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16 April 2020

Dear Martin,

**RSPB's Draft Conservation Principles for Gamebird Shooting and Associated Land Management**

Thank you for your email of the 20 February, inviting key stakeholders with an interest in gamebird shooting to respond to your consultation on the RSPB's draft conservation principles for gamebird shooting and associated land management, please find below comments from nine organisations representing shooting and landowning interests in the UK.

Shooting is worth £2 billion to the UK economy each year and delivers nearly two million hectares of land managed for conservation as a result of its activities. As well as providing habitat for quarry species this land also provides food over winter for farmland birds. Shooting is a major motivator behind the management and creation of woodlands and hedgerows which would otherwise be undermanaged and at risk of being lost. In the uplands, grouse shooting provides the incentive to conserve and manage heather moorland and the unique assemblage of birds on it.

The Game and Wildlife Conservation Trust is currently carrying out a consultation on the Principles of Gamebird Management in the UK. We support those principles and expect all who shoot or manage shooting in the UK to implement and abide by them as well as following the best practice guidelines in the Code of Good Shooting Practice. This code is self-regulated and audited on shoots through the British Game Alliance shoot assurance scheme.

## Principles of Gamebird Management in the UK

**(1) Maximise nature's gain:** Habitats created and managed to support gamebirds include: woodland, hedgerows, field margins, game cover crops, wild bird seed mixes, moorlands and wetlands. Alongside the habitat provided and managed for gamebirds, predation control and supplementary feeding are often important aspects of game management and these activities can benefit a wide range of other wildlife. All shoots, whether based on wild gamebirds, released gamebirds or a combination of both, should strive to maximise the overall gain to wildlife.

**(2) Minimising impact:** Through the active management of the countryside, game management can support the growth of game populations, allowing a sustainable harvest with positive benefits for other species. This should avoid gamebird population levels that could damage other land uses such as farming, forestry and nature conservation.

**(3) Gamebird releasing numbers:** Gamebirds should only be released and managed at densities appropriate to the local circumstances, so that there is a net environmental gain from undertaking such activity. Before the first shoot day, all released birds should be fully adapted to life in the wild and shoots should ensure that all game fit for human consumption is eaten.

**(4) Releasing habitat:** Releasing gamebirds in the summer increases the number of birds available to shoot later in the year. Shoot managers should only release gamebirds in habitats that enable them to acclimatise quickly to life in the wild and support their year-round needs.

**(5) Wild game numbers:** Grouse and wild partridge shoots should assess their proposed bag by calculating the sustainable yield based on annual game counts and follow GWCT recommendations for sustainable harvest of wild game.

**(6) Habitat creation:** Appropriate habitat creation and management is needed for all gamebirds. Maintaining this critical and appropriate diversity of habitats is essential. Shooting provides an incentive to privately fund the creation and management of habitats across large areas of the countryside specifically for wildlife – something that is usually only incidental to other forms of land use such as forestry or farming.

**(7) Reducing predation pressure:** Predator control is undertaken to reduce predation pressure at key times of year. This includes in the spring, to reduce levels of predation on nesting birds, nests and chicks and during late summer to protect released game. The predators targeted are common and successful generalists, so a temporary reduction in their numbers locally or regionally will not jeopardise their population or conservation status. Predation control activities should be undertaken according to best practice guidelines to ensure they are legal, humane and effective. In no circumstances should any protected species be illegally killed to protect game, nor should any predator control activity negatively impact the conservation status of a species.

We are concerned about the RSPB's approach to its consultation. Its draft principles are clearly intended to lead respondents to agree to a framework for the licensing of all shooting activities in the UK which would be a significant restriction on sustainable use.

Shooting influences the management of two thirds of the UK's rural land and often this includes working with conservation partners such as the RSPB and Wildlife Trusts. For these successful collaborations to continue, the relationship between the parties needs to be fair and balanced. The RSPB's draft principles, in particular six and seven, do not provide the basis for a positive relationship with shooters as conservationists and fails to recognise the many benefits associated with sustainable use in the UK.

Sustainable use is recognised as a legitimate use of resources by many multilateral environmental agreements and EU directives, including the Bern Convention, the Convention on Migratory Species and both the Birds and Habitats Directives. The benefits of sustainable use to society, the environment and the economy are widely referenced through documents such as the EU's Guide to Sustainable Hunting Under the Birds Directive which states that shooting "is an activity that provides significant social, cultural, economic and environmental benefits in different regions of the European Union". The GWCT's principles on game management are aligned with the European Charter on Hunting and Biodiversity under the Bern Convention which recognises the important role of sustainable use as a motivator for habitat maintenance and species conservation. Furthermore, these principles are compliant with the Addis Ababa Principles and Guidelines for the Sustainable use of Biodiversity under the Convention on Biological Diversity which actively seek to promote and enhance sustainable use worldwide.

The draft principles outlined by the RSPB go far beyond those recognised internationally. Whereas international sustainable use principles recognise the value of sustainable use and seek to enhance it, the RSPB's draft principles are clearly intended as a tool to restrict it. The RSPB's draft principles also fail to consider the social and financial contributions arising from sustainable gamebird management, despite these factors being enshrined in the Birds Directive, which requires that species are maintained "*at a level which corresponds in particular to **ecological, scientific and cultural requirements**, while taking account of **economic and recreational requirements***". Similarly, principle 1 of the European Charter on Hunting and Biodiversity states that sustainable hunting management should "*Favour multi-level governance that maximises benefit for **conservation and society***", whilst making it clear that these principles should be "*treated as facilitative and not prescriptive*".

The conservation, financial and social values that arise from sustainable gamebird management are well documented and highlighted in the research, 'The [Value](#) of Shooting' and 'The Personal [Value](#) of Shooting'. We would draw your attention to the following:

- Shoots providers spend nearly £250 million a year on conservation
- Shooters spend 3.9 million workdays on conservation – that's the equivalent of 16,000 full-time jobs
- Two million hectares are actively managed for conservation as a result of shooting

Our view is this loss of conservation workforce and financial spend would not be easily replaced through Government or charitable or private funding, meaning that vital conservation work would not be undertaken.

Principle 2 of the Addis Ababa principles and guidelines states that "*local users of biodiversity components should be sufficiently empowered and supported by rights to be responsible and accountable for use of the resources concerned*". Similarly, principle 6 of the European Charter seeks to "*Encourage use to provide economic incentives for conservation*". These principles

recognise the need for sustainable use guidelines to be supportive and facilitative, not punitive and restrictive, such as the RSPB's draft guidelines are clearly intended to be. Conservation works best when it is done in partnership, but the RSPB's draft principles are at risk of driving a wedge between consumptive and non-consumptive conservation partners in the UK.

The signatories believe there is sufficient legislation in place to manage shooting activities and we would ask that the RSPB adopt the proposed GWCT principles. These principles are based on accepted international principles and are compatible with the objectives of the major environmental treaties. These principles will facilitate the maximisation of the benefits to the environment and economy arising from sustainable gamebird management and allow partners to work together.

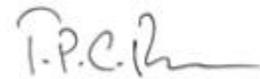
Yours sincerely,



Liam Bell  
Chairman  
NGO



Eoghan Cameron  
Chairman  
BASC



Tim Bonner  
Chief Executive  
Countryside Alliance



Nick Downshire  
Chairman  
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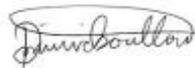
David Johnstone  
Chairman  
Scottish Land & Estates



Mark Tufnell  
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Alex Hogg  
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The Scottish Gamekeepers  
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Dominic Boulton  
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Tom Adams  
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Please direct your reply to Mr Eoghan Cameron, Chairman, BASC, Marford Mill, Rossett, Wrexham LL12 0HL