

# Time for change

Driven grouse shooting advocacy

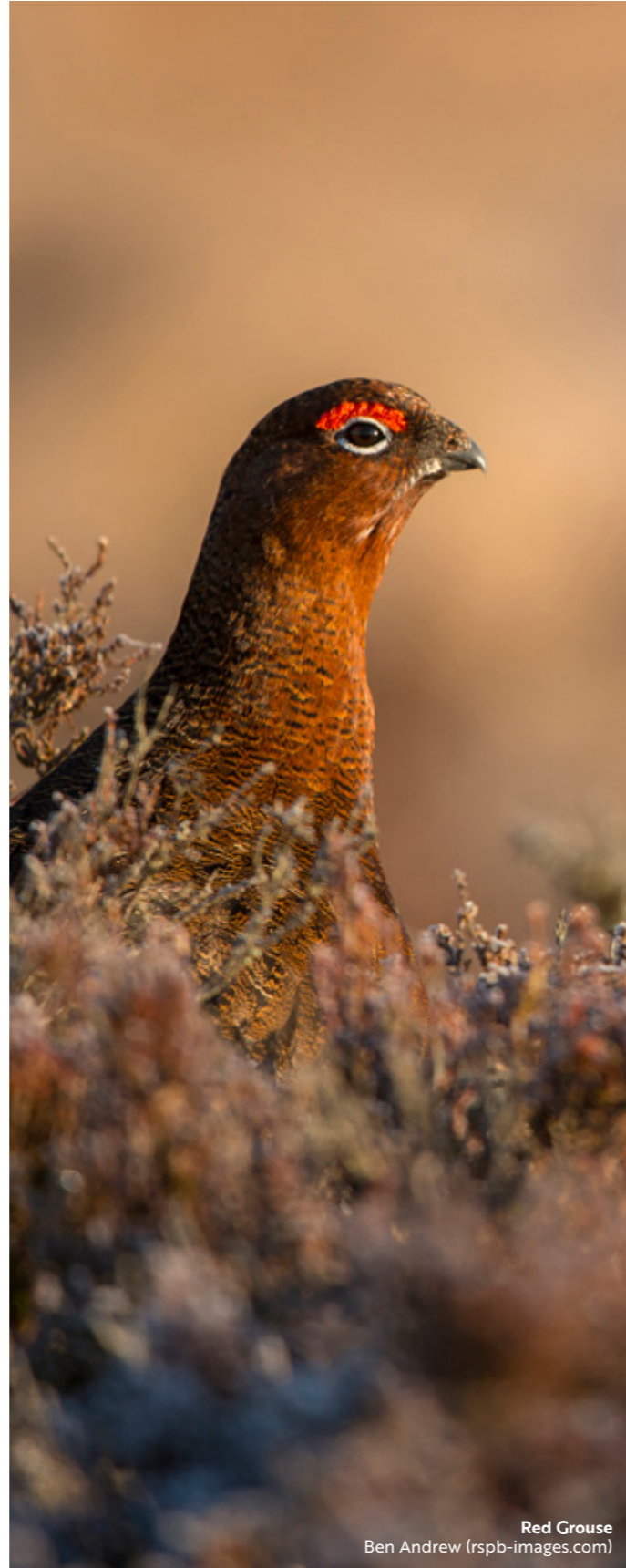
Commit to licensing



## Licensing driven grouse shooting: the case for change

The UK's mountains, moors, hills and valleys are under threat. These amazing landscapes, shaped by time and the communities which call them home, are truly unique places. From the vital role they play in supplying our drinking water and protecting our homes from flooding, to their ability to help us tackle climate change and provide a habitat for some of our most at risk species, we need our uplands. However, years of intensive management, especially for game shooting, farming and forestry, have damaged the uplands leaving them unable to deliver all they could for nature, people or the climate.

We want to breathe life back into these landscapes so that nature is allowed to flourish with a rich diversity of plant and animal life, habitats are restored and the vital services these ecosystems provide are protected and enhanced for everyone. That is why urgent action is needed to stop intensive management practices from damaging these landscapes and instead allow them to be managed for the benefit of all.



Red Grouse  
Ben Andrew (rspb-images.com)

## The impacts of driven grouse shooting

Driven shooting of Red Grouse for sport is a unique activity to the UK (mainly England and Scotland).

Unlike the majority of other types of land management, it is subject to limited regulation. Whilst the RSPB is not opposed to those who want to shoot in a sustainable way, there is growing evidence that the drive to increase grouse numbers underpins increasingly intensive, and sometimes illegal, management practices and has created an industrial scale activity far removed from its origins. There is no statutory reporting of the numbers of grouse that are shot, which is the norm in most other European countries, but an analysis of voluntary bag returns found that the number shot increased 62% between 2004-2016 with an estimated 700,000 Red Grouse shot in the UK each year<sup>1</sup>.

**These management practices and their impacts include:**

- **Illegal bird of prey persecution**

The RSPB's Birdcrime 2021 report showed that raptor persecution remains at a sustained high level in the UK<sup>2</sup>. Key species are missing from these landscapes and current levels of illegal persecution are limiting their populations.

- **Vegetation burning**

The evidence increasingly suggests that burning peatland vegetation is detrimental to habitat condition, carbon storage and the role of peatlands in regulating the flow and supplies of water. The majority of burns reported to the RSPB are in protected areas and on deep peat.

- **Treatment of disease**

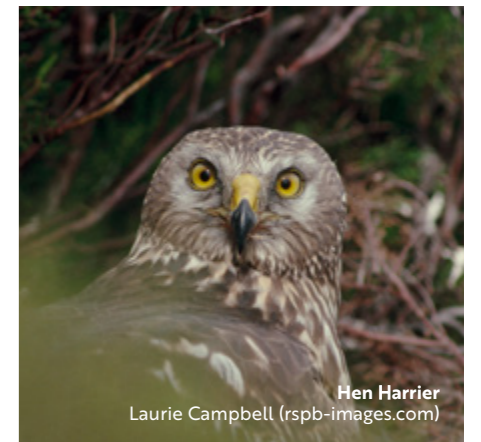
The use of veterinary medicines to treat wild Red Grouse is weakly regulated with no control of dosage and little regard to the possible environmental impacts.

- **Vehicles and tracks**

Strips of peatland are bulldozed for the construction of 'hill tracks' designed to provide easier access for both land managers and shooting parties, causing further damage to peatland habitats.

- **Lead ammunition**

Grouse continue to be shot with lead ammunition, which is toxic to both humans and wildlife<sup>3</sup>.



Hen Harrier  
Laurie Campbell (rspb-images.com)



Heather burning  
Mark Hamblin (rspb-images.com)

<sup>1</sup> [https://www.rspb.org.uk/globalassets/downloads/documents/birds-and-wildlife/gamebird-shooting-review/grouse\\_moor\\_evidence\\_review\\_final.pdf](https://www.rspb.org.uk/globalassets/downloads/documents/birds-and-wildlife/gamebird-shooting-review/grouse_moor_evidence_review_final.pdf)

<sup>2</sup> [https://www.rspb.org.uk/globalassets/downloads/documents/birds-and-wildlife/crime/2021/bc2021\\_report.pdf](https://www.rspb.org.uk/globalassets/downloads/documents/birds-and-wildlife/crime/2021/bc2021_report.pdf)

<sup>3</sup> [http://www.oxfordleadsymposium.info/wp-content/uploads/OLS\\_proceedings/papers/OLS\\_proceedings\\_pain\\_cromie\\_green.pdf](http://www.oxfordleadsymposium.info/wp-content/uploads/OLS_proceedings/papers/OLS_proceedings_pain_cromie_green.pdf)

**Whilst some management practices such as the use of predator control associated with driven grouse shooting can benefit certain species of breeding waders, a more diverse mosaic of habitats under a more sustainably managed system would result in a more resilient environment and provide more benefits for nature, people and climate.**

## Change is needed and needed now

Far removed from traditional ‘walked-up’ shooting, management for driven grouse shoots on many moors is now on an industrial scale, turning upland landscapes into factories for grouse production. We need urgent action to ensure these places are in good health in order to help us tackle the nature and climate emergency for the benefit of us all. In the face of these concerns, change is needed and needed now.

Intensive driven grouse shooting (as currently practiced) is incompatible with Government’s commitments to secure Net Zero, to secure the protection and effective management of 30% of our land for nature by 2030, to prevent wildlife crime against native birds of prey, and to halt and reverse the decline in the abundance and diversity of species. At the same time the industry’s economic and social

sustainability is increasingly threatened by issues including potential resistance to veterinary medicines and the demand for land for carbon offsetting.

**This simply cannot be allowed to continue.**

Despite the best efforts of those in the shooting industry who have tried to champion self-regulation as a means to tackle some of the impacts outlined above (for example committing to the voluntary phase-out of the use of lead ammunition by 2025), these have failed to deliver<sup>4</sup>. A report published by the RSPB<sup>5</sup> looked at the performance of voluntary approaches as alternatives to regulation and found that over 80% of voluntary schemes performed poorly on one or more key measure. Anecdotal evidence suggests that some in the industry are embracing the need for change, but this is not happening at anything like the necessary speed or scale.

<sup>4</sup> <https://eri.ac.uk/research/major-projects/shot-switch/>

<sup>5</sup> RSPB 2015 report: <https://www.rspb.org.uk/globalassets/downloads/documents/positions/economics/using-regulation-as-a-last-resort.pdf>



Meadow Pipit  
Nigel Blake (rspb-images.com)



Landscape showing a pattern of previous heather burning  
Sue Kennedy (rspb-images.com)

**Where voluntary approaches fail, regulation is appropriate to protect the public interest.**

**If the practice of grouse shooting is to continue, we believe there are only two options:**

### Option 1: A ban on driven grouse shooting

There have been strong voices for a ban, based on the damage caused to the countryside, the illegal killing of birds of prey and failure by some to recognise the scale of the problem. Whilst proponents of both licensing and a ban recognise that things must change and believe legislation is needed to achieve this, there is a difference in opinions on the most effective way to achieve the rapid change needed on the ground. A formal ban would bring an immediate halt to damaging intensive land management practices that harm nature and the climate but would prohibit driven grouse shooting (walked-up shooting could continue). However, a ban will be resisted by those who value or are vested in driven grouse shoot management and is likely to polarise positions further in this highly charged debate.

<sup>6</sup> <https://www.gov.scot/publications/werritty/>

<sup>7</sup> [https://www.unodc.org/documents/Wildlife/UK\\_Toolkit\\_Exec\\_Summary.pdf](https://www.unodc.org/documents/Wildlife/UK_Toolkit_Exec_Summary.pdf)

<sup>8</sup> <https://www.legislation.gov.uk/asp/2011/6/part/2/crossheading/liability-in-relation-to-certain-offences-by-others/enacted?view=interweave>

### Option 2: Licensing of driven grouse shooting

There is increasing recognition that licensing is a sensible, pragmatic solution - it is a straightforward process used in a wide range of circumstances, as reflected by its use in many other countries<sup>6</sup>. It was recommended by the recent United Nations Office on Drugs and Crime report on the UK’s approach to tackling wildlife crime<sup>7</sup>, and the Scottish Government is committed to delivering licensing of driven grouse shooting and muirburn (the burning of heather and grass vegetation), as well as banning burning on deep peatland soils.

The key objective of licensing driven grouse shooting in England would be to ensure that in future, shooting activities are conditional on the moorland management (predator control, heather and grass burning, medication, use of lead ammunition, etc.) being in line with license conditions. This would be better for nature and climate and also be of benefit to the grouse shooting industry, enabling them to demonstrate compliance with legal standards and adherence to best practice.

A licensing system with strong sanctions allows the removal of licenses from those who break the law or fail to comply with new codes of practice. For many years, illegal acts against birds of prey have been carried out on grouse moors in remote areas, with little fear of prosecution, due to the high standards required for a criminal burden of proof. One of the benefits of a licensing system is the use of civil sanctions making it easier to tackle wildlife crime.

In addition, and to tackle the illegal killing of birds of prey, the introduction of “vicarious liability”<sup>8</sup> is needed to ensure that landowners and managers responsible for running sporting estates can be held accountable for the actions of their employees in relation to any incidents.



Waterfall in small burn  
Genevieve Leaper (rspb-images.com)

## Why licensing is our preferred option

Our uplands need to be places where nature can flourish with a rich diversity of wildlife and deliver vital services for nature, climate and people.

**If driven grouse shooting is to have any place in that future, licensing is the only option.**

We believe that the introduction of a licensing system is the best way to reduce the damaging impacts of grouse moor management and deliver for those in the shooting community who support change, but currently feel powerless. Whilst

there are many voices who advocate for a ban, citing environmental benefits, its imposition would have an immediate effect on the local rural economy and on some species that benefit from grouse moor management. Licensing is a pragmatic option which we believe can command support from all sides in this debate. Through licensing, responsible shooting could continue, more sustainable shoots would become the standard and environmental outcomes would improve for the benefit of wider society, nature and climate.

**The RSPB is calling for all political parties to commit to the introduction of licensing for driven grouse shooting.**



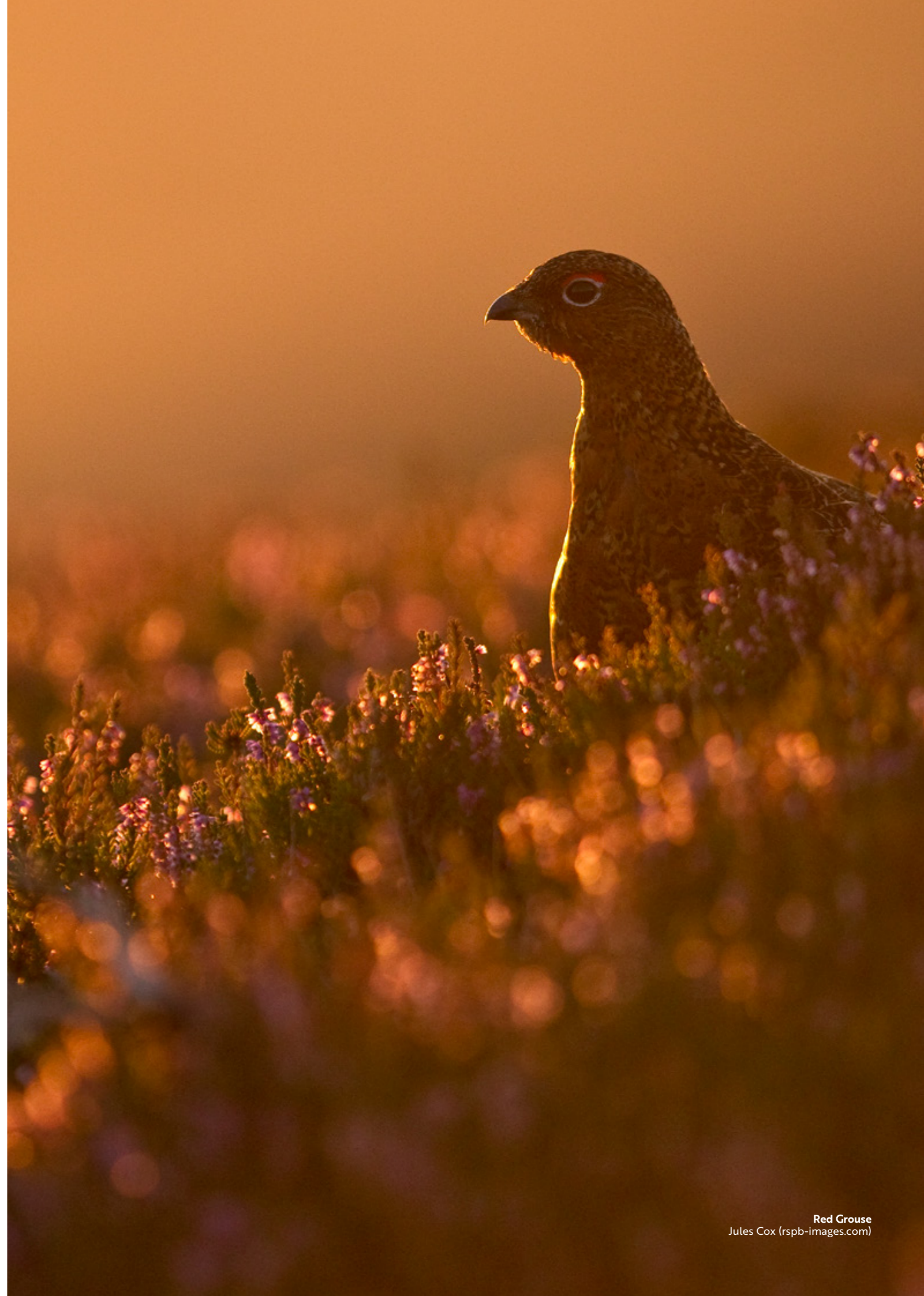
Red grouse, grit trays for worming  
Mike Lane (rspb-images.com)



Cartridges being ejected from a shotgun  
Graham Eaton (rspb-images.com)



Moorland wildfire destroying upland habitat  
Jon Bird (rspb-images.com)



Red Grouse  
Jules Cox (rspb-images.com)



Protecting habitats, saving species  
and helping to end the nature and  
climate emergency.

**Nature is in crisis.  
Together we can save it.**

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### Head Office

RSPB The Lodge  
Potton Road  
Sandy  
SG19 2DL

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