

# Shooting Animals for Sport: Worthless

The shooting industry claims to be worth £2 billion to the UK economy and support 75,000 FTE jobs. However, the report behind these headlines is flawed and its findings are untenable.



## Advocacy statements based on opaque calculations

The League Against Cruel Sports asked economic experts from Sheffield Hallam University and Cormack Economics<sup>1</sup> to review the two Public & Corporate Economic Consultants (PACEC) reports on the economics of sport shooting (2006<sup>2</sup>, 2014<sup>3</sup>). Their review focused on methodological aspects of PACEC's reports, the overall robustness of the approaches taken and the conclusions drawn. Their work did not involve any primary data collection or discussion of the ethics of sport shooting and associated activities.

The experts judged PACEC's reports to be *in essence advocacy statements, containing much information that is not testable, robust data, but opinion submitted by a sample with a stake in the outcomes*<sup>4</sup>. They identified several methodological weaknesses, omissions and flaws which make the findings of the original reports untenable.

They concluded:

- **It is not possible to accept the estimates of Gross Value Added (GVA) of the sporting shooting sector given in either the PACEC 2006 or 2014 report.** Office for National Statistic (ONS) guidelines were not followed, inappropriate items were included and the methodology for calculations was often not transparent.
- **Reanalysing PACEC's 2014 data according to standard Treasury Green Book guidance suggests a value to the UK economy between £267m and £746m.**
- **The subsidies given to the sector were not discussed in either PACEC report.** This burden on the public purse should have been deducted from the value of the industry.
- **Displacement of other economic activities e.g. leisure and tourism, agricultural activities and nature conservation, were not discussed.** These costs too must be deducted from the value of the industry.
- **PACEC's figures suggest a very low rate of pay for those employed directly in the shooting industry** - an average of £6,129 per annum. These are either below the minimum wage or actually paid hobbies.<sup>5</sup>

## Shooting sports are not homogenous

The 2014 PACEC report lumped together all shooting sports, including all forms of live animal shooting as well as non-animal forms such as clay and target shooting. That is akin to lumping all sports that use a ball together in one economic analysis. While the various forms of

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shooting all share the same basic instrument – a gun – they vary in almost every other context, particularly in the level of suffering they cause.

A closer look at PACEC (2014) reveals that clay and target shooting, which do not involve killing animals, account for a very large part of the shooting industry. Of the 70,000 shooting providers in the UK, 23,000 – effectively 1/3 – provide only clay and/or target shooting, no animal shooting.<sup>6</sup>

Moreover, the number of shooting participants, shooting days and participant days are all higher for non-animal shooting (clay and target) than animal shooting (Table 1). Uncontentious forms of shooting – where no animals are harmed – therefore account for a large part of PACEC's £2bn valuation of the industry. This demonstrates that shooting animals for sport is not as economically important as the headlines imply, and that there is a growing appetite for shooting sports that do not involve killing animals.

**Table 1. Annual figures for the UK shooting industry as reported in PACEC's 2014 report**

	Participants	Shooting days	Participant days
All animal quarry	380,000	820,000	3,600,000
Clay and target	400,000	870,000	7,400,000

## The key is non-resident expenditure

Modern impact assessments tend to discount resident spending on the activity in question.<sup>7</sup> According to economic experts, including those at Stanford University's Center for Responsible Travel, money that residents spend on an activity should not be viewed as providing substantive economic impact to the local or national economy as this money would have been spent in the local economy anyway.<sup>8,9</sup> This was confirmed by a question in PACEC (2014) asking shooting participants if they would spend more money on other leisure activities if shooting sports were not possible. Five out of six respondents said they would.<sup>10</sup>

In the recent PACEC report, shooting providers said that, on average, 82% of their income came from people in their local region and 13% came from the rest of the

UK.<sup>11</sup> A robust approach to impact assessment would eliminate this spending from analyses where possible as it represents a circulation of already existing money rather than new money brought into the economy by shooting. Only the 5% of income originating from foreign shooters can be considered as adding to the national economy.

## A burden on the public purse

Neither of PACEC's reports mentions the numerous subsidies that owners of game estates and grouse moors receive under agri-environment schemes. These subsidies are intended to help farmers manage their land in an environmentally friendly way and support food production. However, because game estates often plant agricultural crops and woodland to provide food and cover for hunted game, many qualify for these subsidies. The details of these payments are not publicly available.

A freedom of information request made by Animal Aid to Natural England revealed that, in the 2012/13 financial year, £17.3m in Environmental Stewardship subsidies was awarded in relation to land on which grouse shooting takes place.<sup>12</sup> As moorland managed for grouse shooting accounts for less than half of the land managed for shooting in the UK<sup>13</sup>, the total amount of agri-environment funding awarded to the industry must be much higher.

Shooters themselves also benefit from the public subsidy of firearms licences. The price of a shotgun licence has been frozen at £50 since 2001. According to the police, who issue the licences, it costs £200 per licence to operate the licensing system and conduct the background checks required for each licence. This means that taxpayers subsidise firearms licences at a cost of approximately £19m every year.<sup>14</sup>

The industry also needs to answer some serious questions about taxation. HMRC has been looking at possible under-collection of national insurance and income tax from casual staff for a number of years and some shoot operators have been asked for clarification about payment of VAT and business rates.

Shooting Times, writing on recent changes to tax collection from casual staff, highlights how little has actually changed: 'The good news is that the present system, whereby casual beaters are paid in cash without the deduction of tax, is to continue. This deal goes back to a special agreement struck nearly 30

years ago between HMRC and the CLA. For it to apply, the employment must be for one day or less; the beater must be paid at the end of the day; and there must be no contract for further employment. The fact that there is no contract for further employment does not prevent the beater working for the same shoot on subsequent occasions during the season.<sup>15</sup>

In 2006 HMRC announced a crackdown on widespread tax irregularities within the shooting industry, issuing a letter to all shooting providers outlining unacceptable ways to avoid VAT.<sup>16</sup> Shortly afterwards, when the standard rate of VAT increased to 20%, there was a surge of interest in shoots converting to 'sports club' status because these entities are VAT exempt.<sup>17</sup> Even when selling 'surplus' shooting days to non-members, shooting clubs and private syndicates still enjoy VAT exemption.<sup>18</sup>

The cost of vehicle collisions with 1.8 million pheasants every year, as well as other damage caused by game birds released by shooting estates, also needs to be taken into consideration.<sup>19</sup> If pheasants cause damage to neighbouring gardens, or to cars, or to the people travelling in those cars, the person who released them bears no liability, because for this purpose they are classed as wild animals.

## Displaced activities also have economic value

Shooting does not take place in a vacuum; various outdoor pursuits may compete for access to land used for shooting. Yet neither of PACEC's reports takes into consideration the economic value of activities that are displaced by shooting estates, a practice that is customary in robust economic evaluations.

Research by the RSPB found that reintroduced white-tailed eagles bring £5 million of tourist money into the Isle of Mull economy every year, supporting 110 fulltime jobs.<sup>20</sup> Gamekeepers on Scottish shooting estates pose one of the greatest threats to this source of employment through their continued persecution of birds of prey. At least three confirmed poisonings of reintroduced white-tailed eagles were recorded between 2008 and 2012<sup>21</sup>, while in 2014 a newly released eagle disappeared near a shooting estate shortly after being fitted with a satellite tracking device.<sup>22</sup>

Research commissioned by the Scottish Government shows that wildlife tourism in Scotland is worth £276

million a year.<sup>23</sup> The 2014 PACEC report puts the value of shooting sports in Scotland at only £218 million a year. Yet the potential to increase wildlife tourism in Scotland is seriously hampered by the destructive environmental practices and wildlife persecution associated with deer and grouse shooting. There is also an inherent conflict between wildlife tourism, which requires public access to land, and a dangerous activity such as shooting.



## Environmental costs are felt by everyone

Game shooting relies on many practices that cause environmental damage. The economic and social costs of this ecological destruction and degradation are felt by everyone.

Around 50 million pheasants and red-legged partridges, both non-native species in the UK, were released on shooting estates in 2013.<sup>24</sup> For economic reasons, these species are exempt from regulation governing the release of non-native species. Yet there is widespread concern amongst conservationists that this large number of non-native birds has an adverse impact on native wildlife. Multiple studies suggest releasing game birds at this density reduces food available for native bird species and damages habitats vital for nesting birds.<sup>25</sup> Endangered butterfly species, such as the Adonis blue<sup>26</sup> and pearl-bordered fritillary<sup>27</sup>, are also negatively affected when game birds are released in large numbers.

Burning moors to encourage heather growth for grouse pollutes rivers and contributes to climate change, according to a 2014 report by the University of Leeds.<sup>28</sup> The researchers compared moors in ten parts of the Pennines, and found that rivers near burnt sites contained higher levels of heavy metals, such as manganese and iron. The authors concluded that the burning of moors lowers the water table, causing

the deep peat covering to dry out and release pollutants into rivers and carbon into the atmosphere. It also removes naturally occurring chemicals essential for plant growth, and inhibits the spread of sphagnum, a vital peat bog plant.<sup>29</sup>

The widespread use of toxic lead shot contaminates soils and waterways.<sup>30</sup> This problem is not restricted to the shooting of waterfowl; research has shown that driven shooting of partridges and pheasants produces significant accumulation of lead shot in the soil of intensively hunted estates.<sup>31</sup> Animals are also poisoned by the direct ingestion of discharged lead ammunition, either as fragments consumed along with grit or seeds, or as bullets or pellets consumed while scavenging shot game.<sup>32</sup> Lead negatively affects humans and other animals at the lowest measurable concentrations and has already been banned from most uses that could result in human and wildlife exposure.<sup>33</sup> Yet the UK shooting industry continues to defend the use of lead ammunition.<sup>34</sup>

## Conclusion

Anything more than a cursory glance of the shooting industry commissioned reports (PACEC 2006 & 2014) reveals biased and incomplete data underpinning inappropriate methodologies. The review of these reports commissioned by the League puts the value of the industry at less than half of what the industry claims – and a substantial proportion of that comes from uncontentious forms of shooting such as clay and target. Factor in the subsidies the industry receives through agri-environment schemes, gun licence fees and unpaid tax; the value of displaced activities and irrelevance of resident spending; the damage caused to the environment and human health; and the true economic value of shooting animals for sport looks very small indeed.



<sup>1</sup> Cormack & Rotherham (2014) A review of the PACEC reports (2006 & 2014) estimating net economic benefits from shooting sports in the UK.

<sup>2</sup> PACEC (2006) Economic and environmental impact of sporting shooting in the UK. PACEC, Cambridge, UK.

<sup>3</sup> PACEC (2014) The Value of Shooting. The economic, environmental and social benefits of shooting sports in the UK. PACEC, Cambridge, UK.

<sup>4</sup> Cormack P. & Rotherham I. (2014) A review of the PACEC reports (2006 & 2014) estimating net economic benefits from shooting sports in the UK.

<sup>5</sup> Ibid

<sup>6</sup> PACEC (2014) The Value of Shooting. The economic, environmental and social benefits of shooting sports in the UK. PACEC, Cambridge, UK.

<sup>7</sup> Baade R. (2010) Getting into the game: Is the gamble on sports as a stimulus a good bet? In: Pindus A., Wial H. and Wolman H. (Eds) Urban and Regional Policy and Its Effects. Brookings Institution Press.

<sup>8</sup> Center for Responsible Travel (2014) Economic Impact of Bear Viewing and Bear Hunting in The Great Bear Rainforest of British Columbia.

<sup>9</sup> Rockport Analytics (2012) The economic impact of Super Bowl XLVI. Accounting the full economic benefits to the Indianapolis Metropolitan Area. West Chester, PA.

<sup>10</sup> PACEC (2014) The Value of Shooting. The economic, environmental and social benefits of shooting sports in the UK. PACEC, Cambridge, UK.

<sup>11</sup> Ibid

<sup>12</sup> Animal Aid (2014) Calling the shots – The power and privilege of the grouse-shooting elite.

<sup>13</sup> PACEC (2014) The Value of Shooting. The economic, environmental and social benefits of shooting sports in the UK. PACEC, Cambridge, UK.

<sup>14</sup> Squires P. (2014) The unacceptable (?) face of elite gun culture. Criminal Justice Matters 96: 20-21.

<sup>15</sup> <http://www.shootinguk.co.uk/features/down-to-brass-tax-957#LgXTfrxcW7A932UF.99>

<sup>16</sup> HMRC letter dated April 2006 signed by Brian Spooner for HMRC

<sup>17</sup> <http://www.shootinguk.co.uk/shooting/game-shooting/hmrc-a-guide-to-game-shooting-and-the-taxman-9853>

<sup>18</sup> <http://www.articles.scopulus.co.uk/Good%20News%20For%20Shooting%20Syndicates.htm>

<sup>19</sup> Bicknell J., Smart J., Hoccom D., Amar A., Evans A., Walton P., Knott J. (2010) Impacts of non-native gamebird release in the UK: a review. RSPB Research Report Number 40. ISBN: 978-1-905601-26-4

<sup>20</sup> Molloy D. (2011). Wildlife at work. The economic impact of white-tailed eagles on the Isle of Mull. The RSPB, Sandy.

<sup>21</sup> APS Group Scotland (2013) Wildlife crime in Scotland: 2012 annual report. Scottish Government, September.

<sup>22</sup> Miller D. (2014) Police search after tagged sea eagle disappears. BBC News, April 24th.

<sup>23</sup> International Centre for Tourism and Hospitality Research (2010) The Economic Impact of Wildlife Tourism in Scotland. Scottish Government Social Research.

<sup>24</sup> Winter S. (2013) Beware invasion of the 50,000,000 pheasants as shooting season starts. Sunday Express, Sept 29th.

<sup>25</sup> Ibid

<sup>26</sup> Callegari S.E., Bonham E., Hoodless A.N., Sage R.B. and Holloway G.J. (2014) Impact of game bird release on the Adonis blue butterfly *Polyommatus bellargus* (Lepidoptera Lycaenidae) on chalk grassland. European Journal of Wildlife Research 60:781-787.

<sup>27</sup> Corke D. (1989) Of pheasants and fritillaries: is predation by pheasants (*Phasianus colchicus*) a cause of decline in some British butterfly species? British Journal of Entomology and Natural History 2:1-14.

<sup>28</sup> Brown L.E., Holden J. and Palmer S.M. (2014) Effects of moorland burning on the ecohydrology of river basins. Key findings from the EMBER project. University of Leeds.

<sup>29</sup> Ibid

<sup>30</sup> Pain D.J., Fisher I.J. and Thomas V.G. (2009). A global update on lead poisoning in terrestrial birds from ammunition sources. In R.T. Watson, M. Fuller, M. Pokras and W.G. Hunt (Eds). Ingestion of Lead from Spent Ammunition: Implications for Wildlife and Humans. The Peregrine Fund, Boise, Idaho, USA.

<sup>31</sup> Mateo R. (2009) Lead poisoning in wild birds in Europe and the regulations adopted by different countries. In R.T. Watson, M. Fuller, M. Pokras and W.G. Hunt (Eds). Ingestion of Lead from Spent Ammunition: Implications for Wildlife and Humans. The Peregrine Fund, Boise, Idaho, USA.

<sup>32</sup> Pain D.J., Fisher I.J. and Thomas V.G. (2009). A global update on lead poisoning in terrestrial birds from ammunition sources. In R.T. Watson, M. Fuller, M. Pokras and W.G. Hunt (Eds). Ingestion of Lead from Spent Ammunition: Implications for Wildlife and Humans. The Peregrine Fund, Boise, Idaho, USA.

<sup>33</sup> Ibid

<sup>34</sup> <http://www.countryside-alliance.org/ca/file/CaseFor-Lead2013.pdf>