

Evidence for House of Commons Petitions Committee's Inquiry into Driven Grouse Shooting – League Against Cruel Sports

About the League Against Cruel Sports

1. The League Against Cruel Sports (the League) is a charity that brings together people who want to stop cruelty to animals in the name of sport.
2. Established in 1924, we successfully use lawful investigations, campaigning and lobbying to make a difference in the UK and around the world.
3. The League is opposed to the shooting of animals for sport. Our policy is based both on our moral objection to killing for sport and because of the unnecessary suffering and collateral damage to wildlife and the environment that is caused by commercial shooting. These problems are particularly notable in the driven grouse shooting industry.
4. The League was one of the sponsors of the petition to ban driven grouse shooting¹ and many of our supporters have signed it. We welcome the opportunity to submit evidence on the issue of driven grouse shooting, highlighting our concerns with the industry and why we believe it should be banned.

We have outlined why driven grouse shooting needs to be banned in the sections below:

Gamebird Suffering

5. According to industry statistics an estimated 700,000 grouse are shot every year in Britain for 'sport'.²
6. Anyone who can afford the cost of a single day's shoot can take part in driven grouse shooting with no training or proof of shooting competence necessary. This means many unskilled shooters will not kill the grouse outright and instead clip or maim them with their shots. This results in long and lingering deaths.
7. Writing in the Fieldsports Magazine Simon Ward stated, *"Unlike any other game bird grouse can fly in a most unpredictable fashion, twisting and curling as they hug the*

¹ E-petition 125003 <https://petition.parliament.uk/petitions/125003>

² British Association for Shooting and Conservation. 2014. *Grouse Shooting and Management in the UK*. <http://basc.org.uk/wp-content/uploads/downloads/2015/03/Research-White-Paper-Grouse-shooting-and-management.pdf>

contours of the moor, skimming the tops of the heather".³ Driven grouse shooting is therefore seen as the most challenging of driven game shooting, likely making it more difficult for inexperienced shooters to kill the grouse outright.

8. A former Training and Development Officer for the British Association for Shooting and Conservation (BASC) talked about birds being wounded rather than killed outright when he stated that 40 per cent of all birds shot at for sport are wounded rather than killed outright, and are never recovered.⁴ In this instance he was referring to driven pheasant shooting, however this figure could still be applied to driven grouse shooting, and could be higher due to driven grouse shooting being more challenging as described earlier.
9. If you take the statistic of 40 percent, mentioned by BASC's former Training and Development Officer, of driven pheasants wounded and not killed outright, keeping in mind that for driven grouse shooting the wounding rate may be even higher, and apply this to the 700,000 grouse shot, it suggests that every year around 280,000 grouse could suffer long and lingering deaths as a result of driven grouse shooting. We believe this is likely a conservative figure. This is clearly a significant compromise of animal welfare and one of the primary reasons why the League is calling for the practice of driven grouse shooting to be banned.

Raptor Persecution

10. Illegal raptor persecution on grouse moors is relentless. We continue to see countless cases of raptor persecution so devastating that the hen harrier is on the brink of extinction as a breeding species in England with just three successful breeding pairs in 2016, none of which were on grouse moors⁵.
11. The evidence for this assertion that raptor persecution is relentless on grouse moors is comprehensive and we believe that it will be covered in detail by other evidence submitted to this inquiry.
12. The evidence is undeniable and devastating to the driven grouse shooting industry. For years conservationists have attempted to reason with the industry through dialogue and good faith. This has clearly been in vain and the industry has shown it is either unwilling or incapable of cleaning up its act.
13. This became even clearer in a recent statement from the Director of the Moorland Association who said in the Sunday Times, *"If we let the hen harrier in, we will soon*

³ Simon, W. *How to shoot grouse – with Simon Ward*. <http://www.fieldsportsmagazine.com/Shooting-Instruction/how-to-shoot-grouse-with-simon-ward.html>

⁴ Geoffrey Underwood. 2007. Former Training and Development Officer for BASC giving evidence at employment tribunal. <http://www.animalaid.org.uk/h/n/CAMPAIGNS/pheasant/ALL/1615/>

⁵ Martin Harper RSPB. 2016. *Why the RSPB is withdrawing support for the Hen Harrier Action Plan*. <http://www.rspb.org.uk/community/ourwork/b/martinharper/archive/2016/07/25/withdrawal-from-the-hhap.aspx>

have nothing else".⁶ This is an astounding statement and seems to indicate an admission that grouse moor management works to prevent hen harriers from nesting on grouse moors. This is why there are no hen harriers nesting on grouse moors as they are not 'let in'. It is no coincidence. It is very intentional.

Snares

14. In order to produce unnaturally high densities of grouse, gamekeepers use snares to catch predators such as foxes. Although their purpose is to immobilise target animals, most snares cause extreme suffering to animals and often lead to a painful, lingering death.⁷
15. The majority of snare use can be found on shooting estates, including driven grouse moors.⁸ In 2012, DEFRA produced a report on snaring in England and Wales which suggests that up to 1.7 million animals are trapped in these primitive devices every year.¹⁴
16. Moreover, because snares capture any animal that happens to step into them, little more than a quarter of the animals trapped in Defra's field studies were foxes – the intended victims.
17. The other three quarters included protected species such as hares (33% of all captures), badgers (26%) and a further 14% described only as 'other'. That is almost a quarter of a million animals, including deer and domestic pets such as cats and dogs every year.¹⁴
18. Also, Defra's Independent Working Group on Snares concluded in 2005 that it would be difficult to reduce non-target captures to less than 40%.⁹
19. The industry claims that that effective fox control is an integral part of 'wildlife management' in protecting grouse from predation and that snaring is central to this. They also state that snaring has no functional replacement in the effective control of fox predation. The League contests this. Nevertheless, the stance of the industry is clear in that they are unwilling to move away from snaring in the management of grouse moors, despite their admission that "*captured animals struggle and may be injured*" and "*non-target animals such as badgers and hares are sometimes caught*".

¹⁰

⁶ Dr Mark Avery. 2016. Elsewhere in the media: Moorland Association Admits Criminality?

<http://markavery.info/2016/08/08/media-moorland-association-admits-criminality/>

⁷ League Against Cruel Sports. 2016. *Snares: Time for a Ban*.

<http://www.league.org.uk/~media/Files/LACS/Publications/Snares-Time-For-A-Ban-2016.pdf>

⁸ League Against Cruel Sports. Snaring webpage. <http://www.league.org.uk/our-campaigns/snares>

⁹ Defra. 2005. Defra code of practice on the use of snares in fox and rabbit control.

<http://webarchive.nationalarchives.gov.uk/20130402151656/http://archive.defra.gov.uk/wildlife-pets/wildlife/management/documents/snares-cop.pdf>

¹⁰ Game and Wildlife Conservation Trust. Recommendation on Fox Snares.

<http://www.gwct.org.uk/policy/position-statements/recommendations-on-fox-snares/>

20. Therefore by their own admission the industry is complacent in regards to the animal suffering snares cause and also the collateral damage of non-target and protected species such as badgers in order to facilitate their profits.
21. The League believes this level of animal suffering and killing of protected species in order to facilitate driven grouse shooting is completely unacceptable.

Fenn Traps and Cage Traps

22. As part of their war on potential grouse predators, gamekeepers also kill countless corvids as well as small mammals (mainly stoats and weasels) every year. Corvids are lured into traps using a live decoy bird which can be left in the trap for days or weeks in all weather; some decoy birds are even held captive permanently and reused in the traps year after year.¹¹ Small mammals are caught with spring-loaded traps designed to crush bone.¹²
23. Similar to snaring the indiscriminate nature of these traps is a serious cause for concern with repeated instances of non-target and protected species being caught on grouse moors.
24. Non-target species have included bird species such as dipper (amber status), common sandpiper (amber status) and ring ouzel (red status). This collateral damage, particularly on the ring ouzel, as a result of grouse moor management has been highlighted on Dr Mark Avery's blog.^{13 14}
25. Illegal bird traps have also been recently discovered on the Deeside Grouse Moor in the Cairngorms National Park, Scotland. Two members of the public found a common gull caught by the legs in traps, later identified as illegally-set spring traps. Due to the extent of the injuries the gull was later euthanised.
26. Commenting on the illegal killing of these protected birds Ian Thomson, RSPB Scotland's Head of Investigations said: *"The deployment of these illegal traps has resulted in the killing of protected birds, with other specially protected species such as golden eagles, red kites or hen harriers also potentially at serious risk from this indiscriminate activity. The fact that this occurred within the Cairngorms National Park, an area that should be a showcase for the best of Scotland's wildlife, makes this all the more appalling."*¹⁵

¹¹ Game and Wildlife Conservation Trust. 2014. *Hints for using Larsen traps*.

<http://www.gwct.org.uk/media/372992/Larsen-use-guidelines-2014.pdf>

¹² League Against Cruel Sports. 2016. *The Case Against Bird Shooting*.

<http://www.league.org.uk/~media/Files/LACS/Publications/The-Case-Against-Bird-Shooting-2016.pdf>

¹³ Dr Mark Avery. 2016. Ring Ousels on the Moor. <http://markavery.info/2016/07/05/ring-ousels-moors/>

¹⁴ Dr Mark Avery. 2013. Not So Glorious... And What About BanGS?.

<http://markavery.info/2013/08/12/glorious-2/>

¹⁵ RSPB. 2016. Illegal bird traps found on Deeside grouse moor.

<https://www.rspb.org.uk/media/releases/422521-illegal-bird-traps-discovered-on-deeside-grouse-moor->

27. The use of these traps, both legal and illegal, to protect grouse from predation on grouse moors, results in what the League can only describe as a massacre of wildlife. Their indiscriminate means that, regardless of whether they are legal or not, non-target species, including protected species, will be caught adding to yet more collateral damage caused by driven grouse shooting. The industry is aware of the collateral damage these traps can cause but again seems complacent about the impact on wildlife in order to increase or protect profits.

Mountain hare culling

28. The Hare Preservation Trust (HPT) have highlighted that there is increasing concern about the status of the mountain hare with reports of it being virtually extinct in some parts of Scotland where it was previously abundant. The HPT point to this decline in some areas with excessive grazing by deer, sheep and cattle which deplete the heather so that less food and cover is available. However, the HPT additionally point out that they have also declined on moorland devoid of deer and sheep, leading to the conclusion that human interference is responsible for the decline in hares.¹⁶

29. Gamekeepers on grouse moors in Scotland and some parts of the north of England cull mountain hares due to unproven fears they carry a tick borne virus which kills grouse chicks and is therefore seen as a threat to the grouse shooting industry. However, there is no clear evidence that culling Mountain Hares increases red grouse densities and so the scientific case for culling Mountain Hares is weak.¹⁷

30. The Mountain Hare is classified as a Priority Species in the UK Biodiversity Action Plan and is listed in Annex V of the EC Habitats Directive 1992, as a species "of community interest whose taking in the wild and exploitation may be subject to management measures". The Habitats Directive requires member states to ensure exploitation of Annex 5 species is: "compatible with their being maintained at a favourable conservation status."

31. Mountain ecologist Dr Adam Watson stated, "... *Gamekeepers on several estates have told me they were instructed to reduce hare numbers and to try to eradicate them... This is supine behaviour, pleasing to or subservient to powerful grouse-shooting interests, but wholly against the wider public interest.*"¹⁸

32. The Hare Preservation Trust believes Mountain Hare culling levels strongly suggest that the EC Habitats Directive is being broken in Scotland.¹⁹

¹⁶ Hare Preservation Trust. Mountain Hares. <http://www.hare-preservation-trust.co.uk/mountain.php>

¹⁷ P. S. Thomson et al. 2016. Environmental impacts of high-output driven shooting of Red Grouse *Lagopus lagopus scoticus*. <http://onlinelibrary.wiley.com/doi/10.1111/ibi.12356/full>

¹⁸ Watson, A. 2016. Quote from article, "Grouse moor owners driving mountain hare to the brink". http://www.heraldscotland.com/news/13131070.Grouse_moor_owners_driving_mountain_hares_to_the_brink/

¹⁹ Hare Preservation Trust. Mountain Hares. <http://www.hare-preservation-trust.co.uk/mountain.php>

33. With this in mind, and the fact that the scientific case for culling Mountain Hares in the first place is weak, it is scandalous that it is allowed to continue, including in the Cairngorms National Park, simply for the interests of commercial shooting interests.

Heather burning

34. Burning heather has been a longstanding practice on grouse moors to encourage the growth of heather for feeding and longer heather in which grouse can nest and hide from predators. This practice is intensifying with burning rotations becoming shorter and the number of annual burns increasing.²⁰
35. These intensive burning practices are responsible for serious environmental damage which occurs primarily on protected areas with 90% of English grouse moors being found on National Parks and Areas of Outstanding Natural Beauty.²¹
36. The EMBER (Effects of Moorland Burning on the Eco hydrology of River basins) study by the University of Leeds found that burning had impacts on peat hydrology, peat chemistry and physical properties, river water chemistry and river ecology.²²

Climate Change

37. Among the numerous important findings of the EMBER project, researchers found that water table depth – the level below which the ground is saturated with water – is significantly deeper in areas where heather burning takes place. A deeper water table means that the peat near the surface will dry out and degrade, releasing stored pollutants, such as heavy metals into rivers, and carbon into the atmosphere.
38. Professor Joseph Holden, a co-author of the study said: *“Altering the hydrology of peatlands so they become drier is known to cause significant losses of carbon from storage in the soil. This is of great concern, as peatlands are the largest natural store for carbon on the land surface of the UK and play a crucial role in climate change. They are the ‘Amazon of the UK’.”*²³

Environmental Degradation

²⁰ Douglas et al. 2015. *Vegetation burning for game management in the UK uplands is increasing and overlaps spatially with soil carbon and protected areas*. Biol. Conserv. 191: 243-250

²¹ British Association for Shooting and Conservation. 2015. *Grouse shooting and management in the United Kingdom: its value and role in the provision of ecosystem services* <http://basc.org.uk/wp-content/uploads/downloads/2015/03/Research-White-Paper-Grouse-shooting-and-management.pdf>

²² Brown, L.E., Holden, J. & Palmer, S.M., 2014. *Effects of Moorland Burning on the Ecohydrology of River basins. Key findings from the EMBER project*. University of Leeds http://www.wateratleeds.org/fileadmin/documents/water_at_leeds/Ember_report.pdf

²³ Holden, J. 2014. Commenting on key findings from EMBER project. https://www.leeds.ac.uk/news/article/3597/grouse_moor_burning_causes_widespread_environmental_changes

39. In its 2015 report to parliament the Committee on Climate Change noted that, “Wetland habitats, including the majority of upland areas with carbon-rich peat soils, are in poor condition. The damaging practice of burning peat to increase grouse yields continues, including on internationally protected sites.”²⁴
40. With repeated burning being inconsistent with international responsibilities to maintain and restore blanket bog to favourable conservation status, it seems ludicrous that intensive burning on grouse moors is allowed to continue unabated.
41. Hydrological impacts of grouse moor management have also been identified in causing elevated dissolved organic carbon (DOC) and water discoloration. This has associated economic consequences with the remedial treatment costs being paid by water companies and in turn their customers.²⁵

Flooding

42. Increasing risk of flooding in communities downstream from grouse moors has also been highlighted as an area of concern in regards to the land management practices. The removal of surface vegetation increases run off so that in the most intense rainfall events flow peaks downstream are exacerbated. It is worth noting that the constituency with the most signatures on the petition to ban driven grouse shooting was Calder Valley which has been flooded several times in recent years.
43. The environmental impacts of driven grouse shooting are further examples of how the driven grouse shooting industry is inconsiderately complacent about the collateral damage they cause to ensure their profits. This is entirely unacceptable and government should act to reverse these damaging effects of grouse moor management.

Overstated Economics

44. The shooting industry claims to be worth £2 billion to the UK economy and support 75,000 FTE jobs.²⁶ However, these figures deliberately obscure the nature of shooting sports and omit taxpayer subsidies and negative financial impact on other businesses.
45. The League asked economic experts from Sheffield Hallam University and Cormack Economics to review the two Public & Corporate Economic Consultants (PACEC)

²⁴ Committee on Climate Change. 2015. *Reducing emissions and preparing for climate change: 2015 Progress Report to Parliament. Summary and Recommendations.* https://www.theccc.org.uk/wp-content/uploads/2015/06/6.738_CCC_ExecSummary_2015_FINAL_WEB_250615.pdf

²⁵ Grayson et al. 2012. *A GIS based MCE model for identifying water colour generation potential in the UK upland drinking water supply catchments.* J Hydrol. 420-421: 37-45.

²⁶ PACEC (2014) *The Value of Shooting. The economic, environmental and social benefits of shooting sports in the UK.* PACEC, Cambridge, UK.

reports on the economics of sport shooting.²⁷ 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.

46. 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.*²⁸ 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.

47. A closer look at the report underpinning these claims that the shooting industry is worth £2bn to the UK economy reveals that clay and target shooting account for a very large part of the shooting industry. Of the 70,000 shooting providers in the UK, 23,000 – effectively one-third – provide only clay and/or target shooting, no animal shooting.²⁹

48. The report also reveals that annually clay and target shooting (no animals harmed) has 7,400,000 participant days compared to all animal quarry shooting which has just 3,600,000 participant days. The forms of shooting where no animals are harmed (clay and target) must therefore form the majority of the industry's £2bn valuation.

²⁷ Cormack & Rotherham. 2014. A review of the PACEC reports (2006 & 2014) estimating net economic benefits from shooting sports in the UK. <http://www.league.org.uk/~media/Files/LACS/Publications/Cormack--Rotherham-2014-Review--of-the-PACEC-2006-and-2014-reports-on-sport-shooting-impacts-MAIN-REPORT.pdf>

²⁸ Cormack & Rotherham. 2014. EXECUTIVE SUMMARY. Having an impact – the economic and environmental effects of countryside sports shooting <http://www.league.org.uk/~media/Files/LACS/Publications/Cormack--Rotherham-2014--A-review-of-the-PACEC-reports-2006--2014-EXECUTIVE-SUMMARY.pdf>

²⁹ PACEC (2014) The Value of Shooting. The economic, environmental and social benefits of shooting sports in the UK. PACEC, Cambridge, UK.

A Burden on the Public Purse

49. 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.³⁰ In 2014 the Government raised the money to which grouse moor owners are entitled by 84% - increasing their subsidy payment to £56 per hectare.³¹

Conflict with Eco-Tourism

50. 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.

51. 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.³² Gamekeepers on Scottish shooting estates pose one of the greatest threats to this source of employment through their continued illegal persecution of birds of prey. At least three confirmed poisonings of reintroduced white-tailed eagles were recorded between 2008 and 2012³³, while in 2014 a satellite-tagged eagle disappeared on a grouse moor shortly after dispersing from the nest.³⁴

52. Research commissioned by the Scottish Government shows that wildlife tourism in Scotland is worth £276 million a year.³⁵ 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 driven grouse shooting. There is also an inherent conflict between wildlife tourism, which requires public access to land, and a dangerous activity such as shooting.

53. A similar lack of enthusiasm for shooting has been found in England. Of eighteen outdoor pursuits examined by Natural England in its 2015 national survey on people's engagement with the natural environment, participation in 'fieldsports'

³⁰ Animal Aid. 2014. Calling the shots – The power and privilege of the grouse-shooting elite.

<http://www.animalaid.org.uk/images/pdf/booklets/callingtheshots.pdf>

³¹ Defra. 2014. CAP boost for moorland <https://www.gov.uk/government/news/cap-boost-for-moorland>

³² Molloy D. 2011. *Wildlife at work. The economic impact of white tailed eagles on the Isle of Mull*. The RSPB, Sandy.

³³ APS Group Scotland. 2013. *Wildlife crime in Scotland: 2012 annual report*. Scottish Government, September

³⁴ Miller D. 2014. *Police search after tagged sea eagle disappears*. <http://www.bbc.co.uk/news/uk-scotland-north-east-orkney-shetland-27142843>

³⁵ International Centre for Tourism and Hospitality Research. 2010. *The Economic Impact of Wildlife Tourism in Scotland*. Scottish Government Social Research.

ranked 17th – a tiny fraction ahead of swimming outdoors.³⁶ The RSPB point out how almost three-million adults go bird watching each year, shooting birds with cameras rather than guns³⁷. This suggests that the public would prefer to see raptors in the sky, rather than driven grouse shooting.

54. Driven grouse shooting is in direct conflict with any attempts to protect raptors and the associated economic benefits of eco and wildlife tourism.
55. A choice has to be made. Either you have driven grouse shooting or you have raptors and eco-tourism. The economics are clear in that eco-tourism can bring much more to local economies, create more jobs and provide uplands that can be enjoyed by everyone rather than restricted to the small numbers participating in commercial shooting.

Summary

56. The League believes the evidence linking driven grouse shooting to wildlife crime and intensive illegal persecution of raptors, as well as the scientific evidence pointing to the environmental destruction of grouse moor management is compelling and cannot be ignored by the Government.
57. The economic experts from Sheffield Hallam University and Cormack Economics clearly show that the perceived economic benefits of commercial shooting have been exaggerated and are untenable. When you then take into account the environmental damage caused by the industry and consider the economic value of activities that are displaced, in particular eco-tourism, driven grouse shooting is in our opinion a burden on the public purse.
58. We find it unacceptable that an industry with questionable economic claims, land management practices that are clearly linked to relentless wildlife crime, indiscriminate wildlife persecution and environmental destruction is allowed to operate unabated, simply to facilitate a hobby of shooting animals for sport.
59. This is why we believe driven grouse shooting needs to be banned. We urge the government to look at the evidence and scientific research and listen to the 123,076 members of the public who signed the e-petition calling for it to be banned.

³⁶ Natural England (2015) Monitor of Engagement with the Natural Environment.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/452934/mene-march-may-2015.pdf

³⁷ RSPB. Fun Facts and Articles – Watching Birds
<https://www.rspb.org.uk/discoverandenjoynature/discoverandlearn/funfactsandarticles/watchingbirds/code/index.aspx>