and maintaining our upland landscape, preserving heather habitat and peatland, sustaining some of our rarest plants and wildlife, and promoting biodiversity.
* 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.

**Introduction**

1. The Countryside Alliance is a membership-based organisation that works for everyone who loves the countryside and the rural way of life. Our aim is to protect and promote life in the countryside and to help it thrive. With over 100,000 members we are the only rural organisation working across such a broad range of issues.
2. The Countryside Alliance understands that this inquiry has been established to gather evidence ahead of a Westminster Hall Debate on grouse shooting. We understand that written evidence submitted to this inquiry will not be used to draft a report with recommendations and will primarily be used to inform the oral evidence session on Tuesday 18 October.
3. The Countryside Alliance welcomes this inquiry and the opportunity to submit evidence on grouse shooting and grouse moor management, particularly its benefits for wildlife, the environment and upland communities.

**Q. 1 Should the law on grouse shooting be changed? If so, how?**

1. 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 (set out below).
2. Many of the existing laws in these areas involve licensing requirements, such as firearms possession and heather burning in environmentally sensitive areas, which has given the UK Government, devolved administrations, and government agencies considerable control over grouse shooting.
3. 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.

***Firearms***

1. The UK has some of the strictest firearms laws in the world. The legal requirements for the lawful use and possession of firearms are principally contained in the Firearms Act 1968 but there are an additional 33 Acts of Parliament that also apply, without including secondary legislation.
2. The 1968 Act restricts the use of firearms to those possessing the required Firearm or Shotgun Certificate. It ensures that shooting is restricted to those of sound mind, who do not represent a risk to public safety or to the peace. It requires, amongst other things, guns to be sleeved in public places, restricts shooting near highways, footpaths and buildings, and makes it an offence to be drunk in possession of a loaded firearm.

***Lead Ammunition***

1. The UK Government, in consultation with the Food Standards Agency and other stakeholders, concluded in July 2016 that there was no need to change the existing legislation on lead ammunition following the Report from the Lead Ammunition Group in June 2015. The existing legislation was introduced in response to international agreements (AEWA and CMS) to which the UK is a signatory party. These agreements reflect proven environmental concerns about the impact of lead shot on waterbirds and have been implemented into law.
2. In England and Wales, the legislation 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. In Scotland and Northern Ireland, the legislation prohibits the use of lead shot on or over any area of wetland for any shooting activity.

***The Grouse Season***

1. 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.

***Predator Control (snares)***

1. It has been illegal to use self-locking snares in all parts of the UK since the introduction of the Wildlife and Countryside Act 1981and the Wildlife Order (Northern Ireland) 1985. Free-running snares are permitted on account of their effectiveness and humaneness but must be checked daily when set. Animals held in free-running snares are protected by the Animal Welfare Act 2006.
2. A new Code of Practice on the use of snares for fox control has recently been published in England. The new Code, which has been approved by Defra, follows the example set by the Welsh Government, by incorporating the latest research on snaring practices and technological developments on snare design. It will help deliver higher animal welfare standards, improve efficiency in fox control, whilst minimising the risk to non-target species.

***Heather Burning***

1. The Heather and Grass Burning (England) Regulations 2007 apply to the burning of heather, grass, bracken, gorse and vaccinium and this has been transposed into the Heather and Grass Burning Code. Burning is only permitted in upland areas from 1 October to 15 April and the Code prohibits various types of burning which may create a high risk of soil exposure and erosion, unless under licence from Natural England. Any person who contravenes theregulations commits an offence and isliable to a level 3 fine on the standard scale. Similar regulations and codes are in place in Scotland and Wales.
2. In addition to the 2007 Regulations, there are 28 other Acts of Parliament that apply to burning. These include Section 28 of the Wildlife and Countryside Act 1981 which makes it an offence to carry out burning on a SSSI unless a licence is obtained from Natural England. More than 70 percent of England’s upland SSSIs are managed grouse moors so this requirement applies in most cases.

***Medicated Grit***

1. The use of medicated grit to help reduce the impact of the stronglye worm on grouse is only available under a veterinary prescription as set out in the Veterinary Medicines Regulations 2013. Evidence of high strongyle worm presence in the grouse population is required by a veterinarian before the appropriate prescription can be dispensed.
2. There is a statutory requirement to withdraw all medicated grit 28 days before the start of the grouse shooting season, and keep it withdrawn throughout the season. The Veterinary Medicines Directorate has the responsibility for monitoring this and samples of red grouse will be taken as part of the 2016 programme of testing.

***Protection of Wild Birds***

1. The UK has some of the most robust wildlife and animal welfare legislation in the world. 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 and Habitats Directives.
2. The 1981 Act protects all wild birds and states that they cannot be killed or taken except in certain circumstances, such as during the open seasons for game species, or under the authority of a General Licence, or Individual Licence for Schedule 1 birds. The 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 isliable to a level 5 fine on the standard scale and/or six months imprisonment.
3. Licences for lethal control are heavily conditioned as to how the activities that they permit must be carried out, for example in relation to the inspection of cage traps. Any form of lethal control that is indiscriminate or cruel is prohibited.

**Q. 2 What effect does grouse shooting have on wildlife and the environment?**

1. Grouse moor management has played a key role in creating and maintaining our upland landscape, preserving heather habitat and peatland, sustaining some of our rarest plants and wildlife, and promoting biodiversity. It is because of their management for grouse shooting that more than 70 percent of England’s upland Sites of Special Scientific Interest are managed grouse moors, and over 40 percent are also designated as Special Protection Areas for rare birds and Special Areas of Conservation for rare vegetation under the EU Habitats Directive. These environmental designations mean that many management practices are restricted and subject to licensing by Natural England.
2. Heather moorland is rarer than tropical rainforest and threatened globally, with 75 percent of remaining habitat found in Britain. Red grouse are unique to the UK and depend almost entirely on heather moorland. Grouse moor managers understand that a healthy population of grouse relies upon a healthy heather habitat.
3. Part of grouse moor management involves controlled heather burning. Burning takes place in patches on a rotational basis, the frequency of which is dependent on the speed at which heather grows in a particular area. 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. The aim is to create lots of micro habitats so that within one acre of moorland red grouse and other ground nesting birds, such as curlew, lapwing and golden plover, have the full range of habitat they require. Controlled heather burning does not involve burning the peat beneath the vegetation, and great care is taken to avoid this, not least because burning the peat would delay the regrowth of the heather.
4. The Ember Project, a research project undertaken by the University of Leeds (Brown, Holden and Palmer, 2014), collated evidence relating to the environmental impact of heather burning, and how fire can effect various aspects of the upland ecosystem, with a specific emphasis on burning on peatlands. What the Ember Project did not consider was the impact if burning was stopped, including the impact this would have on wildlife and biodiversity. Controlled burning, carried out in accordance with Natural England’s Heather and Grass Burning Code, can significantly reduce the risk of uncontrolled wildfires and help prevent their detrimental impact on wildlife and the environment.
5. A Natural England Evidence Review into The Effects of Managed Burning on Upland Peatland Biodiversity, Carbon and Water (Natural England, 2013) concluded that there was strong evidence that controlled heather burning and predator control correlated with higher densities of red grouse, golden plover, curlew, lapwing, redshank and ring ouzel.
6. 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. This practice has since been discredited on account of the damage it causes to the peatland. 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 sphagnum moss which slows the flow of surface water and filters out discolouration.
7. Peat Restoration Partnerships have proved highly effective and are an example of stakeholders working together to restore peatland. Recent data produced by Natural England reveals that some 44,500 acres of moorland has been repaired and revegetated across the North of England, all on land managed for grouse shooting. 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.
8. There is no proven link between grouse moor management and flooding. What is clear, is that the concerted efforts of grouse moor managers to re-vegetate bare peat, and block agricultural drains to raise water tables across the uplands, contributes to slowing the flow of water through a catchment area. This work should be seen as part of any flood prevention strategy rather than a causal factor.
9. In addition to preserving heather habitat and peatland, grouse moor managers play a vital role in controlling invasive species. Over the past ten years grouse moor managers in England have treated approximately 65 square miles of invasive bracken to stop it swamping and killing other moorland plants and providing a breeding ground for ticks. Seasonal workers employed during the shooting season also help with vital conservation work such as spraying ragwort and removing tree saplings on the lower ground of the moor to prevent forest encroachment. This labour intensive work is carried out because grouse shooting provides a financial incentive to conserve our upland landscape despite economic pressures and the attractiveness of government subsidies for other activities such as forestry and farming.
10. In areas where grouse moor management has stopped, biodiversity has suffered. Welsh moors were once the most successful grouse moors in the UK supporting an abundance of other wild birds. Since management for driven grouse shooting ceased, they have gone into serious decline. Studies on a former grouse moor in Berwyn show what can happen in just 20 years withlapwing becoming extinct, golden plover declining by 90 percent, curlew by 79 percent, and ring ouzel and black grouse by 78 percent. (Warren & Baines, 2014). With the exception of golden plover, all of those species are red-listed by the British Trust for Ornithology as being of the highest conservation concern.
11. 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 increasingly expected, and often required, to undertake formal apprenticeships or college courses, gain practical qualifications, and attend best-practice courses.
12. The illegal persecution of birds of prey can never be justified, and any incident of illegal persecution is one too many. More can be done to help red-listed species such as the hen harrier but the best results are often achieved through stakeholders voluntarily working together. The Countryside Alliance fully supports Defra’s Joint Hen Harrier Recovery Plan, which until recently also had the support of the RSPB.
13. 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, today there are around 645 breeding pairs across the country, and 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 1500. Over the past 20 years breeding pairs of red kites have increased from 160 to 1600, and pairs of buzzards from 14,500 to 68,000 (Avian Populations Estimate Panel (Stone et al., 1997), (Baker et al., 2006) and (Musgrave et al., 2013)). In most cases, the success or otherwise of birds of prey is related to weather conditions, availability of food, and presence of predators.
14. 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 crow, a common predator species culled on most grouse moors, increased four-fold following the end of gamekeeper management. To maintain their population, the ground-nesting hen harrier needed the gamekeeper just as much as the red grouse.

**Q. 3 What role does grouse shooting play in rural life, especially the rural economy?**

1. Grouse moors are sustainably managed, largely through the private investment of their owners, and they offer the most cost effective model of upland management to the tax payer. This management produces landscapes everyone can enjoy and which are some of the rarest, most important and most iconic in the world.
2. A recent survey undertaken by the Campaign for National Parks highlighted how popular shooting is within National Parks, both with residents and visitors. Shooting was second in popularity to ‘walking’ among visitors, and third to ‘walking and observing wildlife’ among residents. Well managed grouse shooting in the uplands provides stunning landscapes and increases the amount of wildlife to be seen, so shooting is supporting the favourite activities of those who shoot and those who do not.
3. Grouse shooting is an essential part of managing, maintaining and protecting our rare upland landscape. For many upland areas, grouse shooting also plays a pivotal role in the local economy, providing a valuable source of jobs from gamekeepers and game dealers to accommodation and catering providers.
4. A report by PACEC estimated that grouse shooting in England creates 42,500 work days a year, and the equivalent of over 2,500 full-time jobs across the UK (PACEC, 2014). In England, 700 jobs are directly involved with grouse moor management and a further 820 jobs are in related services and industries (PACEC, 2014).
5. Grouse shooting is worth in excess of £100 million across the UK, investment which benefits a wide range of rural businesses (PACEC, 2014). This includes game dealers, accommodation providers, equipment suppliers, catering establishments and transport operators, many of whom are based in the most remote rural locations and shooting is often the key to their economic viability.
6. Grouse shooting underpins the social life of many upland communities and helps tackle rural isolation. In addition to the people shooting, a day’s grouse shooting involves a large number of participants, bringing together up to 50 members of the local community of all ages and backgrounds. These include beaters, pickers-up, flankers, loaders and catering staff. Beaters are often local students or school leavers looking for additional income, or retirees with decades of experience of the countryside.