

Emma Marsh MAPM FRSA  
Director, RSPB England  
First Floor  
One Cornwall Street  
Birmingham  
B3 2JN

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Dear Emma,

APPOINTMENT OF RSPB CONSERVATION ADVISOR (UPLAND SHOOTING ESTATES)

Thank you for your email of 5 April introducing Paul Jackson, the RSPB's new Conservation Advisor for Upland Shooting Estates in England, and for the additional details contained in your accompanying letter. I am delighted the RSPB acknowledges the many examples of good conservation practice on upland shooting estates, and wants to feed these into the development and refinement of its policies. I also applaud your wish to work with the shooting industry to build relationships, recognise existing good practice, and help provide a forum to discuss issues in a collaborative way. These words, however, are contradicted by the RSPB's actions, and its determination to attack driven grouse shooting and its associated land management practices at every opportunity.

You mention that the appointment of Conservation Advisor was made following the publication of the RSPB's Gamebird Shooting Review in 2020. It would appear that you are unaware that the Countryside Alliance, along with eight other leading organisations representing shooting and landowning interests in the UK, submitted a joint response to that Review in April 2020, in which it was pointed out that the Game and Wildlife Conservation Trust (GWCT) had produced a set of principles for best practice game management in the UK which, unlike the RSPB's 'draft' principles, we all supported. The GWCT's principles were based on accepted international principles which are compatible with the objectives of the major environmental treaties, and they maximise the benefits to the environment and economy arising from sustainable gamebird management. The RSPB's principles, on the other hand, go far beyond those recognised internationally, and were clearly intended to lead respondents to agree to a framework for the licensing of all shooting activities in the UK, and a significant restriction on sustainable use.

As I am sure you are aware, we also have major issues with a number of the RSPB's policy positions, including the ending of burning vegetation on peatlands. The Uplands Partnership, of which the Alliance is a member, commissioned a review of research into the use of controlled heather burning as a key element of moorland management, which was published in 2020. This found 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; and greenhouse gas emissions from controlled burning are relatively insignificant compared to emissions from wildfire, or indeed severely degraded lowland peatlands used for agriculture. Recent research undertaken by the University of Cambridge reinforces the importance of controlled burning. The possibility of wildfires has grown due to climate change, yet despite all the evidence the RSPB is

wanting to stop an essential management practice that can help both prevent and reduce their devastating impact.

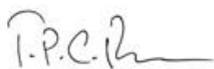
Grouse shooting is already heavily regulated and controlled. There is extensive legislation in place that has an impact on almost every aspect of grouse shooting and grouse moor management, and many of the existing laws also involve licensing requirements. This has given the UK Government, devolved administrations, and government agencies considerable control over grouse shooting, and the RSPB's calls for the licensing of grouse moors is therefore unnecessary.

Ending the use of lead ammunition and the illegal persecution of birds of prey were two other policies highlighted in the RSPB's Gamebird Shooting Review, both of which are areas in which the shooting sector were already ahead of the curve. In January 2020 we issued a joint statement condemning all illegal killing of raptors, our having zero tolerance towards all incidents. And in February 2020 we, along with all the UK's other leading rural organisations, called for a voluntary phase out of lead shot and single use plastics for live quarry shooting with shotguns by 2025.

The RSPB's positioning regarding improving the conservation status of the hen harrier in England is also concerning. Since Natural England issued its first licence for brood management in 2018, the increase in the number of hen harrier chicks fledged has been dramatic. Last year was the best for hen harrier breeding success in England since the 1960s, with 84 chicks fledged from 24 successful nests spread across uplands in County Durham, Cumbria, Lancashire, Northumberland and Yorkshire. Of those 24 nests, 19 (79%) were on moorland managed for grouse shooting. This is the fifth successive year of increases, following a low of only 8 chicks in 2016 when Defra launched its Hen Harrier Action Plan. Yet, the RSPB has withdrawn from the Action Plan, refused to support it and, indeed, spent hundreds of thousands of pounds of charitable funds on a Judicial Review into the trial brood management scheme. The evidence increasingly suggests that the RSPB does not actually want more hen harriers in England as confirmed by correspondence obtained by the Countryside Alliance under the Freedom of Information Act which revealed how the RSPB prevented the reintroduction of hen harriers to the South of England in 2019. To intentionally de-rail this government led project, and the underhand way in which it was done, raises enormous questions about the RSPB's priorities, and there are many people who are deeply concerned at the way in which the charity is driving an agenda that is undermining the efforts not just of government, but also the many other organisations that are working to improve the conservation status of hen harriers in the UK.

When it comes to the management of grouse moors, we rely on the expertise of those on the ground. The RSPB's upland managers could also benefit from that expertise when it comes to conservation and land management. The work carried out by moorland keepers has resulted in a landscape of global importance, and one that they are continually enhancing. Over 45,000 acres of moorland have been repaired and revegetated on land managed for driven grouse shooting, and they have blocked over 7,000km of drainage ditches to re-wet the peat. Working alongside highly qualified land agents employed by the estates, they are actively involved in the management and conservation projects mentioned in your letter.

Yours sincerely,



Tim Bonner  
Chief Executive

T 01233 555 662  
E [info@countryside-alliance.org](mailto:info@countryside-alliance.org)  
W [www.countryside-alliance.org](http://www.countryside-alliance.org)

Tintagel House  
92 Albert Embankment  
London SE1 7TY