

## COUNTRYSIDE ALLIANCE BRIEFING NOTE



The Voice of the Countryside

### GROUSE SHOOTING - 10 KEY QUESTIONS ANSWERED

August 2019

There is a lot of misunderstanding about grouse shooting and its associated moorland management. The questions and answers below provide a factual response to the most frequently raised issues.

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#### 1. Is grouse moor management necessary?

Grouse moor management has played a key role in creating and maintaining our upland landscapes, preserving and improving heather habitat and peatland, sustaining some of our rarest plants and wildlife, and promoting biodiversity. Without grouse shooting, the landscape of many upland areas, and the communities they support, would be threatened.

The 1992 Rio Convention on Biodiversity ratified the global importance of UK heather moorland, and it is our duty to protect it. The UK is responsible for 75 per cent of the world's heather moorland and the evidence suggests that the reason the UK has largely retained its heather moorland is due to the presence of management for grouse shooting.

Whilst heather moorland may look wild, in reality it is carefully managed. It is often thanks to its management for grouse shooting that this unique landscape has been maintained or restored, where elsewhere it has been lost. [Recent figures produced by Natural England](#) reveal that some 44,500 acres of moorland have been repaired and revegetated across the North of England, all on land managed for grouse shooting. It is also because of their management that more than 60 per cent of England's upland Sites of Special Scientific Interest are managed grouse moors, and over 40 per cent are also designated as Special Protection Areas for rare birds and Special Areas of Conservation for rare vegetation under the EU Nature Directives.

Grouse moor managers, and seasonal workers employed during the shooting season, help with vital conservation work such as spraying bracken, and removing saplings and invasive shrubs to prevent their encroachment onto the moorland. This labour intensive work is carried out because grouse shooting provides a financial incentive to conserve heather moorland

despite economic pressures and the attractiveness of government subsidies for other activities such as forestry and farming.

The only scientific study of wildlife populations after a driven grouse moor has ceased to operate, but walked-up shooting continued, is in Wales and it shows dramatic declines of many threatened species. Welsh moors were once the most successful grouse moors in the UK supporting an abundance of other wild birds. Since management for grouse shooting ceased, they went into serious decline. Studies on a former grouse moor in [Berwyn](#) show what can happen in just 20 years with golden plover declining by 90 per cent, curlew declining by 79 per cent, ring ouzel by 80 per cent, and black grouse by 78 per cent. Both curlew and lapwing are red-listed by the British Trust for Ornithology, and the curlew has recently been described by the RSPB as the UK's highest conservation priority.

## **2. Does grouse shooting receive subsidy money?**

Some grouse moors are eligible to receive funding from the European Union's Common Agricultural Policy (CAP). Rural payments are provided to support the farming activity that often takes place on these moors and additional grants support conservation work.

At present, farmers and land managers can apply for support payments under the [Basic Payment Scheme \(BPS\)](#) which is Pillar 1 of CAP funding. Only agricultural land is eligible for BPS payments. The Rural Payments Agency, which administers the Scheme in England, states in its guidelines that moorland used primarily for shooting purposes is not eligible for BPS payments and there is also an 'active farmer' test for claimants, along with a range of other criteria to prove that the land is in agricultural use. Similar conditions apply 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 benefits from BPS payments, not grouse shooting. Farming that takes place on moorland is usually eligible for the lowest category of BPS payment, known as 'Upland (Severely Disadvantaged Areas) Moorland'.

Some moors also receive grants through [Countryside Stewardship Schemes \(CSS\)](#) or [Higher Level Stewardship \(HLS\)](#) under Pillar 2 of CAP funding which provides 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 are eligible for these schemes shows how grouse moor management benefits conservation and habitat management. Funding under these schemes is often provided in the form of capital grants for particular projects such as woodland improvement and river management, and does not directly benefit grouse shooting.

All farmers and land managers who claim funding under the Basic Payment Scheme or Countryside Stewardship Schemes, whether on moorland or any other type of agricultural land, must follow [cross compliance rules](#). These rules include minimising soil erosion, keeping public rights of way accessible, preserving habitats and species, and protecting water sources.

Until negotiations conclude and the UK leaves the EU, all existing arrangements remain in place, including rural payments and grants. The Conservative/DUP agreement provides an assurance to provide the same cash total for farm support until the end of this Parliament. The Government's recent [Health and Harmony](#) consultation on the future of food, farming and the environment, set out the basis for a new agricultural policy outside of the EU which will involve a move away from direct income support in favour of payments for certain types of 'public goods'.

## **3. Does grouse moor management contribute to flooding?**

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.

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.

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, and grouse moor managers, working in conjunction with government and other organisations, are actively working on a number of projects to restore damaged peatland. This includes blocking government-incentivised drains, with over 4,000km having now been blocked, and re-vegetation of bare peatland in order to raise water tables across the uplands.

Peat Restoration Partnerships have proved highly effective and are an example of stakeholders working together to restore peatland. [Recent data produced by Natural England](#) indicates that around 44,500 acres of moorland have 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. Their management plan for 2014-2019 recognises that "sound grouse moor management can contribute significantly to the conservation and enhancement of natural beauty".

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 this 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".

#### **4. Is grouse moor management bad for 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 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 therefore 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.

Peat Restoration Partnerships have proved highly effective and are an example of stakeholders working together to restore peatland. In 2013 the [Yorkshire Peat Partnership](#), which receives support from grouse moor owners, farmers and the Environment Agency, reached a milestone with the successful restoration of just over 24,700 acres of peatland. In the North Pennines, the work that has been undertaken to block moorland drainage ditches has resulted in the North Pennines Area of Outstanding Natural Beauty Peatland Programme being awarded the Climate Change Award at the Durham Environment Awards 2015.

## **5. Is heather burning damaging to the environment?**

Grouse depend almost entirely on heather moorland and grouse moor managers understand that a healthy population of grouse relies on having a healthy heather habitat.

Part of grouse moor management involves rotational heather burning, otherwise known as ‘muirburn’, on areas of shallow peat which is undertaken to increase the diversity of heather age and structure. Burning is also beneficial for sheep as the patches of fresh burn provide space for grass varieties and young heather to grow which helps to spread grazing out across the moor.

Burning takes place in patches on a rotational basis, the frequency of which depends 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, grouse and other ground nesting 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 beneath the vegetation, avoiding the resultant loss of carbon and delay in regrowth of the heather. On areas of deep peat, heather cutting often takes place rather than burning to avoid any possible damage to the peatland.

Controlled, rotational burning can also 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 such as that on Saddleworth Moor cause considerable environmental damage as they burn with greater intensity burn the peat beneath the vegetation, and prevent the peatland 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 fighting equipment. Some 4 square miles of moorland have destroyed, the environmental damage is considerable. A wild fire on Bleaklow Moor in 2003 cost almost £3,000 per hectare to restore and cost the local economy £500,000. The cost of the fire on Saddleworth Moor is likely to be several million pounds without taking the environmental cost into account.

The statutory Code of Practice for heather burning, [The Heather and Grass Burning Code](#) (Defra, 2007), was developed in association with key stakeholders under the last Labour Government and 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 SSSI, consent is required from Natural England. More than 70 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 and there are strict limits on the amount of heather than can be burned at any one time.

## **6. Is predator control necessary?**

As ground nesting birds, the eggs and chicks of grouse are vulnerable to predation (being killed by predators), 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, crows, stoats and weasels, is therefore essential, and benefits not just the 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 by Penny Anderson Associates](#) 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 per cent nationally, 96 per cent 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.

## **7. Does illegal killing of birds of prey take place?**

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 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 achieved through stakeholders working together. The Countryside Alliance fully supports Defra's [Joint Hen Harrier Recovery Plan](#) which was published in January 2016 with the support of the RSPB. In July 2016 the RSPB chose to withdraw their support, only six months after this long awaited Plan had been published, and before any brood management schemes had been trialled. The RSPB are the only conservation group to have withdrawn their support for the Plan. The Hawk & Owl Trust will be 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](#) reveals 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 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](#)).

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 a 33 year period from 1986 - 2018. 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.

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 increasingly 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.

## **8. Is lead ammunition safe to use?**

Lead is a toxin and there are potential environmental and human health risks from using it in ammunition. However, it is possible to manage and control those risks and reduce them to

acceptable levels through enforcement of the existing restrictions and careful monitoring, without the need for a complete ban or further restrictions.

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 majority of the evidence used to justify increasing restrictions, or a complete ban on lead ammunition, is outdated and heavily reliant on research undertaken in other countries which does not bare comparison to the situation in this country. Further, unscientific, restrictions could potentially have serious implications for the gun trade, the rural economy and the natural environment. Without lead many shooting activities could be substantially curtailed.

Lead can be found in all food types at a variety of levels. The most comprehensive report on the effects of lead on public health, undertaken by the [European Food Standards Agency 2012](#) concluded that lead from game meat represents 0.1 per cent of average total dietary lead exposure. The report shows that the average European consumer is exposed to 62 times more lead from “beer and substitutes” compared to “game meat”.

The opportunities for reducing the lead in game meat by improving game handling is just one mitigation measure that could be implemented to reduce the level of risk to an acceptable level. Cutting out the bruised meat and any bullet channels has the benefit of removing any excess lead that has broken away from the pellet, and is the current given advice in Sweden.

On 12 July 2016, the then Environment Secretary, Rt Hon Liz Truss MP, [responded to the report on lead ammunition](#) that had been submitted by the remaining members of the Lead Ammunition Group. Following receipt of the report, the Food Standards Agency (FSA) was consulted about the human health risk and they concluded that the evidence provided in the report did not affect their [current advice](#) which has been in place since 2012. With regard to the impact of lead ammunition on wildlife, it was found that the report did not provide evidence of causation linking possible impacts of lead ammunition with sizes of bird populations in England. In both instances, human health and wildlife, the report did not show that the impacts of lead ammunition were significant enough to justify changing current policy, and the report’s recommendation to ban the use of lead ammunition was therefore not accepted.

## **9. Is grouse shooting elitist?**

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 tax payer.

With the right conditions and management, grouse populations can flourish, and produce enough 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.

Grouse shooting also brings the rural community together in areas that can struggle with social isolation and lack of employment. In addition to the people shooting, a day's driven 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. Pickers-up and dog handlers devote hours of time to the training and care of their working dogs, and they are a vital in ensuring that every bird that is shot is picked up.

## 10. Is grouse shooting sustainable?

Grouse are truly wild birds, living and breeding on the moor. As wild birds, the numbers of grouse can fluctuate dramatically from one year to the next, and from one part of the country to another, with the height of a moor, weather conditions, predation and disease all playing a part. 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. Grouse counts take place in July ahead of the season to determine how many shooting days are likely to be possible. When grouse numbers are low, shoot days may either be limited in number, or completely cancelled if grouse moor managers consider there to be insufficient birds to maintain a healthy breeding population for the next season. It is important to note that management continues regardless of whether shooting is possible in any given season.

The vast majority of grouse that are shot are eaten, either by those taking part in the shooting or sold to restaurants, butchers and caterers across the country. There are a number of ways which grouse can be enjoyed. Last year, the [British Game Alliance](#) was launched to promote high standards across the board for game shooting and realise the marketing opportunities for game meat both at home and in rapidly growing markets abroad. Since its launch it has already been very effective, with over 550 shoots joining the scheme. It is also supported by a wide range of MPs who wrote an open letter to the shooting community recommending the British Game Alliance. It can be read [here](#).

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 three dimensions to the core of mainstream sustainability - environmental, social, and economic factors. All three need to be addressed by anyone looking at changing the status quo. The main alternative land uses to grouse shooting such as forestry, sheep farming, abandonment, and 'eco-tourism' would all have serious consequences for the future of our uplands and the communities they support.

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